

Modern Slavery Statement

Jan – Dec 2025

Contents

Statement from our CEO

Progress in 2025

Looking forward in 2026

1. Organisation structure and business supply chains
2. Policy framework
3. Due diligence processes
4. Assessing and managing risk
5. Measuring effectiveness
6. Raising awareness and education

Our collective commitment

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 include 'Do the Right Thing'. From the way we grow and source our products to the way we take care of our people and those we work with, we are committed to operating with integrity and respect for human rights.

More than 50 million people worldwide are estimated to be trapped in forced labour and human trafficking, based on the latest global estimates. That's why we are fully committed to tackling modern slavery and hidden labour exploitation in our own operations and throughout our end-to-end supply chain.

In line with the Modern Slavery Act 2015 and international best practice, our approach includes assessing risks and identifying potential International Labour Organization (ILO) indicators of forced labour. These indicators inform our due diligence, risk management and remediation activities.

We ensure compliance with the Modern Slavery Act 2015 to help safeguard that our business and supply chains are free from slavery 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 continue to apply rigorous risk management processes. Achieving **Stronger Together Advanced Business Partner** status further demonstrates our dedication to embedding 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 2025 and outlines our commitments for the financial year ahead.











Chris Jinks
CEO, Vitacress



Progress in 2025

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 2025. For full transparency, we have included an update on progress for each commitment.

Goal	Outcome by end 2025	
Commitment		
Work towards Stronger Together Responsible Recruitment Business Partner status	We continued to build on the foundation work completed in 2024 towards Stronger Together Responsible Recruitment Business partner status in early 2026. Amber status recognises the extensive scope of this commitment that we continue to progress alongside a busy operational agenda.	
Strengthen our Human Rights Management System	Our existing human rights management system was strengthened through the introduction of new and updated group policies including Business Ethics & CSR; No Child Labour; and Response & Remediation. We simplified our approach to worker accommodation audits by adopting the Responsible Recruitment Toolkit (RRT) checklist as our best practice approach to meeting all customer needs.	
Acting		
Deepen Workforce Engagement in our Human Rights Ambition	Workforce communication channels were enhanced through the introduction of a 3 rd party confidential reporting line (Safecall). Launch of this channel was used to heighten visibility of the different ways colleagues can report concerns and access support.	
	Vitacress' local employee forum was relaunched as 'VitaVoice' and included educational 'deep dives' into topics such as modern slavery. Employee commitment and confidence in this forum was enhanced through our 'you said, we did' approach.	
	Company-wide employee survey functionality was developed but has not yet been launched. Regular 3 rd party audits and other employee sentiment gathering exercises such as performance reviews, indicated positive and improving employee engagement.	
Remedy		
Standardise Human Rights Roles and Responsibilities in our Business Units	Through central direction and co-ordination, standardised human rights roles, responsibilities and team structures were established in each Vitacress business unit, as a platform for best practice and knowledge sharing across the group.	
Monitoring		
Use centrally-held Human Rights and Ethical Trade masterplan to drive continuous improvement in each BU	The central plan was used as a tool for each BU to review and guide continuous improvement in own operations and end-to-end supply chain and provides a common standard for driving sharing and adoption of best practice. Human rights key performance indicators (KPIs) are yet to be updated and data feeds continue to be largely manual.	
Communicating		
Equip and Empower Leaders to advocate for Human Rights and Ethical Trade	Delivery of an upweighted modern slavery training plan to all key roles, enhanced communications, and deployment of Vitacress' new employer brand (The Vitacress Collective) served to 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.	

Looking forward in 2026

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 2026 are summarised below.

Goal	Target by end 2026
Commitment	
Strengthen organisational readiness to identify and respond effectively to modern slavery risks.	Building on the comprehensive, role-specific modern slavery training programme rolled out in 2025, we will use scenario-based, experiential learning to assess how well this knowledge has embedded within each business unit - ensuring we are fully prepared to respond effectively should any incident occur.
Assessing	
Risk mapping and assessment of 3 rd party raw material supply network.	Establish a one-UK ethical governance forum to drive effectiveness and efficiency in mapping and assessing human rights and labour exploitation risks across our 3 rd party raw material supply chain; increasing capacity for proactive action and partnerships. A key outcome will be the development of a standardised approach to supplier visits in which ethical is deeply integrated.
Acting	
Strengthen employee voice and data-led continuous improvement.	Use standardised employee pulse surveys to assess employee sentiment, raise awareness and drive data and insight-led continuous improvement across the company.
Assure robust, responsible recruitment practices.	Use the Stronger Together 360-degree online tool to continue progress towards the Responsible Recruitment standard which is now integrated into the Stronger Together Advanced Business Partner standard.
Drive a step-change in UK agency labour supplier capability and standards.	Run a formal supplier tender process for UK agency labour that is explicitly designed to elevate supplier capability and standards. This process will articulate clear requirements for scalable labour supply and require robust, transparent evidence of strengthened human rights due diligence and ethical labour practices.
Remedy	
Embed clear expectations for nurturing, response and remediation.	Embed frameworks that establish expectations of all Vitacress leaders and managers in nurturing people, ensuring they are equipped to respond and remediate appropriately.
Communicating	
Use participation in industry networks to drive continuous improvement.	Embed active participation in industry working groups with retail partners and FNET to support the adoption of best practice across the business, enable horizon scanning for emerging human rights risks, and contribute to continuous improvement in human rights policy and due diligence across the wider industry.

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 two 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 2025 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.

Group

Our existing human rights management system has been strengthened through the introduction of new and updated group policies including Business Ethics & CSR; No Child Labour; and Response & Remediation.

UK

All policies and codes of practice were reviewed by our legal advisors during 2025 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• No Child Labour• 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: Code of Business Principles, Social Responsibility Policy, and Code of Ethics and Conduct. 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 two counsellors appointed, 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 UK farms in 2025, 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 2025.

Vitacress Real labour provider was 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, identifying human rights risks and potential International Labour Organization (ILO) indicators of forced labour.

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

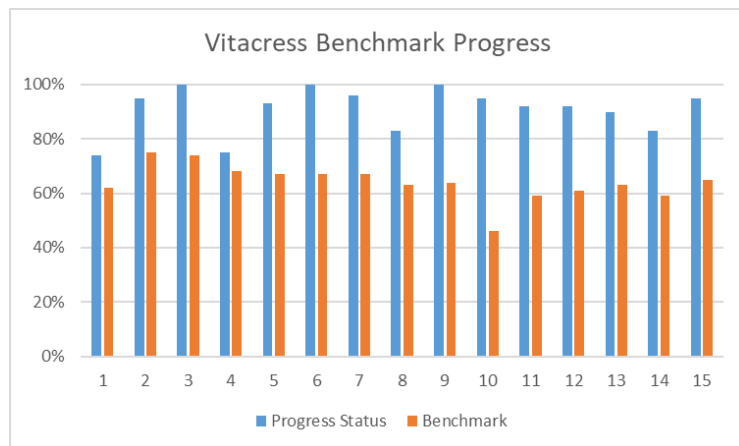
Raw material sourcing can include products from countries classed as high risk in terms of potential human rights abuses. To support risk assessment and due diligence, all programmed raw material suppliers are registered on SEDEX.

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 enable Vitacress to drive continuous improvement in its own operations, and across its end-to-end 3rd party supplier network.

5. Measuring effectiveness



The Stronger Together 360-degree Self-Assessment tool is 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 an improvement in our overall progress status to 89%, benchmarking above comparators in all 15 areas.

Note: Stronger Together self-assessment is against the Six-Stage Strategy and Due Diligence Framework (1) and Responsible Recruitment and Fair Work Standards (2-15). It enables Vitacress to embed responsible recruitment and fair work free from exploitation in our operations and end-to-end supply chain. For more information go to: <https://www.stronger2gether.org/stronger-together-360>



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 assistance through internal programmes and association with external organisations such as CLAIM support centre in Odemira (Centro Local de Apoio à Integração de Migrantes).

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.

We actively promote grievance and whistleblowing channels that are available to all workers to report their concerns. This includes retailer confidential reporting lines and Vitacress' own 'Speak Out' 3rd party reporting channel.

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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