



## 1. Introduction

HelloFresh is committed to ensuring the welfare and rights of workers involved in the supply chain of products sold. HelloFresh considers the following three areas of focus for ethical trading: **suppliers, HelloFresh operations and service providers (such as agencies)**. Suppliers include those that HelloFresh works with directly and those who are indirect within the supply chain.

The policy defines how HelloFresh expects workers to be treated, respecting human rights as outlined within the following international standards International **Bill of Human Rights** and **International Labour Organization’s (ILO) Declaration on the Fundamental Principles and Rights at Work**.

*The policy clearly defines the labour practices that are deemed unacceptable by HelloFresh, both within the company itself and supply chains.*

### HelloFresh upholds 8 Ethical Trading standards encompassing prohibited practices and minimum employer provisions

#### PROHIBITED PRACTICES

- No forced or bonded labour
- No child labour
- No discrimination
- No harassment, harsh or inhumane treatment
- No excessive working hours

#### EMPLOYERS SHALL PROVIDE

- Respect for worker rights
- A safe and hygienic workplace
- Wages paid on time

## 2. Scope

The policy applies to **all HelloFresh geographies, business operations, suppliers** (direct and indirect), service providers and subcontractors. All HelloFresh, Chefs Plate, EveryPlate, Green Chef and private branded products are included. All workers are within scope, including but not limited to direct employees, agency or third party supplied, students, volunteers and migrants. Where the term ‘supplier’ is used within the policy requirements, this also includes service providers.

The policy covers:

#### A – Legal Compliance

- Strict adherence to all applicable regulations and legislation

#### B – Ethical Trading Standards

- No forced or bonded labour permitted
- Child labour must not be used
- Discrimination shall not be tolerated
- Workers must not be subjected to harassment, harsh or inhumane treatment
- No excessive working hours
- Worker rights
- A safe and hygienic workplace must be provided
- Wages must be paid on time

#### C – Infringement Actions

- Supplier communication and HelloFresh reporting expectations
- HelloFresh visits and audits
- Corrective action plans
- Termination of supplier or employee relationship

## 3. Requirements

All parties included within scope must comply with this policy in order to be associated with HelloFresh. All HelloFresh direct suppliers must read and acknowledge the requirements. Direct suppliers to HelloFresh are required to ensure any indirect HelloFresh suppliers used within their supply chains also strictly adhere to this policy.

*As a prerequisite requirement, **all HelloFresh employees must follow the HelloFresh Code of Conduct** which outlines core expectations of all workers whilst employed and representing the business.*

### A – Legal Compliance

All relevant national, regional and other applicable regulations or legislation must be strictly adhered to. Suppliers must keep up to date with any changing legislation or regulations applicable. HelloFresh may request evidence of compliance with applicable legislation or regulations at any time.

### B – Ethical Trading Standards

The standards outlined below are the minimum required to ensure ethical trading and respect of human rights. Any exceedance of the minimum standard is welcomed and encouraged by HelloFresh.

#### No forced or bonded labour permitted

- All forms of forced or bonded labour, including involuntary prison labour is prohibited. **No modern slavery or human trafficking is allowed in the supply chain.** Work must be entered into voluntarily.
- Every worker has freedom of movement and can leave employment without penalty at any time with or without cause and advance notice unless a written employment agreement exists that states otherwise.
- **Employers must not withhold original identity documentation at any time.**
  - The documents include but are not limited to passports, visas, identify cards, emigration documents and citizenship papers.
  - The documents shall only be held by the employer to enable fulfillment of relevant legal obligations and only with the permission of the worker.
  - If held under permission, documents shall be immediately available to workers on request.
  - All documentation must be immediately returned to the worker once the relevant legal obligations are complete.
- **No worker must pay for a job.**
- No worker shall be verbally or physically coerced to work.

#### Child labour must not be used

- Use of child labour as defined in ILO convention No. 138 is strictly prohibited.
- Young workers must not be employed at night or in dangerous environments. **Young workers are defined as under the age of 18 but above the minimum working age outlined in ILO convention No. 138.**
- Young workers must not be permitted to work during compulsory education hours.

#### Discrimination shall not be tolerated

The HelloFresh Code of Conduct clearly prohibits all forms of discrimination in the workplace. All parties included within the scope of this policy must prohibit discrimination as outlined below:

- Applicants and workers in the following processes are included: hiring, remuneration, training, promotion, termination, retirement and/or other employment practices.
- All decisions in the above processes must be made on the basis of ability to perform a job rather than on the basis of: **race, national origin, colour, caste, social origin or position, gender, gender expression, sexual orientation, religion, age, disability, political opinion, marital status** or any other characteristic protected by applicable law.

## Workers must not be subjected to harassment, harsh or inhumane treatment

HelloFresh does not tolerate harassment inside or outside of the workplace, this is clearly defined within the HelloFresh Code of Conduct. **Harassment includes bullying, intimidation, direct insults, malicious gossip and victimization. The use or threat of physical, sexual or verbal abuse is strictly prohibited.** All parties included within the scope of this policy must also prohibit harassment.

## No excessive working hours

- The number of hours worked must comply with local and national laws.
- Employees must be given the appropriate rest breaks as defined in local and national laws

## Worker rights

- **Workers have the right to join a trade union of their own personal choice.**
- There shall be no discrimination against any worker for using their right to associate with a trade union of their choice.

## A safe and hygienic workplace must be provided

- Workers must be provided with regular health and safety training, as required by applicable law.
- Employers must take suitable **measures to prevent injury and accidents** arising in the workplace by identifying and minimising causes of hazards.
- A senior manager shall be appointed as accountable for health and safety.
- There must be access to basic facilities to support worker health and safety, such as sanitary toilets and potable water. **Access to water is a fundamental human right** that must be respected.
- Any accommodation or transportation provided by the employer must meet minimum legal requirements for safety, hygiene and habitability.
- If health and safety risks are increased due to unusual circumstances (e.g. pandemics), employers must **comply with appropriate health standards, recommendations and regulations** to ensure safe labor conditions for workers.
- Free emergency egress must be maintained at all times without blockage of any kind for any reason except when this is temporary for safety reasons.

## Wages must be paid on time

- Wages must at least meet the minimum legal requirements where the work is conducted.
- The worker shall have clear, written confirmation of their wages and frequency of pay to the extent required by applicable law.
- Employers are responsible for paying workers on time and in full as required by applicable law.
- Wages must be paid in legal tender or a comparable negotiable instrument directly to the worker.
- Deductions to wages must not be used as a disciplinary measure.
- There must be no deduction from wages without clear permission in writing from the worker, except in circumstances where there is applicable law allowing deduction without prior consent.
- Employers must ensure all workers are legally authorised for work in the relevant country

## C – Infringement Actions

### Supplier communication and HelloFresh reporting expectations

HelloFresh must be immediately notified by direct suppliers of any infringement or suspected infringement to this policy either within their supply chain or own business. HelloFresh must also be immediately notified of any third party allegations or enforcement action involving practices that would make the supplier in breach of this policy.

There is an internal reporting process to enable HelloFresh employees to report concerns about breaches to this policy.

## HelloFresh visits and audits

Unless otherwise agreed in writing, HelloFresh reserves the right to conduct unannounced visits or audits of direct suppliers and facilities where a brand name owned by HelloFresh is used. Unannounced visits or audits can be conducted if there is reason to suspect a serious infringement to this policy, with the supplier required to provide full access. Full cooperation is expected, which includes responses to reasonable requests. HelloFresh may also conduct announced visits or audits to verify compliance to this policy. Announced visits or audits will be conducted at a date and time agreed in advance and could include any parties within the scope of this policy. The HelloFresh Food Safety & Quality Assurance team are accountable for audits or visits conducted. All audits or visits can include any areas relevant to verify compliance to the HelloFresh ethical trading standards across production facilities, farms, worker accommodation, offices, distribution centres and storage sites.

Independent third party audits may be required. Scope of these audits must cover the standards as outlined within the policy. The supplier and HelloFresh must agree to the third party audit standard, scope and methodology selected. In the event HelloFresh finds a third party audit necessary, suppliers may demonstrate compliance by providing HelloFresh access to an existing third party audit report. HelloFresh will determine if the audit can be accepted based on the audit standard used, scope, methodology, date audit was conducted and any non-conformance identified. The supplier must complete corrective actions to the agreed timescale for all non-conformance identified in both third party audits and those conducted by HelloFresh.

## Corrective action plans

HelloFresh will work with suppliers within policy scope to agree a corrective action plan where full compliance to the Ethical Trading Standards are not achievable initially. Corrective action plans must detail clear timescales, responsibilities and specific actions to achieve compliance. The HelloFresh supplier is fully accountable for delivering the agreed corrective action plan within the timescale specified. Failure to agree or deliver a corrective action plan to an acceptable standard will result in no further business being awarded until HelloFresh is satisfied there is full commitment to the corrective action plan process.

## Termination of supplier or employee relationship

HelloFresh is committed to the compliance of termination practices, both from a business contract and employment relationship perspective. HelloFresh requires all suppliers to conduct legally compliant termination actions with employees. Any supplier suspected or found to be in breach of the policy will be investigated by HelloFresh. Breach of the policy may result in removal of contract should the breach be deemed severe enough, all other minor non-conformities must follow the corrective action plan process.