

Modern Slavery Statement 2020

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 2020 to prevent Modern Slavery and human trafficing in its business and supply chain. References to "HelloFresh" are references to the HelloFresh Group companies unless otherwise stated.

HelloFresh UK 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 2020 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:

- We have succeeded in our aim of ensuring that 100% of our direct suppliers are Sedex registered;
- We have mapped 100% of our direct suppliers onto our new Quality Management System and started extending mapping to indirect suppliers;
- We have launched an Ethical Trading Policy, which is being rolled out across the business in 2021;
- We have further established our UK Sustainabilty Steer Co which considered responsible sourcing and issues set out in our Modern Slavery Statement on a monthly basis;
- 100% of our produce suppliers are either Global GAP or Red Tractor assured;
- 100% of our suppliers (where applicable) source RSPO palm oil;
- We have expanded our partnerships and associations having joined the Sustainable Seafood Coalition in the last 12 months.

Our business and supply chain

Founded in Berlin in 2011, HelloFresh was one of the first companies to offer meal kit solutions as they are known today. Shortly after the founders assembled the first meal kits in their kitchen, HelloFresh quickly expanded its operations to 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 and most recently Sweden.

Our mission is to give every household the opportunity to enjoy fresh, delicious and healthy meals without the

associated hassle of having to find a recipe and shop for all the necessary ingredients.

The wider HelloFresh Group operation also has complex supply chains, which also 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.

Our 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. At the centre of our approach to human rights are a number of internationally recognised declarations, which form the foundation for how HelloFresh works. They include:

- UN Universal Declaration of Human Rights;
- UN Convention on the Rights of the Child;
- UN Convention on the Elimination of All Forms of Discrimination against Women;
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

The following policy is applicable as a minimum standard to all suppliers of goods and services, including branded and own brand suppliers in all sourcing countries. HelloFresh expects its suppliers to comply with and establish management systems for complying with this policy and to maintain records demonstrating compliance. The minimum standards we expect from our suppliers includes:

- Employment to be freely chosen;
- Child labour shall not be used;
- Employees to have freedom of association and the right to collective bargaining;
- Working conditions that are safe and hygienic;
- Payment of legal minimum wages;
- Freedom from discrimination in the workplace.

In addition, we require that all suppliers have their own codes of conduct, as well as policies and systems to manage ethical trade in their own supply chain and to report progress to us. We aim to lead by example and require all suppliers to allocate sufficient resource to ensure they comply with legal requirements as well as our policy on Modern Slavery.

Auditing

All HelloFresh suppliers are risk assessed and must complete a Self-Assessment Questionnaire ("SAQ") before we start trading with them which includes confirmation regarding suppliers' association with Sedex. We update the SAQ during re-tendering processes annually. 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.

Sedex is the world's largest collaborative platform where companies can share responsible sourcing data and progress with other members. We are pleased to report that in 2020 we were able to verify that 100% of our

produce suppliers were Sedex registered and it is essential that all new produce suppliers we start to work with in the forthcoming year are Sedex registered before we start trading with them.

Responsible sourcing and supply chain is a principle risk within our overall business wide risk assessment. We update risks, progress and track performance via a global risk management tool, which was implemented in 2020. This is audited on a monthly basis by our local compliance officer in conjunction with the individual risk owners, and assessed bi-annaully by our global risk management team with governance from our board of directors.

We use the information gathered as part of our internal audits to continually reassess and respond to risks in our business and supply chain. 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.

We assess the potential human rights risk of our supply chains by considering the country of origin where we are sourcing products. We also gather intelligence about emerging risks through our network of group companies. The vast majority of our products come from European suppliers which we consider as low risk.

Checks are also 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.

Awareness and plans for the next year

- Over the next 12 months we will continue to grow our partnerships and third party assocations to strengthen the governance of Modern Slavery through our supply chain and business;
- We aim to map our in-direct and secondary suppliers onto our Quality Management System; and
- We will be expanding the ethical trading and governance questions in our new supplier SAQ in order to obtain further insights and data points so we can work with our suppliers to end all forms of modern slavery.

HelloFresh Partnerships

HelloFresh recognise 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

This statement was approved by the board of Grocery

Delivery E-Services UK Limited (T/A HelloFresh)

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