



Modern Slavery Statement 2026

Introduction

This statement has been published under 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 2025 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 recognises that modern Slavery is a serious global issue and 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 2025. 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 2025

Within our operations, HelloFresh:

- Maintained an AA+ Grade in our BRCGS audit at our Granary site and achieved an AA Grade in our first BRCGS audit at our Windmill site with modules covering ethical trading, responsible sourcing and agency management.
- Conducted an in-depth risk assessment of our distribution centres to identify any human rights related risks.
- Continued with mandatory ethical trade training for key departments such as food safety and quality, procurement, human resources, sustainability and legal.

Within our supply chain, HelloFresh:

- 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.
- Implemented a global Sustainable Fish and Seafood Policy and established a High-Risk Commodity Register.
- Conducted its first full scope on-site Ethical Audit at a supplier site.
- Reviewed our direct supply base to ensure that 100% of our private label, direct ingredient suppliers are SEDEX registered.
- Requested 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
- Requested 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 reviewed ethical audit non-conformity published on SEDEX and worked closely with our supplier partners to discuss and develop appropriate corrective action.
- Maintained our 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, 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) with the latter being our main production site.. 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. 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 in 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

Fish & Seafood Sourcing Policy

In 2025, HelloFresh 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.

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.

As part of HelloFresh Group's 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.

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.

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.

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

In 2025, we have conducted our first full scope on-site Ethical Audit by HelloFresh staff. This includes pre-visit document screens and post-visit corrective actions, improvement plans and management follow-ups to ensure full implementation of all corrective actions. Where appropriate, we also conduct targeted supplier engagement and verification activities in higher-risk supply chains. These activities as well as the on-site visit inform sourcing decisions, support supplier corrective actions, and strengthen ongoing risk mitigation.

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 private label ingredient suppliers are members of SEDEX and 85% 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 and based on the specific responses.

From this, we can categorise the ethical trade risk level for our suppliers: 17% are low-risk, 76% are medium-risk and 7% are higher-risk. Of our higher risk suppliers, 100% have had a SMETA audit.

As of the date of this statement, 65% of ingredient suppliers have approved our Ethical Trading Policy.

Plans for the next year

For 2026 and following years, we are planning to continuously mature our Ethical Trading Strategy by incorporating new elements and expanding our program. As part of the implementation, we are planning the following actions:

- **Additional high-risk supplier groups:** One of key priorities is to keep our focus up-to-date on the relevant parts of our supply chain with the highest risk. Where we identify additional supplier groups with a high-risk profile we will work to incorporate them into our standard human rights due diligence program, including sign-off of our Ethical Trading Policy, SEDEX onboarding and further measures.
- **Self-assessment & Human Rights Training:** One of our key priorities for 2026 is to further roll out our self-assessment and Human Rights Training for supplier groups that have not previously been included.
- **Ethical Sourcing:** In 2026, we're planning to further expand our enhanced screening during supplier selection for further commodities.
- **Ethical Trading Policy & SEDEX:** We will continue to require suppliers from high risk procurement categories to sign our Ethical Trading Policy and to complete our SEDEX & self-assessment steps.
- **Supply chain transparency:** We aim to extend the mapping of our indirect and secondary suppliers onto our quality management system.

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.

We are and ensure we work with suppliers who are science, evidence, best practice and legislation that environmental protection.



Red Tractor Certified who develop standards based on cover animal welfare, food safety, traceability and

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

Philip Doran

Director

Grocery Delivery E-Services UK Limited

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