



Modern Slavery Statement

Jan – Dec 2024



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Statement from our CEO

We pride ourselves on being a trusted and ethically responsible business. Everything we do at Vitacress is underpinned by our values which includes 'Do the right thing'. From the way we grow our products to the way we take care of our people and those we work with.

With an estimated 50 million people trapped in forced labour and human trafficking globally, we are fully committed to tackling modern slavery and hidden labour exploitation in our own operations and end-to-end supply chain.

We ensure compliance to the Modern Slavery Act 2015 to make sure our business and supply chains are slavery free and uphold the principles of human rights and ethical business practices.

We do not tolerate any form of human rights abuse within our Group of companies or supply chains and will continue to follow our rigorous risk management processes. Achieving Stronger Together Business Partner status further proves our dedication to implementing good practice in this important area.

This Modern Slavery Statement summarises the steps we have taken to prevent modern slavery, exploitation and human trafficking during our financial year ending December 2024 and outlines our commitments for the financial year ahead.









Chris Jinks
CEO, Vitacress



Progress in 2024

We continually monitor and review the effectiveness of our processes and actions through key performance indicators related to modern slavery, labour exploitation and supply chain due diligence. We are proud to say that we have made good progress in strengthening our approach in 2024. For full transparency, we have included an update on progress for each commitment.

Focus 2024	Outcome by end 2024	
Commitment		
Work together towards Stronger Together Business Partner Status	We used industry and customer best practice guidance to create our Human Rights and Ethical Trade masterplan, driving improvement in our overall Stronger Together score from 63% to 67% and securing our advanced business partner status in 2025. We added ‘Promote Human Rights’ as a strategic priority within our environmental programme - Second Nature - elevating visibility of our commitment to human rights internally and externally.	
Work towards Responsible Recruitment Business Partner status	We used the Responsible Recruitment on-line self-assessment tool to evaluate our current practice. We updated our recruitment policy, established a programme of work to strengthen our approach and used our involvement in external networks to deepen our knowledge. Amber status recognises the extensive scope of this commitment that we continue to progress alongside a busy operational agenda.	
Leverage membership of the Food Network for Ethnical Trade (FNET) including active participation in relevant working groups	We are active members of FNET, embracing collective insight and best practice to improve. Our Group Head of Talent Acquisition (TA) represented Vitacress in the FNET Responsible Recruitment working group. A cross-section of colleagues attended Seasonal Worker Scheme Task Force events to map and identify risks. As an outcome of our active involvement, development of our Employer Pays Principle (EPP) policy and feasibility analysis is well-underway and recognised in a recent SMETA audit.	
Embed human rights training into our annual learning and development cycle	Introduction of a new e-learning platform and provider enabled more effective policy deployment and core capability building. We developed and delivered an in-house Modern Slavery workshop to upskill critical roles. We continue to use Stronger Together resources to deepen our collective knowledge and equip us to accelerate positive change.	
Assessing		
Use SEDEX risk assessment scores to support suppliers in reduction of their risks	We continued our engagement with SEDEX across HR, Technical and Procurement teams to fully utilise the tools and new developments within the risk assessment platform. We worked proactively with suppliers to improve their risk ratings and adoption of the SEDEX self-assessment (SAQ) to drive continuous improvement.	
Conduct in-depth labour agency audits, focusing on areas of risk such as accommodation	We continue to support and challenge our labour providers on visibility of their end-to-end supply chain and demonstrating adherence to our standards. With ever-increasing expectations such as the introduction of EPP, the amber status recognises the extensive and ongoing programme of work to mitigate risk in this area.	

Looking forward in 2025

Over the next year, we will build on the progress we have made and continue to uphold our commitment to addressing modern slavery and labour exploitation within a wider human rights framework. Focus areas and targets for 2025 are summarised below.

Focus Area	Target
Commitment	
Work towards Responsible Recruitment Business Partner status	Build on the foundation work completed in 2024 to achieve Responsible Recruitment Business partner status in early 2025.
Strengthen our Human Rights Management System	Enhance our existing human rights management system with introduction of new group policies to make even more explicit expectations of our own operations and end-to-end supply chain. Map these expectations directly into our human rights training programme, to ensure policy statement translates directly into continuous improvement.
Acting	
Deepen Workforce Engagement in our Human Rights Ambition	Enhance workforce communication channels with the introduction of a 3 rd party confidential reporting line (Safecall). Use this moment to remind colleagues of the many different options they can access to report concerns and access support.
	Relaunch Vitacress employee forum as 'VitaVoice' to include educational 'deep dives' into topics such as modern slavery. Deepen employee commitment and confidence in this forum through a highly responsive 'you said, we did' approach.
	Relaunch company-wide employee survey to assess employment experience. Use regular pulse-checks to track and report progress.
Remedy	
Standardise Human Rights Roles and Responsibilities in our Business Units (BU)	Through central direction and co-ordination, establish standardised human rights roles, responsibilities and team structures in each Vitacress BU. Ensure a highly consistent and efficient approach that leverages best practice and knowledge sharing across the group, with specific focus on response and remediation.
Monitoring	
Use centrally-held Human Rights and Ethical Trade masterplan to drive continuous improvement in each BU	Extend application of central plan as a tool for each BU to review and guide continuous improvement in own operations and end-to-end supply chain. Use application of a common standard to drive sharing and adoption of best practice and accelerate progress. Refresh human rights key performance indicators (KPIs) to automate data feed wherever possible and strengthen insight to accelerate action.
Communicating	
Equip and Empower Leaders to advocate for Human Rights and Ethical Trade	Through deployment of Vitacress new employer brand (The Vitacress Collective) equip and empower leaders to advocate for human rights and ethical trade, as a tangible demonstration of our commitment to investing in our people and culture as a strategic priority.

1. Organisation structure and business supply chain

Vitacress is a European-wide business that has a variety of farming and packing operations. In the UK, Vitacress has two packing locations, and a network of three leaf and seven watercress farms. Outside the UK, Vitacress has packing operations in Portugal and the Netherlands, two farming areas in Portugal and one farm in Spain.

Business Supply Chains

Vitacress is committed to the highest standards of ethical conduct and environmental responsibility. Vitacress requires key suppliers to operate in accordance with the principles of its Supplier Code of Conduct (SCC) and in full compliance with all applicable laws, regulations and codes within their countries of operation. Our SCC highlights the minimum requirements expected of a supplier to Vitacress and as such may be augmented by the law and by higher standards of expectations as set out in any contract between a supplier and Vitacress.

Vitacress' Purchasing Policies also provide clear guidelines, committing every individual involved in purchasing and supply management processes to use their best endeavours to ensure that our purchasing and contracting activities are aligned with our Modern Slavery and Human Trafficking Statement.

Our purchasing policies have been reviewed during 2024 and remain relevant and appropriate to our operations.

International Supplier Network

Vitacress sources both raw material and non-raw materials from suppliers around the world directly and indirectly.

Suppliers we have a trading relationship with (first tier—direct source) are located in the following countries:

Belgium, China, Cyprus, Czech Republic, Denmark, Estonia, Ethiopia, France, Germany, Greece, Hungary, India, Ireland, Israel, Italy, Jordan, Kenya, Lithuania, Monaco, Morocco, Netherlands, Norway, Peru, Poland, Portugal, Senegal, Slovakia, South Africa, Spain, Sweden, United Arab Emirates, and United Kingdom and United States of America.

In addition, our suppliers also source (second tier) from the following countries:

Argentina, Bulgaria, Chile, Egypt, Finland, Israel, Japan, Malaysia, Moldova, Pakistan, Romania, Taiwan, Tunisia, Turkey, Slovenia and Sri Lanka.

2. Policy framework

Our policies and codes of practice support Vitacress’ opposition to all forms of human rights abuse and take account of local, national and international laws and regulation. We continue to invest in our Human Resources Information Systems (HRIS) and company intranet (Greenhouse) to ensure company policies and procedures are accessible to all employees, as well as being fully integrated into our company onboarding process.

UK

All policies and codes of practice were reviewed by our legal advisors during 2024 and changes made where relevant to maintain compliance and best practice. Relevant policies and codes of practice are summarised below:

Policies and Procedures	Codes of Practice
<ul style="list-style-type: none">• Modern Slavery• Preventing Hidden Labour Exploitation• Agency Labour Provider• Human Rights - Equal Opportunities and Dignity at Work• Young Person and Child Worker• Grievance• Whistleblowing• Recruitment• Anti-Bribery• Group Purchasing Policy	<ul style="list-style-type: none">• Employee Code of Conduct• Supplier Code of Conduct

Vitacress Portugal and Vitacress Real (The Netherlands)

As part of induction, each employee receives the following policies: Employee Code of Conduct, Whistleblowing, Recruitment, Grievance, Anti-Bribery, and Equal Opportunities. In addition, Vitacress Real manages labour provision through the ABU (General Federation Temporary Employment Agencies), which ensures affiliates comply with the law and are subject to annual audits. As required by Dutch law, whistleblowing and grievance procedures are supported by independent counsellors. Vitacress Real has appointed two counsellors as described in the colleague handbook.

Vitacress Espana (Spain)

Our policies and codes of practice in Spain have been translated from the UK versions and adjusted to take account of local law. We work with local independent labour law experts to ensure compliance.



3. Due diligence processes

Vitacress SMETA Audit Status (Manufacturing)

All Vitacress sites are registered on the Supplier Ethical Data Exchange platform (SEDEX), and our manufacturing sites have SMETA audits.

Supplier Due Diligence

The main tool used for ethical risk assessment of all UK operations and supplier network is SEDEX. All raw material and ingredients suppliers, and temporary labour providers are registered on the SEDEX platform together with all UK based packaging suppliers. As such, there is a requirement to complete a self-assessment questionnaire (SAQ) and initiate a trading relationship on the platform with the relevant Vitacress business.

The business units hold a monthly review of registered suppliers using the SEDEX risk assessment tool (RADAR) which highlights the risk category for each registered supplier. Where appropriate, a SMETA audit is required for raw material suppliers classed as high risk. Further spot checks and due diligence is carried out monthly to assess suppliers classed as high or medium risk, and support given to mitigate this risk through corrective action.

Where suppliers have SMETA audits that require non-conformances closing out, further support and help is provided by relevant Vitacress team members when necessary.

Our operations in Europe use several tools to aid ethical assessment, subject to customer requirements, local laws and Vitacress practices. These include SEDEX, GLOBALG.A.P Risk Assessment on Social Practice (GRASP) and the Vitacress Supplier Code of Conduct.

Annual assessments for raw material, ingredient or packaging suppliers have continued. The technical warranty packs have been reviewed and updated for raw material and ingredient suppliers and, together with the Supplier Code of Conduct and SEDEX registration, are issued and agreed annually.

Vitacress utilised the UK Government Seasonal Agricultural Workers Scheme for our farms in 2024, sourcing workers via approved providers.

Audits

All stages of Vitacress operations, supply chain and labour provision can be subject to programmed or unannounced audit to ensure compliance to Vitacress' expected standards. Audits continued during 2024.

Vitacress Real labour provider has been audited as required by local law.

4. Assessing and managing risk

Vitacress continues to operate within the framework of our policies and codes of practice, enabling the business to carry out risk assessment and due diligence as necessary.

Risk assessment within UK operations is supported by AB (supplier/buyer) membership of SEDEX and, where necessary, SMETA auditing.

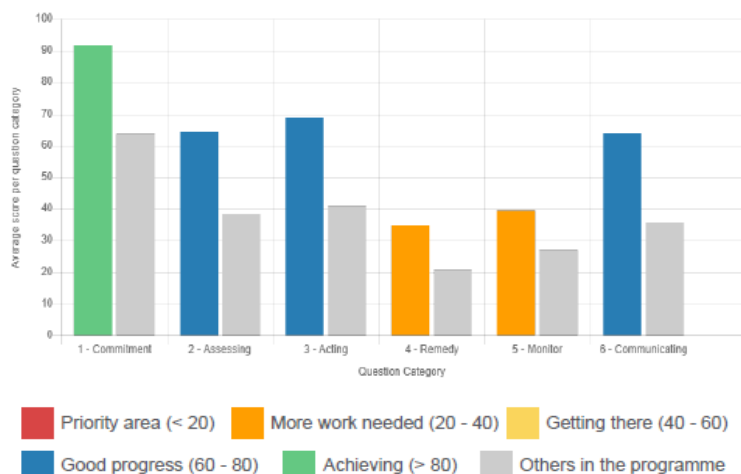
Raw material sourcing can include products from countries classed as high risk in terms of potential human rights abuses. To support risk assessment and due diligence, all programmed raw material suppliers are registered on SEDEX.

Where higher risk factors are indicated, a SMETA audit is required, and any non-conformances identified must be closed out in the appropriate timescales. Results of SMETA audits are reviewed by the relevant site team and any further action deemed necessary is taken. This may involve site visits, support with documentation and policies or verification via a follow-up audit.

The raw material supply base risk management within European operations is supported by the Supplier Code of Conduct. Further assessment is accessed via SEDEX or GRASP audits, with the latter requiring an annual audit. Raw material supplier visits are scheduled as necessary.

Use of other best practice networks and forums such as Stronger Together, Food Network for Ethical Trade (FNET), Modern Slavery Intelligence Network (MSIN), Seasonal Worker Scheme Taskforce (SWSTF) and customer communications support continuous improvement in Vitacress human rights due diligence and proactive horizon scanning to anticipate future risks.

5. Measuring effectiveness



The Stronger Together Progress Reporting Tool continues to be the primary mechanism by which we measure effectiveness of the steps we are taking to mitigate the risk of modern slavery in our end-to-end supply chain.

Measured against a set of UN Guiding Principles framed questions, we reported a 6% improvement in our overall score for 2024. Remedy and monitoring were identified as focus areas and are prioritised in our 2025 action plan.

6. Raising awareness and education

Education and Support

Vitacress has a robust onboarding, induction and training programme to ensure every colleague is made aware of the risks of Modern Slavery from the moment they start working with the company. Courses focused on Modern Slavery are run in person and via webinars.

Vitacress UK also makes available an employee assistance programme – WeCare (through Canada Life), whereby anyone can email or phone the free 24-hour confidential help line for wellbeing support and advice. The phone numbers are displayed on all company notice boards and the company intranet. Vitacress Portugal offers similar support through internal programmes and association with external organisations such as CLAIM support centre in Odemira (Centro Local de Apoio à Integração de Migrantes); a support centre for the integration and support of migrants.

Meetings

Vitacress Senior Leadership Team (VSLT) meet monthly and discuss Modern Slavery KPIs as part of the Company governance agenda.

The VSLT's review across all business areas is informed by local Business Unit (BU) Senior Leadership Team (SLT) review of Modern Slavery measures which takes place on a monthly basis.

Modern Slavery is an agenda item on employee engagement forums which have cross business worker representation.

Communication

Stronger Together, ETI Base Code and whistleblowing information is displayed on notice boards across the sites.

External communications are received weekly from the Food Network for Ethical Trade (FNET), giving details of hot spots or activities within the week relating to Modern Slavery.

Our collective commitment

We will continue to keep the threat of modern slavery and hidden labour exploitation at the forefront of our decision making, and ensure that policies, processes and engagement focus on improving our efforts in tackling risk in our business and supply chains.

This statement was approved and signed by the Vitacress Board of Directors on 8th May 2025 for the financial year ending 31 December 2024.



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