



Modern Slavery Statement 2023

Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Grocery Delivery E-Services UK Limited ("HelloFresh UK") in the year ending 31 December 2022 to prevent Modern Slavery and human trafficking in its business and supply chain. References to "HelloFresh" are references to the HelloFresh Group companies unless otherwise stated.

HelloFresh UK (including Green Chef) considers Modern Slavery to be a serious global issue and we know that our customers and suppliers share our concerns. Our commitment is very clear: we will always treat people in our business and supply chain fairly. In addition, we aspire to be at the forefront of eradicating Modern Slavery within our industry and the wider environment. As set out in this statement, we have made significant progress in 2022 and in the year ahead, we will continue to develop and adapt our approach to managing the risk of Modern Slavery within our business and supply chain which remains a key focus of the business at a board level.

Progress over the last 12 months:

Our Operation:

- Achieved an AA Grade BRCGS audit at both operational distribution centres with modules covering ethical trading, responsible sourcing and agency management.
- Further established our UK and Group sustainability steering group which considers responsible sourcing and issues set out in our Modern Slavery Statement on a regular basis.
- Launched our [Speak Up platform](#) in our offices and distribution centres providing a secure way for our employees to anonymously report concerns regarding modern slavery, violations of our code of ethics, our ethical trading policy, health & safety policy, food quality or food safety concerns.

Our Supply Chain:

- Reviewed our direct supply base to ensure that 100% of our direct ingredient suppliers are SEDEX registered.
- As part of our successful application to become a BCorporation, our supply chain management was audited including investigations into our Supply Chain Risk Assessment and Mapping, Tracking and Traceability and Supply Chain Compliance. We received a total score of 83.8.
- Increased the use and functionality of our Quality Management System and extended mapping our suppliers to indirect suppliers.
- Developed relationships and transparency with our supplier partners, working together to manage ethical

risk through regular visits and audits in countries or industries of higher concern.

- Updated and rolled out a new version of our Ethical Trading Policy, which now forms part of our contractual Service Level Agreement with our suppliers.
- Passed an audit conducted by Red Tractor ensuring our supplier management and traceability system met the requirements of Red Tractor. We also audited our suppliers to ensure they also comply with Red Tractor and/or Global Gap requirements where specified.

Our business and supply chain

HelloFresh was founded in 2011 as one of the first innovators in the meal-kit industry. Shortly after the founders assembled the first meal kits in their kitchen, HelloFresh quickly expanded its operations to nowadays offer nationwide coverage in Germany, the Netherlands and the United Kingdom, and later expanded to Austria, Australia, the United States (excluding Alaska, Hawaii and the US territories and possessions), Belgium, Canada, Switzerland, Luxemburg, France, New Zealand, Sweden, Norway, Denmark, Italy, Spain, Ireland. Nowadays, HelloFresh also offers a wide range of ready-to-eat meals, snacks, and pantry items.

Our mission is to change the way people eat – forever. Our meal kits contain nearly everything required to create varied, nutritious meals at home, helping our customers save time on shopping and meal planning. The meal-kit market is our primary business vertical, which is covered by our HelloFresh, EveryPlate, Green Chef and Chefs Plate brands. We are also developing our direct-to-consumer ready-to-eat business vertical, represented by our Factor and Youfoodz brands, and are piloting other businesses, such as premium pet food brand The Pets Table.

Our business model allows us to manage a shorter supply chain compared to those used by grocery stores. To provide millions of meals to our customers, our innovative supply chain includes more than 1,500 suppliers, many of them domestic. The ingredients we source are then utilised in our distribution centers, where the meal-kits are packed. In the UK, we currently operate two distribution centers (“The Beehive” in Nuneaton and “The Granary” in Banbury). The wider HelloFresh Group operation also has complex supply chains, which includes goods that are not for resale including, packaging, IT equipment, logistic centres and offices. Furthermore, we have numerous service providers that keep our business operating day to day.

HelloFresh UK and Green Chef UK is a 100% subsidiary of our parent company HelloFresh SE.

Our Policy

As the world’s leading meal kit company, we are aware of our responsibility to protect human rights. We see this responsibility as an integral part of our business and corporate policy. HelloFresh is committed to comply with all relevant laws in the countries we operate and to maintain the highest standards of professionalism, integrity, ethics and respect for human rights. We have various policies in place to promote responsible business practices across our supply chain and to minimise risks from any potential human rights violations.

Ethical Trading Policy

In 2022, we have updated our [Ethical Trading Policy](#) to include further protected rights and state our expectations to our suppliers more explicitly. The HelloFresh Group Ethical Trading Policy sets out the

principles that we believe are essential to translate our values into action. This is further detailed in our Ethical Trading Standards. These are based on two internationally recognised standards, namely the Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on the Fundamental Principles and Rights at Work.

Our Ethical Trading Standards (i.e. the minimum standards we expect our suppliers to comply with) include:

- No forced or bonded labour
- No child labour and protection of young workers
- No discrimination and equal treatment
- Compliance with employment contracts, wages and working hours
- Freedom of association and the right to collective bargaining;
- Provision of a safe and hygienic workplace
- Respect of the resources of local communities

Our Ethical Trading Policy sets clear minimum requirements for doing business with any company of the HelloFresh Group and is applicable as a minimum standard to all suppliers of goods and services, including branded and own brand suppliers in all sourcing countries.

The policy also states that the HelloFresh Group expects its suppliers to assess their own ethical trade risks (including Modern Slavery), to maintain appropriate management systems for complying with this policy, monitor compliance and to remediate any violations in their own operations or supply chains. This includes that suppliers are aware of all their supply chain partners and pass down our requirements to their supply chain partners accordingly. Suppliers are also required to provide fair reporting mechanisms for their employees. We expect our ingredient suppliers to prove the country of origin for their used raw materials.

As part of our Ethical Trading Policy, we also expect our suppliers to immediately report any concerns regarding potential violations of our Ethical Trading Standards in our own operations, at our business partners or their supply chains to us.

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. We expect everyone, at every level of our organisation, to take an active part in upholding our standards and to act sustainably, every day!

Human Rights Statement

Our [Human Rights Statement](#) describes our strategy to meet our responsibility to protect human rights in our own operations and supply chains. Our human rights strategy includes measures to promote human and environmental rights, to identify risks to protected rights at an early stage, to minimize them and to take appropriate corrective action in the case of violations. Our strategy is informed by international frameworks and guidelines and covers the following topics:

- Our requirements for ourselves and our partners
- Risk analysis and risk management
- Our prevention programme
- Our Complaints Procedure
- How we deal with violations of human and environmental rights
- Monitoring & Continuous Development
- Documentation & Reporting

Due Diligence

HelloFresh UK's supply chain consists of a large network of suppliers who supply a wide range of goods, and in doing so employ varying degrees of labour resources across many geographical regions. For these reasons, a tiered approach to assessing the risk level of each of our Upstream Suppliers is necessary in order for us to conduct a reasonable assessment of our supply chain, and to prioritise our efforts to address any risks of Modern Slavery Practices.

In connection with the HelloFresh Group's preparation for compliance with the German Supply Chain Due Diligence Act (which took effect on 1 January 2023), and as part of the ongoing development of a comprehensive Ethical Trading Program across the group, a globally-standardised approach has been developed to categorise suppliers and assign a risk rating, with respect to the risk of various modern slavery and human rights practices, which allows for the prioritisation of more thorough assessments, monitoring and remedial or corrective action where necessary.

Risk Assessment and Management

Risk Assessment

In 2022, we have developed our group-wide Ethical Trading Strategy which also covers Modern Slavery. The strategy is based on five pillars: risk assessment, preventive action program, corrective actions, monitoring, and documentation & reporting. This year, we have also started with the implementation of the first workstreams under this new strategy.

This year we have also developed a methodology for our first group-wide ethical trade risk analysis process. It consists of an abstract risk analysis aimed at enabling us to identify the relevant human rights and environmental risks arising from our business activities (including our supply chain) as well as determining direct supplier groups with an elevated risk level. This abstract risk analysis will be followed by an in-depth risk analysis to identify high risk business areas and suppliers.

To identify risks that are relevant to us and understand which supplier groups have an elevated risk as part of our abstract risk analysis, we have used a tool developed by an external consultant company which applies country and industry-specific inherent risk scores from SEDEX to the supplier location and commodity group to segment our supplier base into risk categories and to identify relevant risk areas as well as sectors and business areas with increased risk for the further in-depth risk assessment. The SEDEX risk scores were used in order to ensure a robust methodology as they are based on a variety of recognised indices and data sources from international human rights organisations. Furthermore, risks were assigned an impact and severity level for prioritisation.

At the time of publishing, this abstract risk assessment has been performed. As a result, we have identified health protection and occupational safety, child labor, forced labor, discrimination, freedom of association, working hours, emissions and water usage as relevant topics in the context of our business activities. These topics are the focus of the further in-depth risk analysis. This will also include a Sedex assessment for prioritised suppliers within risk sectors and business areas based on self-assessment questionnaires or information gathered from responsible sourcing platforms. This process is also taking place during 2023, and will be addressed in further detail in future statements. On this basis we will prioritise identified human rights risks.

Risk Management

As part of our risk management programme, we have integrated the updated version of our Ethical Trading Policy into our contractual SLAs with our suppliers. From 2023 onwards, all new suppliers in identified risk sectors will have to provide contractual assurances to comply with our Ethical Trading Policy before doing business with us. Furthermore, in 2023, we will be asking all of our existing suppliers in these supplier groups to approve the updated Ethical Trading Policy.

As a further measure, all HelloFresh UK ingredient suppliers are required to be a member of SEDEX and complete the SEDEX Self-Assessment Questionnaire ("SAQ") to initiate our onboarding process which includes confirmation regarding suppliers' association with SEDEX. SEDEX is the world's largest collaborative platform where companies can share responsible sourcing data and progress with other members. The questionnaire asks suppliers to share information regarding their ethical practices by completing a set of questions in the topics of Labour, Health & Safety, Environment, and Business Ethics. Following on from 2021 we are pleased to report that, in 2022, **100% of our ingredient suppliers were SEDEX registered**. For HelloFresh UK, the questionnaire provides visibility over the suppliers' ethical practices and highlights areas that need action. Compliance with this requirement is being monitored. Suppliers must address any concerns raised by HelloFresh and be closed off within the timeframes stipulated prior to supply of goods to ensure legal compliance throughout the supply chain, to protect associated workers and customers.

Supply chain transparency

We are continuously striving to increase the transparency of our supply chain. In, 2022 we have increased the use and functionality of our Quality Management System in order to better map our direct and indirect supply chain. We have worked on further mapping our extended supply chain through our quality management system. This will enable us to have better visibility over our supply chain.

Auditing

In our Operation:

In terms of the workforce engaged in the fulfilment of HelloFresh products, this remains closely controlled by HelloFresh, with workers engaged in HelloFresh facilities being either directly employed, or engaged by trusted third-party labour providers. We have continued to develop strong controls with respect to our third-party workforce.

We conduct an internal audit programme for our own operations and use internal audits to continually reassess and respond to risks in our business and our service providers. Our focus areas in our business are agency workers in our distribution centre as well as any suppliers who deliver goods from outside the UK.

Checks are undertaken within our employee base to ensure that none of our employees or agency works are subject to Modern Slavery. Such checks include ensuring that all employees have their own legal documents, contracts of employment, own bank account and do not have other people speaking for them.

In our Supply Chain:

Based on the risk assessment, High Risk suppliers will be subject to Preventive Action and/or Corrective Action Programs, which will include:

- Supplier Audits and / or Visits
- Supplier Undertaking and Commitments
- Supplier executive declarations with respect to labour practices
- Supplier trainings
- Corrective and preventive action plans

The continued growth of HelloFresh, as well as their increased market presence and buying power, has led to the continued development of long term strategic relationships with reputable suppliers, increasing the level of transparency into the operations, practices and risks involved with major suppliers, and heightened HelloFresh's level of influence with respect to compliance with its own strict standards and policies concerning labour practices.

As described in the overview of our operations and supply chain, due to the level of integration and co-ordination required from many of our suppliers, HelloFresh UK enjoys strong and transparent relationships with its supplier network, and as part of assessing supplier suitability from operational, safety or quality perspectives, we generally gain strong insights into their facilities and operating models. In terms of upstream suppliers, this often involves regular visits to suppliers' premises.

Issues of non-compliance are escalated by FSQA and the procurement team who receive the completed SAQ, or by HR when relating to in-direct employment matters. Issues of non-compliance are resolved by the procurement team prior to any new supplier being onboarded. Issues of non-compliance, as well as the responses from our suppliers, are overseen by Directors in the business, as well as by the Senior Management Team and the Management Board.

Grievance channel

We are aware that despite great care in the implementation of our risk management programme, violations of human rights and environmental standards can occur at our suppliers, but also in our own business. In 2022, we have continued to encourage our supply chain partners to share and utilise our whistleblowing system that offers colleagues internal and external to the company the opportunity to report human rights violations and modern slavery issues. This could be in connection with our own business activities and the business activities of our business partners, especially our suppliers.

Concerns can be reported by post and by email (compliance@hellofresh.com). In addition, reports can be submitted via the [HelloFresh | Speak up! platform](#), an online tool that can be accessed via smartphone and PC and allows anonymous reporting if preferred. Further information HelloFresh's whistleblowing system as well as how we handle incoming reports can be found in our [Whistleblower Policy](#).

Reporting / KPIs

- 100% of our tier 1 ingredient suppliers are members of SEDEX
- 91% of our tier 1 ingredient suppliers have completed the SEDEX SAQ and are risk assessed based on their SAQ responses. The risk assessment is calculated based on site and sector specific risks (inherent risk score) and based on the specific responses (site characteristics). From this, we can conclude the risk level regarding ethical trade for our suppliers:
 - 25% are low-risk
 - 68% are medium-risk
 - 7% are higher-risk (predominantly due to their location - with risk mitigation measures in place to reduce this number). In addition:
 - 0% have a forced labour risk flag
 - 0% of our suppliers have a negative forced labour inherent risk score
- 100% of our high-risk suppliers have received an audit which we have visibility of on SEDEX

Plans for the next year

For 2023 and following years, we are planning the further implementation of our Ethical Trading Strategy which we have developed this year. As part of the implementation we are planning the following actions:

- **Ethical Trading Policy:** One of our key priorities for 2023 is to further roll out suppliers sign-off of our updated Ethical Trading Policy with a focus on those supplier groups that were identified to have an elevated risk. We are planning to disclose the share of these suppliers that signed off on the policy in the next reporting cycle.
- **SEDEX for own operations:** As part of the in-depth risk assessment of our own operations, identified business areas/sites with increased risk will complete the SEDEX risk assessment by filling in the Self-Assessment Questionnaire to identify any potential ethical risks.
- **Human Rights Statement:** At the time of publishing, we will have published our very first Human Rights Statement (see above). This statement describes our strategy to meet our responsibility to protect human rights and the environment in our own operations and supply chains.
- **Sustainable sourcing strategy:** We are working on the development of a sustainable sourcing strategy to mitigate prioritised human rights risks.
- **Supply chain transparency:** We aim to extend the mapping of our in-direct and secondary suppliers onto our Quality Management System.

- **Internal training:** At the time of publishing, we have rolled out BRCGS and other ethical trade in person trainings internally to our supplier food safety and quality staff, procurement, HR, compliance and distribution centre management functions. This will include specific pointers to how the regular audits and visits can be utilised to check for signs of workers right abuses, including modern slavery. Furthermore, we are aiming to increase the training offering for our internal stakeholders by creating ethical trade specific, educational video content. In addition, we have developed dedicated e-learning modules on our ethical trading standards and human rights strategy for our employees. Finally, internal trainings for key stakeholders regarding the SEDEX platform are ongoing.

HelloFresh Partnerships

HelloFresh recognises the crucial role of partnerships in tackling Modern Slavery. It is important that when we participate in partnerships, we are clear on the role they play and the value they add. In the past year, we have initiated or furthered our partnerships with the following organisations:



HelloFresh UK remains a member of the Stronger Together network to further understand how to tackle Modern Slavery in the UK operation and supply chain. Through www.stronger2gether.org, the initiative provides clear and pragmatic resources and training to support employers and labour providers in at risk sectors to deter, detect and deal appropriately with forced labour trafficking and other hidden labour exploitation.



HelloFresh continues to be a member of SEDEX who are a global not-for-profit membership organisation which works with its members to improve working conditions in global supply chains. SEDEX has more than 60,000 members in over 180 countries. SEDEX is one of the ethical trade organisations that we require our suppliers to be members of before we start trading with them.



We work with BAP accredited suppliers who provide verification that producers are following best practices to deliver farmed seafood safely and responsibly. This includes social accountability within the supply chain.



Roundtable on Sustainable Palm Oil is a not for profit which unites stakeholders from 7 sectors to develop and implement global standards for sustainable palm oil. This includes the development and implantation of a credible global standard for the entire supply chain of sustainable palm oil.



BRCGS is a leading brand and consumer protection organisation, used by over 29,000 certified suppliers in 130 countries, with certification issued through a global network of accredited certification bodies. The BRCGS includes Ethical Trade and Responsible Sourcing.



We work with suppliers who are Global G.A.P certified which is a certification developed to assess social practices on the farm, addressing specific aspects of workers' health, safety and welfare.



The Sustainable Seafood Coalition is a partnership of UK businesses. Since 2011, the SSC have been working to ensure a healthy future for our oceans. Our vision is that all fish and seafood sold in the UK comes from sustainable sources. A commitment to ethical sourcing is one of the requirements of their codes of conduct



We are and ensure we work with suppliers who are Red Tractor Certified who develop standards based on science, evidence, best practice and legislation that cover animal welfare, food safety, traceability and environmental protection.

This statement was approved by the board of Grocery Delivery E-Services UK Limited (T/A HelloFresh)

A handwritten signature in black ink, appearing to read "A. Park", is positioned above a horizontal line.

Adam Park

CEO HelloFresh