



**HELLO
FRESH**

2025 Child and Forced Labour Report



Executive Summary

At HelloFresh, our mission is to change the way people eat forever. As our customer base, geographic coverage and product offering expands, so too does our supply chain, increasing the scale and complexity of the individuals and organizations that play a vital role in delivering fresh ingredients to millions of households.

We remain steadfast that our mission must never come at the cost of the safety, security or fair compensation of anyone involved in our business or supply chain. In 2025, we continued to refine our approach to due diligence to prevent, mitigate, and remediate adverse impacts of child and forced labour in our supply chains.

We acknowledge that within a vast and diversifying supply network, the risk of child and forced labour is an inherent risk. We are committed to maintaining proactive, transparent relationships with all our suppliers to minimize these risks to the greatest extent possible. This report outlines the specific actions taken to strengthen our oversight and address child and forced labour risks within our business operations and supply chain for the 2025 financial year.



Introduction

GDE Grocery Delivery E-Services Canada Inc. (“HelloFresh Canada”) is a company incorporated in Canada with its registered office located in Toronto, Ontario. As a wholly-owned subsidiary of HelloFresh SE, HelloFresh Canada operates as part of a global group dedicated to sustainable and ethical business practices.

This report given pursuant to Section 11 (3) of the *Fighting Against Forced and Child Labour in Supply Chains Act* (the “Act”) and covers the activities of HelloFresh Canada for the year **January 1st 2025 to December 31st 2025**. Approved by the Directors of HelloFresh Canada, this statement affirms our support for the objectives of the Act and our ongoing commitment to prevent and address forced and child labour throughout our global supply chain.



Our Structure, Activities, Operations & Supply Chain

Operating in Canada since 2016, HelloFresh is the leading provider of home-delivered meal kits and pre-cooked meals to consumers nationwide.

In collaboration with our extensive network of suppliers, we source ingredients and packaging materials, and provide customers with pre-portioned ingredients and pre-cooked meals as part of a wide variety of carefully curated recipes for Canadians to enjoy.

As part of our commitment to providing the highest quality product offering for our customers, HelloFresh Canada has made significant investments in establishing the business processes and operational infrastructure to facilitate our growth and expansion. This includes a workforce of over 1000 employees across Canada, the operation of distribution centres in Edmonton, Abbotsford, Brampton and Mississauga, our head office in Toronto, our last mile delivery hubs, a fully integrated distribution and logistics chain, and a robust technology platform to facilitate our evolving operations.



Operations

Our meal-kit and ready-to-eat operations revolve around the fulfillment and delivery of meal box subscriptions for our customers, entailing a weekly cycle involving the procurement of various bulk, pre-portioned, pre-cooked, and pre-packaged meals and ingredients. Our operations also involve the procurement of packaging, insulation, and ice-pack materials to keep our food fresh throughout the delivery process.

The delivery and storage of inbound materials is coordinated at our distribution centres to facilitate the pick-and-pack and sorting process before our products are distributed to customers through a network of HelloFleet service or delivery providers. The fast moving nature of our product offering means that we rely on building and maintaining strong and mutually beneficial supplier relationships. This includes streamlined coordination with our suppliers across various stages of the supply chain. Not only does this ensure that our production and distribution process goes smoothly, but it also allows us to prioritize partnerships that closely uphold labour, quality, safety, and sustainability standards, both globally and nationally. Our business model diverges from the conventional operations of traditional grocery or food retailers and allows us to place heavy reliance on our supplier's ability to adapt flexibly to our operational requirements.

Supply Chain

We work with a vast array of suppliers to facilitate our operations, and these can be broadly categorized into Upstream, Downstream or Indirect Suppliers.

Upstream Suppliers

Upstream Suppliers are those who supply our ready-to-eat and meal-kit businesses with raw materials and pre-production goods for further input, packing, preparation, processing and delivery or those that provide finished goods. These include suppliers of, but not limited to, the following categories:

- Meats & Other Proteins
- Fruits & Vegetables
- Bakery Items
- Dairy items
- Pre-packaged meals (i.e. marketplace products)
- Spices, Sauces and Condiments
- Packaging Materials (i.e. boxes)
- Recipe Cards & Other in-box materials
- Inbound Freight Providers

Downstream Suppliers

Downstream Suppliers are those who provide inputs into our products from when they are received by HelloFresh Canada through to the end-delivery to our customers.

Downstream suppliers include, but are not limited to:

- Logistics and Outbound Freight Providers
- Third-Party Labour Providers
- Equipment & Maintenance Providers

Indirect Suppliers

Indirect Suppliers are those who do not directly contribute to the fulfillment of our orders, but are necessary to the operation of a certain function of the business, or provide ancillary support to the business. Indirect Suppliers include, but are not limited to:

- Cleaning & Pest Control Providers
- IT Providers
- Various Tech & Software Suppliers
- Insurance Providers
- Consultants, Advisers and Professional Consultants
- Property Development and Leasing Providers
- Suppliers of Marketing Services
- Utility Providers



Policies Relating to Forced Labour and Child Labour

We have implemented policies addressing child and forced labour in our own operations and supply chains. The following section describes these policies.

Ethical Trading Policy

Our Ethical Trading Policy applies to all suppliers and service providers of HelloFresh SE and its subsidiaries.

The policy is integrated into standard supplier contracts and our procurement processes, and is accessible for all external stakeholders on our Group website. By accepting the policy, our partners commit to respecting human rights and taking actions to address human rights concerns in their operations and value chains. Ethical standards and expectations set out in our Ethical Trading Policy include: prohibition of child labour, forced labour and all forms of slavery; rights of freedom of association and right to collective bargaining; payment of appropriate wages; occupational health and safety at work; and prohibition of unequal treatment.

Our Group Human Rights Officer monitors the implementation of the Ethical Trading Policy through several mechanisms, including assessing the number of direct suppliers that have signed the policy, reviewing and tracking incidents raised via our grievance mechanism or audits, as well as monitoring the completion of our ethical trading training.

Code of Ethics

Our Code of Ethics sets out our ethical standards as well as our expectations towards our employees to uphold our values and act sustainably - for our planet, our people, our community and our business. This code of conduct, which is binding for all employees, clarifies our expectations for respecting human and environmental rights and reinforces that we do not tolerate any form of child labour or forced labour.

Human Rights Statement

Our Human Rights Statement is the foundational policy providing the framework for our Groupwide due diligence program to prevent, mitigate, and remediate adverse impacts in our supply chains.

Due Diligence Processes

As part of the HelloFresh Group's ongoing compliance with the German Supply Chain Due Diligence Act, we have developed a comprehensive Ethical Trading strategy. This strategy is designed to promote respect for human and environmental rights, identify potential risks at an early stage, and mitigate those risks through appropriate and effective preventive measures. When violations are identified, we take timely and proportionate corrective actions.

Our supplier due diligence process follows a risk-based approach, enabling us to focus resources on the areas where the potential impact on people and the environment is greatest.



Measures to Assess & Measure Risks of Child and Forced Labour

Own Operations

Risk Assessment - Own Operations

In 2025, we conducted a risk assessment based on inherent country and sector risk data from Sedex (Supplier Ethical Data Exchange), a leading platform for responsible sourcing. This enabled us to identify potential human rights risks associated with our business activities.

Risk Prevention & Management - Own Operations

To effectively manage and prevent risks associated with child and forced labour, we have established measures within our workforce, covering both direct hires and agency workers. During onboarding, protocols are implemented for direct hires to

verify legal documentation and entitlement to work in Canada. This includes thorough checks on documents such as contracts of employment, driver's licenses, and work permits. Contracts are validated using digital signing platforms like DocuSign, and all necessary documentation is uploaded to our Workday Human Resources Information System.

In the case of agency workers, our partners are mandated to adhere to our Ethical Trading Policy, with clauses enforcing compliance with Canadian legislation embedded within their contracts. Specifically in Ontario, we have mandated that all third-party labour agencies have a license in accordance with provincial law.



Supply Chain

Risk Assessment - Tier 1 Suppliers

In 2025, we conducted our annual Groupwide risk assessment to identify high-risk procurement categories, i.e. commodities and services associated with an elevated risk of adverse human rights or environmental impacts. For this assessment, we use data and risk analysis from Sedex, one of the world's largest data platforms for ethical supply chain assessments. It provides country-, product- and industry-specific risk data and allows companies to exchange data with their suppliers and gain greater visibility into their ethical practices.

In addition, we include information gained through our grievance mechanism, audits, and internal expert input.

High-Risk Procurement Categories

Our assessment identified five categories with heightened ethical risk exposure, including:

- Produce, Herbs, and Fruit
- Meat
- Seafood
- Third-party labour
- Last mile

Risk Prevention & Management - Tier 1 Suppliers

Ethical Trading Policy Clause within our Master Services Agreement

We have fully integrated our Ethical Trading Policy into our Master Service Agreements, establishing a clear contractual mandate for our partners. Since 2023, we have required all new suppliers within our high-risk procurement categories to provide formal contractual assurances of compliance, ensuring our ethical standards are legally enforceable throughout our supply chain. In 2025, 82% of our Tier-1 suppliers in high-risk procurement categories supporting our Canadian business committed to the latest version of our Ethical Trading Policy.

Supplier Ethical Data Exchange (SEDEX)

To gain a deeper understanding of our suppliers' practices and risks, all of HelloFresh Canada's Tier-1 suppliers in high-risk procurement categories are mandated to complete a self-assessment questionnaire ("SAQ"). We use Sedex as the primary tool for assessing our suppliers'



individual ethical performance. The Sedex SAQ is designed to collect detailed site-specific information on policies and management systems, as well as workforce characteristics.

The output of these assessments is an ethical risk rating for each individual supplier within high-risk procurement categories, which allows us to identify individual suppliers with high ethical risk (“High-Risk Suppliers”). This risk rating serves as a basis for mandating additional due diligence such as audits and training. In 2025, 70% of our Tier-1 suppliers in high-risk procurement categories completed a SAQ.

Sedex Member Ethical Trade Audit (SMETA) Audit

HelloFresh Canada uses SMETA (Sedex Members Ethical Trade Audit) as our preferred audit standard. These audits are conducted by independent, Sedex-approved audit firms based on a robust human rights framework and include a detailed report on findings, if any, as well as a corrective action plan including timelines for rectification. All identified High-Risk Suppliers within prioritized ingredient categories, as well as high-risk labour providers and last-mile suppliers, have received a request for a third-party ethical audit. In 2025 83% completed the ethical audit.

Monitoring

HelloFresh Canada's current engagement efforts are primarily focused on direct suppliers, centering on the implementation of our Ethical Trading Policy and human rights due diligence. These efforts aim to ensure that workers across our value chain have their labour and human rights respected.

Through supplier self-assessments, third-party audits, and ongoing supplier engagement, we monitor supplier performance and strengthen transparency into labour conditions within our supply chain.

Enhanced Preventative Measures: Fish & Seafood Sourcing

In 2025, HelloFresh Canada strengthened its human rights due diligence through the implementation of a global Sustainable Fish and Seafood Sourcing Policy. This focus on fish and seafood was informed by internal risk assessments and Sedex commodity and country risk data, which identified the sector as higher risk for forced labour and labour exploitation. The policy expands oversight beyond direct suppliers to include deeper tiers of the seafood supply chain and integrates human rights risk assessments earlier in the sourcing process.



Higher-risk commodities are subject to enhanced screening during supplier selection, including risk profiling through supplier questionnaires and existing ethical due diligence tools. HelloFresh has also established a High-Risk Commodity Register to identify regions or commodities with elevated risks of forced labour or labour exploitation and to ensure appropriate due diligence measures are applied.

Where appropriate, HelloFresh conducts targeted supplier engagement and verification activities, including on-site assessments in higher-risk supply chains. These activities inform sourcing decisions, support supplier corrective actions, and strengthen ongoing risk mitigation.

Grievance Mechanism

Our grievance mechanism includes the SpeakUp! Platform through which concerns regarding potential human rights-related violations or risks can be raised by any individual within or outside the HelloFresh Group, explicitly including workers in our value chain. The SpeakUp! platform is accessible at all times via a mobile app and web browser in multiple languages, and allows for anonymous reporting if preferred and is also included in our Supplier Human Rights Training.

Measure to Remediate any forced / child labour risks in our operations

In the last financial year, we didn't identify any incidents of forced or child labour to remedy. We therefore did not need to take any measures to remediate an incident of forced or child labour.



Training Provided on Forced Labour and Child Labour

In 2025, we developed our own Supplier Human Rights Training to raise awareness and address key risk areas identified in our risk assessment for high-risk procurement categories. The training covers our human rights strategy, standards, and general expectations towards our business partners, our grievance mechanism, as well as in-depth modules and practical guidance on how to mitigate the most critical risks relevant for the respective supplier segment.

As part of the initial roll out, we included all High-Risk Suppliers within prioritized ingredient categories and providers of labour services. In 2025, 100% of our High-Risk Suppliers in scope of the training completed our Supplier Human Rights Training.

In addition, we continued to strengthen internal capacity through targeted employee training. In 2025, we rolled out an Ethical Trading E-Learning Module for key functions including procurement, sustainability, food safety and quality, legal, human resources, logistics, and senior management.



Assessing Effectiveness

2025 Performance

HelloFresh Canada assesses the effectiveness of its human rights due diligence program by tracking supplier engagement, verification coverage, and training outcomes across higher-risk areas of the supply chain. In 2025, 82% of suppliers in prioritized risk categories approved our Ethical Trading Policy, 70% completed a SAQ, and 83% of identified high-risk suppliers provided an ethical audit report. In addition, 100% of high-risk suppliers completed human rights training, and 93% of employees in risk-relevant departments completed Ethical Trading training. Together, these indicators help us evaluate progress from policy commitment to implementation, while ensuring that suppliers and internal teams have the knowledge and oversight mechanisms needed to identify, prevent, and address potential forced labour and child labour risks.

Metric	2025 Performance
% of suppliers that have approved our Ethical Trading Policy	82%
% of suppliers that have completed an ethical Self-Assessment Questionnaire (SAQ)	70%
% of high-risk suppliers with ethical audit report 2025	83%
% of high-risk suppliers trained on Human Rights 2025	100%
% of Canadian HelloFresh employees in risk-relevant departments that have completed Ethical Trading training	93%



Statement of Approval - Board of Directors

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of GDE Grocery Delivery E-Services Canada Inc.

In my capacity as a Director of GDE Grocery Delivery E-Services Canada Inc. and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

This Statement has been reviewed and approved by the principal governing body of GDE Grocery Delivery E-Services Canada Inc., CEO Ian Brooks in his capacity as a Director of GDE Grocery Delivery E-Services Canada Inc. GDE Grocery Delivery E-Services Canada Inc. is a wholly owned subsidiary of HelloFresh SE and this statement was prepared in consultation with, and was reviewed and approved by, HelloFresh SE.

Signed by:

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Ian Brooks

CEO - GDE Grocery Delivery E-Services Canada Inc.

Board of Directors

Date: 4/28/2026

I have authority to bind GDE Grocery Delivery E-Services Canada Inc.

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