



Modern Slavery Statement 2025

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 2024 to prevent Modern Slavery and human trafficking in its business and supply chain. The HelloFresh and Green Chef brands are both operated by HelloFresh UK, which is a 100% subsidiary of our parent company HelloFresh SE. References to "HelloFresh" are references to the HelloFresh Group companies unless otherwise stated.

HelloFresh UK (including Green Chef 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 continued to make significant progress in 2024. 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 in 2024

Within our operations:

- Achieved an AA+ Grade in our first unannounced BRCGS audits at our Beehive and Granary distribution centres with modules covering ethical trading, responsible sourcing and agency management. We are preparing our Windmill distribution centre to have its first BRCGS audit in 2025.
- Completed the SEDEX self-assessment questionnaire for our Windmill and Granary distribution centres enabling us to understand strengths and opportunities for improvement in our management systems.
- Conducted an in-depth risk assessment of our own distribution centres to identify relevant human rights risk topics
- Rolled out a mandatory ethical trade training to key departments such as food safety and quality, procurement, human resources, sustainability and legal.

Within our supply chain:

- Reviewed our direct supply base to ensure that 100% of our private label, direct ingredient suppliers are SEDEX registered.
- Requesting all suppliers with high ethical risk following their SEDEX Self-Assessment Questionnaire to provide an ethical audit report. This helps us understand the actual practices on the ground for those suppliers
- Requesting every supplier with high ethical risk following their SEDEX Self-Assessment Questionnaire to take our HelloFresh Human Rights Training to support them in improving their ethical practices.
- Developed relationships and built transparency with our supplier partners, working together to manage ethical risk through regular visits and audits in countries or industries of higher concern.

- Continued to require our Tier-1 ingredient suppliers to sign our Ethical Trading Policy.
- Actively review ethical audit non-conformity published on SEDEX and work closely with our supplier partners to discuss and develop appropriate corrective action.
- Acquired retailer status from Red Tractor following successful audits in previous years, ensuring our supplier management and traceability system met the requirements of Red Tractor.
- 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 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, Sweden, Norway, Denmark, Italy, Spain and 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 business verticals.

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 processed in our distribution centers, where the meal-kits are packed. In the UK, we currently operate two distribution centers (“**The Granary**” in Banbury and “**The Windmill**” in Derby) following the closure of ‘The Beehive’ in Nuneaton in early 2025. 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.

Our Policy

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, including those in the United Kingdom, and 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

The HelloFresh Group [Ethical Trading Policy](#) sets out the principles that we believe are essential to translate our values into action. In 2022, we updated our Ethical Trading Policy to enhance our Ethical Trading Standards (i.e. the minimum standards we expect our suppliers to comply with) and state our expectations to our suppliers more explicitly. Our Ethical Trading Standards 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 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

We continue to apply 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.

In order to address human rights and environmental risks arising from our business activities in an efficient manner, we have developed a Group-wide risk analysis process. This enables us to identify, assess and prioritise relevant human rights and environmental risks in our own operations as well as in our direct suppliers' operations. In a first step, we identify possible country- and industry-specific risks for our own operations and direct suppliers based on an abstract risk assessment. For business areas and supplier relationships with an increased abstract risk we then conduct an in-depth risk analysis to potentially identify and if necessary prioritise concrete risks. For this in-depth analysis we use data and risk analysis from Sedex and involve internal experts.

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. Since 2023, all new suppliers in identified risk sectors have had to provide contractual assurances to comply with our Ethical Trading Policy whilst retrospectively 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. Currently, **100% of our private label ingredient suppliers are 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. We have continued to increase 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 which has enabled us to have better visibility over our supply chain.

Auditing

In our Operation:

The workforce engaged in the fulfilment of HelloFresh products 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 our risk assessments, any high-risk suppliers will be subject to preventative action and/or corrective action programs, which will include:

- Supplier audits and 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 our increased market presence and buying power, has led to the continued development of long term strategic relationships with reputable suppliers. This has increased the level of visibility of their operations and practices 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 coordination 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.

Issues of non-compliance are escalated by FSQA and the procurement team who receive the completed SAQ, or by HR when relating to 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

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. 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 and 98% 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: 17% are low-risk, 57% are medium-risk and 7% are higher-risk (reduced from 18% last year).

Of our higher risk suppliers, 80% have had a SMETA audit and the final unaudited supplier will be audited shortly. 58% of ingredient suppliers have approved our new Ethical Trading Policy.

Plans for the next year

For 2025 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 2025 is to further roll out suppliers sign-off of our updated Ethical Trading Policy for supplier groups that have not previously been included.
- **SEDEX for own operations:** As part of the in-depth risk assessment of our own operations, certain business divisions/sites with increased risk will update their SEDEX risk assessment by filling in the self-assessment questionnaire to identify any potential ethical risks.
- **Supply chain transparency:** We aim to extend the mapping of our indirect and secondary suppliers onto our quality management system.
- **Supplier training:** We intend to offer specific human rights training for our suppliers that have a higher risk score following their Sedex self-assessment.

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 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 certification 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 has been approved by the board of Grocery Delivery E-Services UK Limited.

Philip Doran

Philip Doran
CEO HelloFresh UK
December 2025