

Modern Slavery Statement

2025 - 2026

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CEO Statement

For more than 150 years, our purpose has remained clear: to help people live longer, healthier lives. Today, that ambition is about enabling health and wellness people can trust and helping people make informed choices that support better health every day.

That trust begins long before a product reaches our shelves. It depends on the integrity of the people, suppliers and systems behind it. Respecting human rights and working to prevent modern slavery are therefore fundamental to how we do business. They are part of delivering health and wellness responsibly, and part of earning the confidence of our customers, colleagues and partners every day.

Global supply chains are complex, but complexity cannot become an excuse for lower standards. Wherever we operate, or wherever our products are sourced, we expect people to be treated fairly, safely and with dignity.

Meeting that expectation requires robust governance, strong partnerships, effective due diligence and a willingness to keep raising standards across our operations and supply chains.

Over the past year, we have continued to strengthen the way we identify, assess and respond to potential human rights risks. We have enhanced our due diligence processes, deepened engagement with suppliers, and invested in stronger governance, better data and greater transparency across our value chains. These are practical actions that help us make better decisions, manage risk more effectively and reinforce the trust placed in our business.

This is our tenth Modern Slavery statement and an opportunity to provide a clear and honest account of the progress we have made and the work that remains.



ANTHONY HOUGHTON
Group Chief Executive Officer
Holland and Barrett

We recognise that protecting human rights is an ongoing responsibility rather than a destination. As expectations evolve, so too must our approach.

The pages that follow set out the actions we have taken during the year to strengthen our policies, governance and supplier relationships, together with the priorities that will guide our work in the years ahead. While we know there is always more to do, we are confident in the direction we have set and remain determined to build supply chains that reflect the standards our customers expect and the values we stand for.

Key Achievements Summary FY25

01. Established a cross-functional Human Rights Working Group with Senior Leadership to strengthen governance, accountability, and risk management across supply chains to establish a unified approach to identifying, preventing and mitigating human rights risks.
02. Strengthened supplier onboarding and due diligence by leveraging new commercial technology systems, including our internal Vendor Portal alongside third-party tools such as Ideagen's supply chain monitoring platform and EIQ's Sentinel risk monitoring software.
03. Conducted salient Human Rights Impact Assessments on key ingredients including fish oil, bovine collagen and manuka honey and mapping of tea and coffee.
04. Completed second year of palm, soy, and cocoa supply chain mapping with 3Keel to improve traceability, deforestation and identify modern slavery risks.
05. Embedded stronger responsible sourcing "guardrails" for high-risk commodities and own-brand ingredient sourcing through New Product Development.
06. Commenced certification and traceability of own-label Omega-3 fish oil against credible Friend of the Sea (FOS) standards, covering environmental sustainability and social accountability across omega-3 & marine collagen.
07. Expanded supplier audit and remediation programme for own brand with audits achieving 75% yellow and green as highest audit ratings.
08. Delivered more than 1,100 + ESG and modern slavery digital learning courses through LRQA EiQ Learn platform.
09. Achieved 81% completion of Modern Slavery awareness training among UK-based colleagues.
10. Study commenced on salient human rights risk assessments of top 50 ingredients

Modern Slavery Statement 2025/26

At Holland & Barrett we have a long-standing commitment to protecting human rights and combatting Modern Slavery in the United Kingdom (UK) and overseas supply chains. Modern slavery, including slavery, servitude, forced labour and human trafficking, remains a serious and growing global concern affecting economies and supply chains worldwide. Modern slavery is fundamentally unacceptable within our business and value chain, and addressing it, is a core part of our broader human rights and responsible sourcing commitments.

This statement on Modern Slavery and Human Trafficking is made in accordance with Section 54(6) of the Modern Slavery Act 2015 and covers Holland & Barrett International Limited and Holland & Barrett Retail Limited, which includes subsidiaries in Benelux as well as Asia which includes H&B Trading Shanghai Co Ltd & H&B Asia Limited operating for Holland & Barrett. Our last statement was approved by the Boards of Holland & Barrett International Limited and Holland & Barrett Retail Limited on 30th September 2024. The current Modern Slavery statement is for the financial year ending 30 September 2025.

Introduction

At Holland & Barrett, we recognise the responsibility to prevent, mitigate and remediate Modern Slavery as understood and carried out under the United Nations Guiding principles (UNGP). We have taken a pledge to have a zero-tolerance approach to Modern Slavery, and we are committed to the prevention, deterrence, and detection of Modern Slavery within our business and supply chain.

We are in our second year as members of the United Nations (UN) Global Compact (UNGC), upholding its ten principles across Human Rights, Labour, Environment and Anti-Corruption - including Principle 4, which calls for the elimination of all forms of forced and compulsory labour.

This year we introduced our Sustainability & Impact strategy, shaped by the double materiality assessment completed last year. It establishes a strong foundation built on three pillars: Planet, People, and Product, which now guide how we prioritise and deliver impact across the business. Modern slavery and human rights are embedded across all three pillars of Holland & Barrett's Sustainability & Impact Strategy — protecting People through safe, fair, and ethical working conditions; supporting Product integrity through responsible

sourcing and supply chain transparency; and strengthening Planet goals by building resilient, sustainable supply chains that respect both people and the environment.

Through the roll out of the strategy, we have strengthened our internal standards for own-brand ingredient sourcing, raising expectations around traceability, supplier due diligence, and ethical practices. This has enabled us to more effectively identify and mitigate modern slavery risks within our supply chains, particularly in high-risk agricultural and raw material sourcing regions. To deepen this understanding further, this year we are commencing work on a salient human rights risk assessment of our top 50 ingredients.

Our Business and Structure

The Holland & Barrett International Limited group was established in 1870 and has grown into one of the world's leading health and wellness retailers and the largest in Europe, supplying its customers with a wide range of vitamins, minerals, health supplements, specialist foods and beauty products. The H&B Group are part of the Letter One Group. Holland & Barrett Retail Limited is a 100% owned subsidiary of Holland & Barrett International Limited. Holland and Barrett operate globally, key markets include (UK, ROI, Netherlands and Belgium and China) and operating internationally through franchise and distribution partners in other countries.

Our vision is to be the trusted partner for over 100 million people globally to achieve their personal health and wellness goals, adding quality years to life. We have an incredible team of over 7,800 colleagues across Europe in our 1,300 + stores and support functions operating within over 19 countries across the world including owned and franchise stores, the business has a strong, consistent brand ethos combined with expert customer advice to be the highly trusted health and wellness brand that we are today.

Our strategy remains centred on our purpose and is delivered through several core priorities:

- Helping people improve their health and wellbeing today through high-quality products, trusted advice and an expanding service offering.
- Driving omnichannel growth with a data led, scalable model that delivers a fully integrated digital and offline experience.
- Embedding wellness solutions into our core business, supporting customers with prevention, diagnostics and personalised guidance.
- Expanding into international markets, building on proven commercial models and customer insight.

Our wholesale business continues to be an important growth driver, extending Holland & Barrett's brand, products and expertise into new channels through strategic partnerships.

We have established successful wholesale relationships with partners including **Ocado**, **Co-op** and **WHSmith**, enabling us to reach a broader customer base while maintaining our commitment to quality, responsible sourcing and product integrity.

We also collaborate with leading global brands through contract manufacturing and supply partnerships, including partnerships with organisations such as **Nestlé**, leveraging our expertise in health and wellness products.

H&B also operates a dedicated manufacturing and packing facility known as the Global Production Centre (GPC), located in Burton-on-Trent, UK. This 133,000 square foot facility acts as the central hub for producing, blending, and packaging vitamins, minerals, and health supplements (VHMS), for our own and third-party big brands internationally. GPC prioritise scale and responsibility hand in hand. The site is built to produce up to 70 million units a year, but it is the people behind the lines that make the difference. The unit is committed to upholding human rights throughout its operations and supply chain through robust policies, ethical sourcing standards, and responsible labour practices. This includes policies covering human rights, modern slavery, child labour, health and safety, ethical recruitment, whistleblowing, and worker welfare. All bulk suppliers to GPC are required to meet third-party ethical audit standards, supporting responsible sourcing beyond our own operations and reinforcing a strong commitment to human rights across the business.

Our supply chains

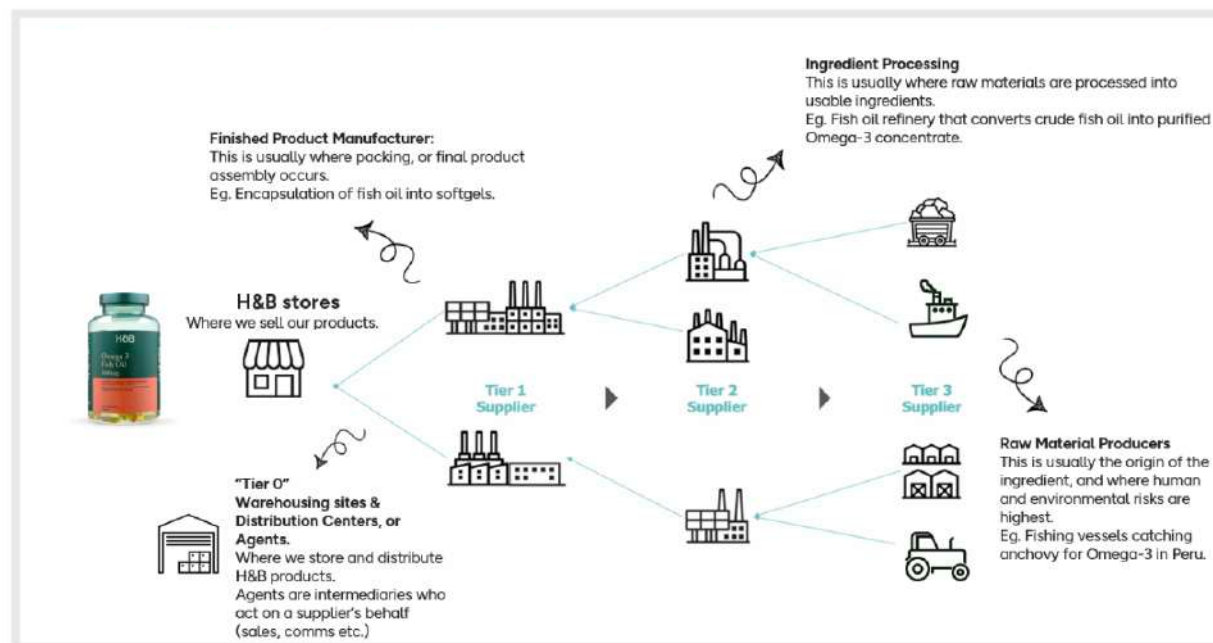


Fig 1. An example of an Omega supply chain

Holland & Barrett's supply chains are global, diverse, and complex, reflecting the breadth of our health and wellness offerings. We operate a tiered supply chain approach, from finished product manufacturers and ingredient processors through to raw material producers. This enables us to apply risk-based due diligence, responsible sourcing standards, ethical audits, and modern slavery monitoring across different levels of our value chain. The above is an example of our Omega 3 supply chain.

Our supply chain includes:

- 01.** Own-brand finished goods suppliers across vitamins, minerals, supplements, sports, food, beauty and wellness products.
- 02.** Raw material and ingredient suppliers, including high-risk commodities such as fish oil, collagen, honey and botanicals.
- 03.** Global Production Centre suppliers supporting our UK manufacturing, blending, packing and co-packing operations.
- 04.** Branded product suppliers who supply third-party health, wellness and beauty products.
- 05.** Goods Not for Resale suppliers covering logistics, facilities, technology, HR, marketing, packaging and professional services.
- 06.** Wholesale and commercial partners including Ocado, Co-op, WHSmith, Tesco and contract manufacturing partnerships.
- 07.** Branded marketplace online sellers.
- 08.** International franchise and distribution partners and trading entities operating in global markets.

Our People

We have a long history of caring for our workforce and putting colleague voices at the heart of our decision-making. Last year we developed the Colleague Network built around three simple ideas linked to our values: connection, awareness and change. The network exists to forge connections for our colleagues and build psychological safety, creating a supportive community. It fosters an educative approach supporting company learning and boosting awareness of key issues that affect a range of our people. This drives informed and strategic change for the company, supporting equity and inclusion for our diverse colleagues and the communities we serve. Our Colleague Network, called Better Together, is sponsored by CEO Anthony Houghton and is made up of over 250 colleague members, growing daily. The network sits inside our wider governance structure for DEI, ensuring each member can engender change within the business. Every year we conduct feedback from our employees through the Voice colleague engagement survey.

Governance

The overall accountability for the Modern Slavery Statement and risk assessment process is held by the Executive Committee who has the delegated authority and responsibility of Holland & Barrett International Limited for the prevention, deterrence and detection of unethical practices within the supply chain. Responsibility for the policy rests with the Holland & Barrett Executive Management Committee.

As a business we are committed to upholding human rights and support in full, the conventions such as the United Nations (UN) Universal Declaration of Human Rights, International Bill of Human Rights, International Labour Organization (ILO) Core Conventions, the United Nation Guiding Principles of Protect, Respect and Remedy (UNGP) and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

To strengthen accountability, we also established a cross functional Human Rights Working Group in FY25 to monitor risk, track progress and drive action across our business and supply chains led by the Group Head of Product, Sourcing and Technical division. The Human Rights Working Group strengthens human rights commitments by providing a cross-functional forum to align on salient risks, high-risk commodities, and best practices, while ensuring alignment with international standards and due diligence legislation. The working group will also drive learning by linking human rights with climate strategies and tracks progress on key initiatives to resolve challenges and accelerate implementation.

The Group's inaugural Double Materiality Assessment (DMA), undertaken through engagement with internal and external sustainability experts and a broad range of stakeholders, identified S1 Own Workforce and S2 Workers in the Value Chain as material sustainability matters. The results have directly informed the development of our sustainability strategy, guiding our strategic priorities and programmes to strengthen workforce wellbeing, human rights due diligence, supplier engagement, and responsible business practices throughout our operations and value chain.

Our most material sustainability topics:

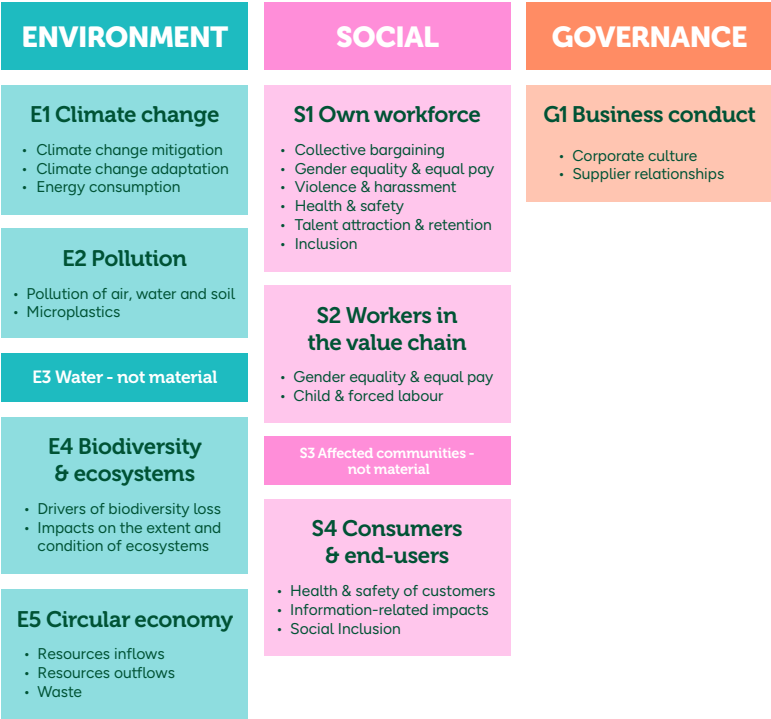


Fig 2. Sustainability with Material Social and Human Capital Topics

Our Policies

We do not compromise on human dignity. We have a number of internal policies relevant to modern slavery. This includes but is not limited to internal policies that support fair and ethical employment practices, including Health & Safety, Equality, Diversity and Inclusion, Wellbeing, Recruitment, Grievance, and Family Leave policies. These policies are available on the Buzz which is our internal share point.

Global supply chains are complex, but that is not an excuse for lower standards. We have several policies that ensure fair labour and safe working conditions are communicated internally and externally. In FY25, we reviewed and updated all colleague and store policies across the UK, Benelux and Ireland to ensure alignment with legal requirements and best practice. Our core business and supply chain policies related to human rights include:

Human Rights Policy	Supplier Code of Conduct	High Risk Ingredient Policy	Child labour Policy	Deforestation Policy	Animal Welfare Policy
• Policy highlights commitment that is aligned with global frameworks which includes the UN Declaration of Human Rights, ILO Core Conventions, UNGPs, and OECD Guidelines. We have zero tolerance for human rights abuses and take all allegations seriously. Human rights principles are embedded into our policies, procedures, and day-to-day business practices.	• The code sets minimum commitments that are focused on key policy areas affecting H&B, to ensure we act in line with relevant laws and regulations, industry standards and stakeholder expectations. The code applies to all suppliers - GFR, GNFR, Marketplace, International and Franchise partners and our overseas sourcing offices.	• High-Risk Ingredients Policy outlines a risk-based approach to sourcing commodities with potential environmental, social, and human rights impacts. It applies across some of the key ingredients which we have identified as high risk such as palm, soy, cocoa, timber, fish oil, coffee, tea, and collagen, with clear expectations for suppliers.	• We have zero tolerance for child labour across its operations and supply chain. A risk-based approach is applied to identify, prevent, and address child labour risks, supported by audits, traceability, and continuous monitoring.	• Policy recognises that deforestation is not only an environmental issue but also a human rights risk, often associated with land rights violations, forced labour, and impacts on local communities and indigenous peoples.	• Policy links directly to human rights by addressing risks often associated with animal-based supply chain such as forced labour, unsafe working conditions, and impacts on communities and ecosystems—ensuring both people and animals are treated with dignity and respect.

Fig 3. Policies

These policies reflect our dedication to implementing and enforcing robust systems and controls across various supplier categories, including Goods for Resale (finished products and raw materials for the UK, ROI, and Benelux), Goods Not for Resale (for the UK, ROI, Benelux, and China), International Franchise Partners and Marketplace. Our efforts specifically target combating modern slavery in high-risk commodity supply chains. All suppliers and partners sign the policies as they go through the onboarding process.

We continue to include specific prohibitions against the use of Modern Slavery in our contracting process through our risk:

- in our Standard Terms of Purchase.
- in our negotiated supplier partner agreements; and
- with our franchise partners and wholesalers.

The Vendor portal data management system within our business stores the responsible sourcing supply chain policies and Terms & Conditions (T&C's) which is signed by the supplier as a part of the supplier onboarding process.



Risks and Actions – Progress Against Last Year

This section outlines the actions we have taken over the past year to strengthen our approach to preventing modern slavery across our supply chains. It highlights improvements to supplier onboarding, ingredient integrity, audit processes, due diligence for GNFR and franchise partners, and the training and capacity-building measures that support our wider human rights commitments.

01. Strengthening Supplier Onboarding

Last year, we improved our supplier onboarding processes by collaborating with our new H&B digital systems such as Vendor Portal and integrating these with supply chain monitoring systems through Ideagen and Impact Buying, which are data platforms, to manage supplier due diligence. These improvements were made in all categories across the UK, ROI, Benelux, International Franchise partners, and China to support stronger data integrity and centralised information management. We have begun incorporating recognised sustainability certification schemes into our supplier onboarding process to strengthen responsible sourcing practices. We are also working closely with our New Product Development (NPD) team to embed sustainability considerations earlier in the product development process.

This year, the marketplace business model was introduced to H&B. We maintained our due diligence commitment by overseeing marketplace seller onboarding from a sustainability perspective. Seller risk is mitigated through the EIQ AI Sentinel tool which continuously monitors global news sources and flags any sustainability related adverse media mentions related to supplier business activity or process. This proactive stance not only helps in mitigating immediate risks but also in building a more resilient and sustainable supply chain in the long run.

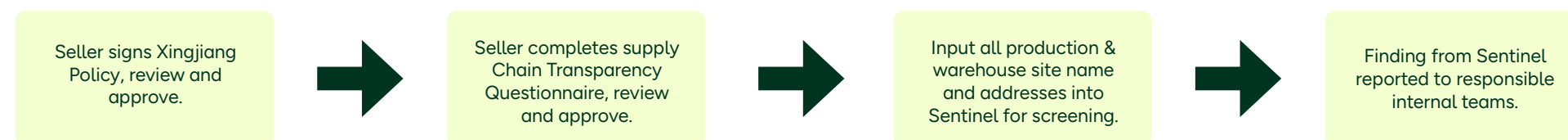


Fig 4. Market place due diligence process

02. Ingredient Integrity through our Sustainability and Impact strategy

This year we established our Ingredient Integrity approach, stemming from our newly formed Sustainability and Impact strategy.

Ingredient integrity influences every own brand product that reaches the shelf. It is the discipline of choosing ingredients with purpose, understanding where they come from and being accountable for the impact they create. Our approach is grounded in continuous evaluation. Every formulation begins with a consumer need and is evaluated through three connected lenses: scientific evidence, regulatory compliance which includes quality control and responsible sourcing.



Global Sourcing: **Our Global Sourcing Team** plays a critical role in supporting sustainable growth and innovation by building a resilient, high-performing global supply base. This includes supporting our efforts to identify, assess and address modern slavery and human rights risks across our supply chain. Products and ingredients are carefully selected and evaluated against clear standards covering sustainability, quality, regulatory compliance, and respect for human rights and labour practices. Through long-term supplier partnerships, we work to strengthen supplier capability, improve performance, and enhance resilience across our value chain. In FY25, we delivered eight strategic supplier capacity-building workshops to better understand supplier capabilities, drive continuous improvement, and strengthen performance, with a particular focus on sustainability and responsible sourcing practices.

We commenced defining the scope of critical commodities and raw materials used within our products by assessing their salient human right risks. This work is guided through our high-risk commodity policy and aligned with several upcoming regulations, including Corporate Due Diligence Directive (CSDDD) and EU Forced labour regulation (EUFLR). Under the EUFLR, any product found to be linked to forced labour can be prohibited from being placed on or exported from the EU market.

Fig 5. Our Approach to Ingredients

Case Study: 3Keel Commodity Mapping

Palm, Soy and Cocoa Mapping: We participated in 3Keel's annual collective supply-chain mapping programme for high-risk commodities. Through risk analysis and detailed ingredient mapping, 3Keel identified gaps in our supply chain without certifications linked to potential forced labour, deforestation risks, child labour and land rights concerns across key sourcing regions.

We have now completed our second year of reporting on our own-brand Palm, Soy and Cocoa. This process is strengthening our visibility beyond tier 1 suppliers and helping us build a more robust, risk-led approach to human rights across our supply chains.

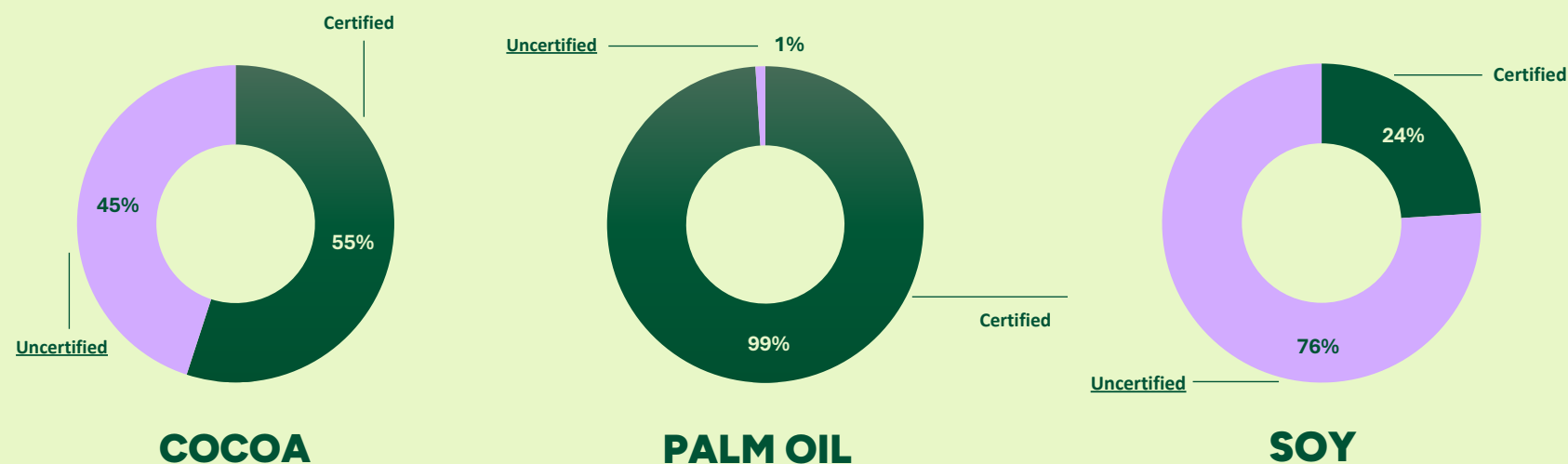


Fig 6. Our case study was also published on the 3Keel website about our work on transparency and sustainable sourcing process

Human Rights Impact Assessments

To gain a deeper understanding of how our supply chains impact the people who work within them and the communities that surround them, we conducted Human Rights Impact Assessments on some of our key ingredients.

Omega 3 Fish Oil:

Fish oil is a key high-value category for us. Last year, we conducted a Human Rights Impact Assessment with Ergon Associates to strengthen our approach to human rights across the supply chain. Through commodity mapping and risk analysis, we identified key structural drivers of risk.

Findings highlighted hazardous and isolated working conditions, informal employment, and limited worker representation in the fishing sector as salient potential risks which may occur in our supply chains. Reliance on migrant labour via unregulated channels, alongside weak governance and corruption, increases risks of exploitation, poor labour practices, and modern slavery.

In response, we are mapping suppliers and mitigating risks through stronger due diligence and engagement with credible partners. Key actions include embedding human rights “guardrails” into product development and consolidating supply chains around long-term partners to improve traceability and transparency. We also commenced our certification programme through the Friend of the Sea (FOS) chain of custody programme which include both **environmental sustainability** and **social/human rights requirements** across our fish oil, and marine collagen supply chain.

		Fishing	Processing	Refining and encapsulation
	Child labour	Peru	Peru, Senegal	
	Forced labour	Peru, Senegal, Mauritania	Peru	China
	Freedom of association and collective bargaining	Oman, Morocco	Morocco, Peru	China
	Gender-based violence and harassment			China
	Non-discrimination		Morocco, Western Sahara	China
	Occupational Health and Safety (OHS)	Peru, Mauritania, Senegal	Peru, Mauritania	China
	Right to a healthy environment	Peru	Peru, (all) Sub-Saharan Africa	
	Right to food	Mauritania, Senegal		
	Right to an adequate standard of living	Morocco		
	Right to an effective remedy			China
	Right to health			
	Right to life			
	Right to self-determination	Western Sahara	Western Sahara	
	Wages and working conditions	Peru, Morocco	Peru, Mauritania	China

Fig 7: Salient risks categorisation in fish oil supply chain

Bovine Collagen:

We also completed a risk assessment of our bovine collagen supply chain, identifying key traceability and transparency challenges. Significant gaps make it difficult to verify the origin of hides beyond the tannery or extraction stage. Unlike fish collagen, there are no established third-party certification systems, and limited collaboration across the meat and leather sectors further constrains progress. Market volatility driven by cattle availability, feed, energy costs, and climate factors also impacts supply security.

To address these risks, we are enhancing supply chain mapping to improve visibility to slaughterhouse and, where possible, farm level. We are shifting sourcing towards lower-risk regions such as the UK and EU, strengthening partnerships with preferred suppliers, and exploring potential certifications. We have also commenced looking at the closest certification for hides and tanneries, Leather Working Group (LWG) which looks at traceability of leather raw materials, working conditions along with environmental considerations. We are currently establishing stronger guardrails for bovine collagen suppliers to ensure higher standards of responsible sourcing, environmental sustainability, and ethical supply chain practices.

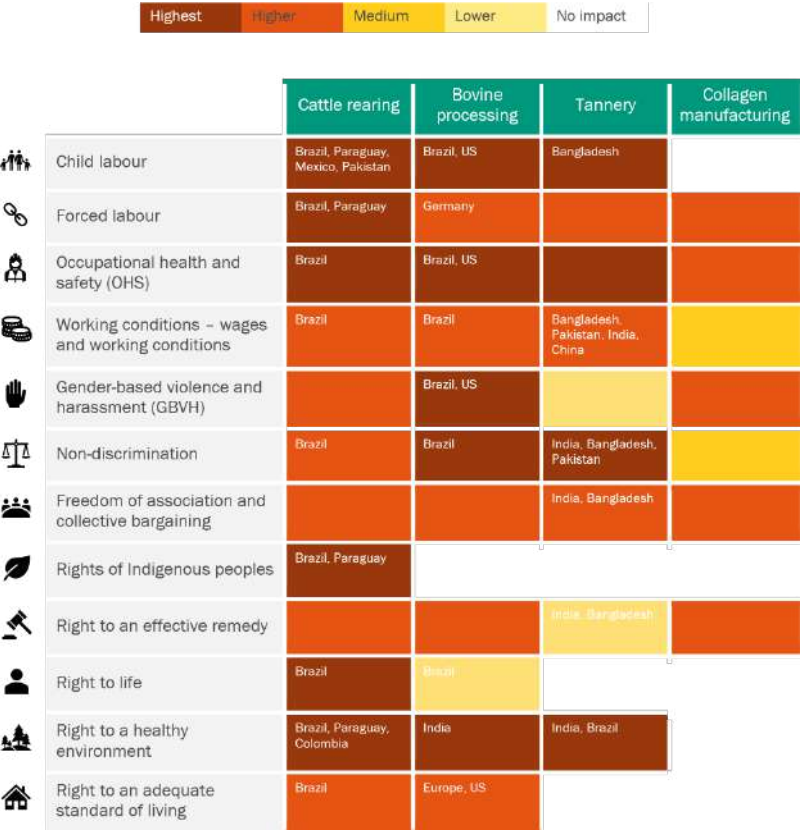


Fig 8: Salient risk categorisation of Bovine Collagen

Manuka Honey:

The manuka honey study identified key opportunities to strengthen due diligence by integrating human rights indicators into supplier processes, such as beekeeper visits, with a focus on migrant worker conditions and accommodation standards- areas closely linked to risks of modern slavery, including forced labour and exploitation. It also highlighted challenges around ingredient authenticity, fragmented data, and inconsistent traceability, which can obscure visibility of modern slavery risks in complex supply chains. Balancing commercial demand with responsible sourcing remains a key challenge, reinforcing the importance of long-term supplier partnerships and early integration of human rights into sourcing and product design. Strengthening cross-functional collaboration and evidence-based transparency is critical to preventing modern slavery and meeting expectations under frameworks such as the UK Modern Slavery Act.

Tea:

We source our tea from Sri Lanka and have mapped our supply chains and looked at factors that can increase vulnerability to modern slavery risks, including forced labour, debt bondage, and worker exploitation. This reinforces the need for strengthened due diligence, responsible purchasing practices, and collaborative, long-term engagement with suppliers to address root causes and support decent working conditions in line with the UK Modern Slavery Act.

Coffee:

We source our coffee from a UK based processor who source beans from Ethiopia, East Africa and have conducted risk assessments to verify any modern slavery issues.

Top 50 Ingredients:

This year Holland & Barrett commenced scoping of its top 50 ingredients to identify salient human rights risks, including forced labour, child labour, and gender discrimination. The analysis maps average risk levels by sourcing country, enabling identification of broader geographic risk patterns, while also flagging specific ingredient–country combinations requiring deeper due diligence. This approach supports a more targeted response to potential modern slavery risks within complex supply chains. The study will continue into FY26 & 27 to further strengthen risk identification and inform ongoing responsible sourcing actions.

Forced labour risk by country

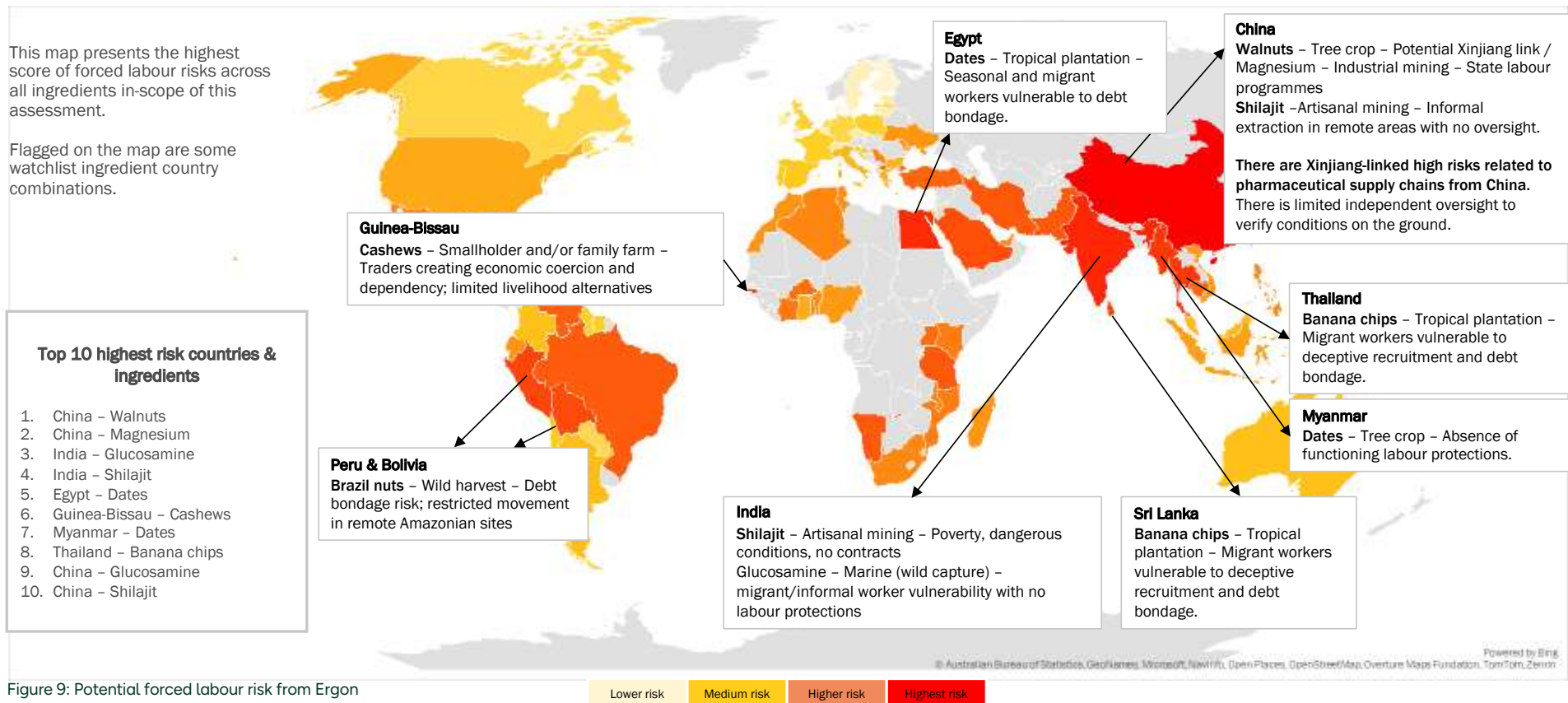


Figure 9: Potential forced labour risk from Ergon

03. H&B Audit Programme

As a minimum, we require that working conditions for those working within supply chains comply with our Supplier Code of Conduct which requires them to become members of Sedex and complete a site SAQ. We continued with the grading process for suppliers in line with Sedex methodology and created the traffic light system of Green, Yellow, Amber and Red on issue criticality.

Supplier audits are practical checks to ensure our partners treat workers fairly, maintain high standards and protect the environment. Our approach aligns with international standards, including the UN Guiding Principles on Business and Human Rights and International Labour Organisation guidelines. We audit to understand, support and improve. Audits and independent third-party certifications help ensure responsible sourcing across our own brand supply base. At the time of writing this report, 75% of audited own brand suppliers achieved our highest ratings. We work closely with suppliers to address Non-Compliances (NC'S), findings, and prevent recurrence. Remediation is not a box-ticking exercise. It is how we create safer, fairer workplaces and uphold the trust behind every product.

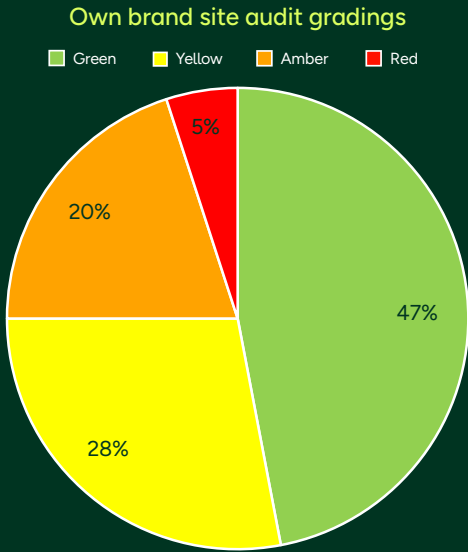


Fig 10: Own-brand site audit gradings

04. Continue monitoring Goods Not for Resale (GNFR) suppliers and International Franchise supply chains through our improved risk-based approach to due diligence

We continue to monitor our goods-not-for-resale (GNFR) suppliers and our international franchise partners. GNFR covers the products and services required to run our business, including Logistics, Operations, Marketing, Technology, HR, Property, Facilities Management and Packaging. New GNFR partner suppliers go through our supplier onboarding process, and we continue to risk assess our existing supplier base prioritising our top 80% spend.

05. Learning and Capacity Building

We believe training and capacity building is an important step in raising awareness of modern slavery risks and mitigation steps within our business and supply chains.

The Hive is Holland & Barrett's internal training platform, enabling the organisation to assign out compliance training, alongside support self-directed development content. "Preventing Human Trafficking" course was assigned out to all our Hubs and Distribution salaried colleagues in last year with a total number of 1,112 colleagues completing the training on modern slavery.

We recognise that training needs to be provided regularly in line with both operational and personnel changes in the value chains. Our supply chains are unique, comprised of small medium enterprises (SME) and there has been recognition within our business of a lack of awareness of modern slavery risks through our current risk assessments. We work closely with our Human Resources teams to get a monthly list of new starters under commercial and conduct internal training sessions which cover modern slavery.

We continue to use digital training through our global partner LRQA through their EIQ learn platform as a comprehensive learning management system. The courses help businesses understand their ESG risks, issues on forced labour, modern slavery and promote sustainable and compliant practices throughout the supply chain and remediate issues where they are found.

All our own label and top 80% of our branded suppliers have been given access to these courses, with more than 1100 courses completed to date.

We also provide onboarding support for new suppliers through weekly drop-in sessions where we introduce them to our Sustainability & Impact strategy to ensure they are aligned with our policies and values from the beginning of their journey with us. We have conducted 80 new supplier onboarding training and drop-in sessions to date

Raising awareness of **Modern Slavery**, within our business and our supply chains, is an important part of our Sustainability and Impact strategy. We know that identifying potential and actual cases requires upskilling colleagues and suppliers to understand the drivers and indicators of modern slavery.

Finally 81% of our UK based colleagues have completed training, including those from key areas such as facilities and our distribution centres to increase awareness and confidence in being able to identify signs of Modern Slavery within our supply chains and how to report any concerns, this includes making colleagues aware of the whistleblowing helpline.

06. Sustainable attributes:

This year, under the product pillar of our Sustainability & Impact strategy, we have committed that our top 100 own-brand products will carry at least one credible sustainable attribute, establishing this as the new baseline for our range. As part of this process, each product will also undergo a review of its human rights and social sustainability considerations to ensure it meets our strengthened expectations.

Other activities

Enhancing Due Diligence within our operations

We continue to monitor our own production site through Sedex self-assessment Questionnaire (SAQ) along with third party assessments (SMETA audit). Any gaps and opportunities on working conditions, policies and process are worked through a corrective action plan to close out any issues within periodic timelines. As a business we also act as a packing and distribution facility (Global Production Centre) for other global brands heritage with advanced co-packing capabilities and partnerships with leading supplement manufacturers. Responsible sourcing is fundamental to the production centre and labour standards, and human rights are embedded in the business, particularly in today’s environment of heightened stakeholder expectations, regulatory scrutiny, and broader ESG commitments.



Planet

We’re committed to reaching Net Zero by 2040, ensuring our climate goals meet the highest global standards. We believe human health depends on the health of the planet.



People

Expand access to trusted wellness advice, education and support, reaching at least 10 million people annually from 2030 across Holland and Barrett’s core markets.



Product

Our top 100 own-brand products will have at least one sustainable attribute (e.g. Transparency, Origin, Regenerative farming, Carbon reduction) by 2030.

Climate health

We believe the climate crisis is a health crisis. We are committed to leading climate action by reducing our carbon footprint in line with science.

Accessible wellness

We’re on a mission to make wellness simple and accessible to all, through offering free expert advice, and addressing other systemic barriers to quality life years.

Ingredients with integrity

We are on a mission to ensure our ingredients are led by science, reviewed by our experts, responsibly sourced and proven to back your body.

Thoughtful design

We design with intention by creating products, packaging, and experiences that reduce environmental harm, support circular systems, and enhance wellbeing.

No body left behind

We believe in leaving no body behind, by embedding diversity across our people, products, and platforms, so everyone feels represented and respected.

Supply chains that LiveWell

We are building supply chains that protect people, respect the planet, and stand the test of time in a transparent way through our unique LiveWell program.

Fig 11. Our Sustainability & Impact Strategy

Supplier Due Diligence in Supply chains

We have continued the supplier due diligence process for existing suppliers for Goods for Resale (GFR) retrospective suppliers, Goods Not for Resale (GNFR) and service providers, International Franchise and Market place partners.

In the UK, ROI and Benelux we have more than 700 direct suppliers who supply us with both own label and branded products. We check that our suppliers and their production locations meet our health and safety, business ethics, labour, and environmental standards through the Sedex Self-Assessment questionnaire (SAQ).

We have complete visibility of 100% of our own label suppliers under this category.

Systems such as Sedex enable us to capture essential supplier information, providing insight into management systems, workforce size and demographics, labour policies, grievance mechanisms, equal-opportunity practices, ethical recruitment, wages and working hours, contractual arrangements, and environmental policies and processes.

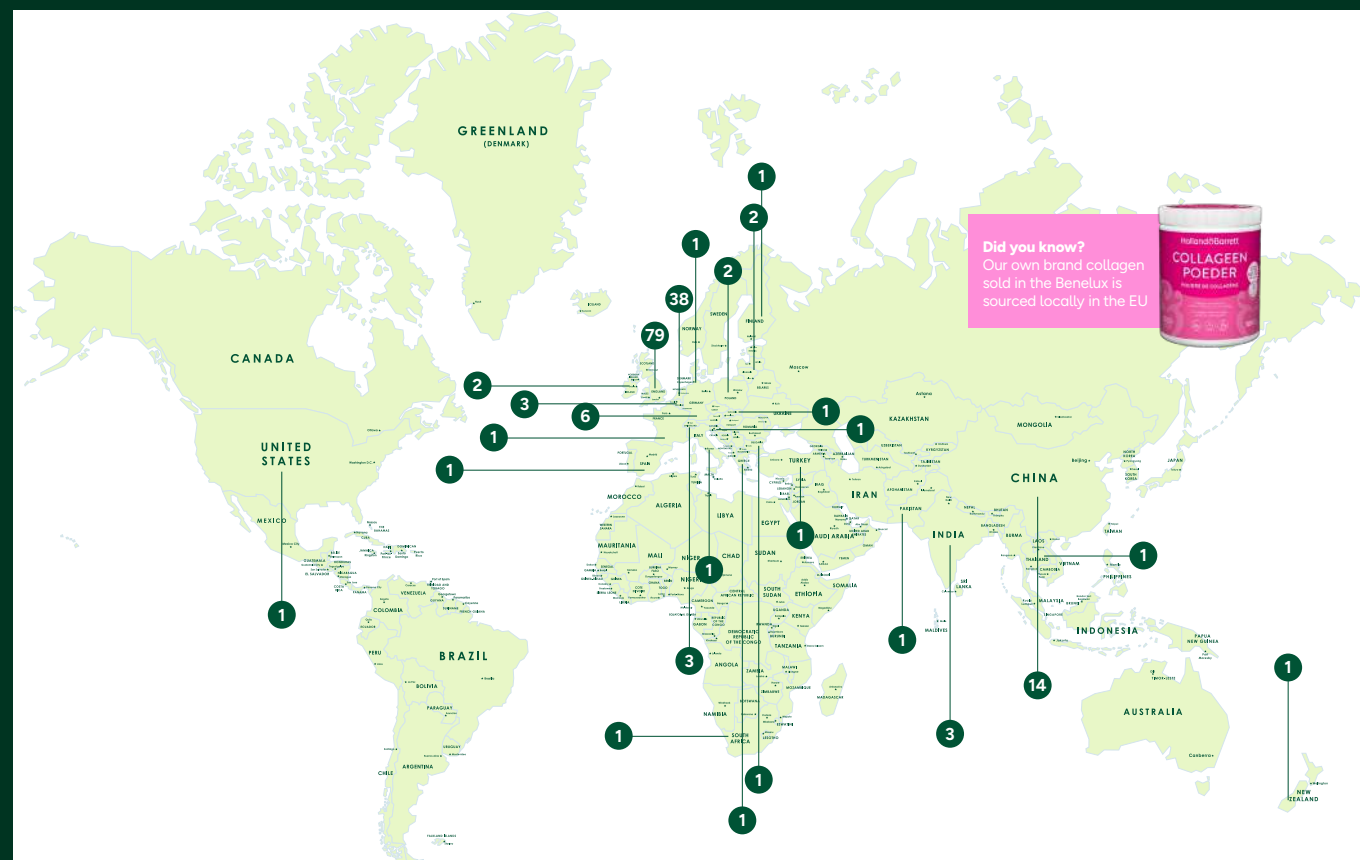


Figure 12. Count of Own-brand sites by country

Grievance & Reporting

We continue to feed into the Responsible Sourcing KPI report under own label sourcing targets to the Group Sourcing and Technical internal dashboard which is shared monthly with the senior leadership team. We also monitor and work with all high risk branded suppliers identified through our due diligence process. We also report to the UNGC yearly annual reporting. We will be publishing our first Sustainability and Impact report next year.

We expect our suppliers to follow the same prohibitions we follow, and to ensure their own suppliers do the same by cascading this information effectively. We reinforce this through our onboarding process, which sets standards and monitoring requirements.

- Our suppliers must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud.
- Workers shall not be required to pay recruitment, hiring, or other similar fees related to their employment; our suppliers must bear or reimburse to their workers the cost of any such fees. (Ref case study fig12)
- Our suppliers must not require workers to surrender identification passports, or work permits as a condition of working.
- Workers must be given clear, understandable contracts regarding the terms and conditions of their engagement in a language understood by the worker.
- Suppliers must use reputable staffing or recruiting agencies who also comply with the principles of the Holland & Barrett Supplier Code.
- Suppliers must remunerate fairly in line with local legislation or if better industry practice, paying workers for all hours worked.
- Suppliers must treat all colleagues with respect and dignity and comply with local legislation on disciplinary practices

ENDING HIDDEN RECRUITMENT FEES IN MALAYSIA: In FY24, an independent audit found that workers at an upstream supplier factory in Malaysia had paid over €3,000 each in recruitment fees paid by workers. We consider this unacceptable and not aligned with our standards. We acted immediately, working with the supplier and a local NGO to address the issue. Our expectation is clear: workers should never pay to secure employment. Workers are now being reimbursed over 48 months, a strict zero recruitment-fee policy has been implemented, and factory teams have completed ethics training. By making a zero-recruitment-fee commitment non-negotiable within our Supplier Code of Conduct and strengthening oversight, we are protecting workers' rights and reinforcing fairness not just in our own operations, but across our supply chain.

Fig 13. Case study on recruitment fees

Grievance Mechanism

We continue with our 'Speaking Up' Policy and hotline for all colleagues and suppliers to report knowledge or suspicions of unethical or unlawful behaviour. This ensures anyone who has concerns can raise them confidentially. Our hotline is available to report any suspicions our colleagues may have regarding Modern Slavery, and our colleagues are signposted to this in our posters, communications, training and other resources that we develop in relation to Modern Slavery.

Signposts for awareness and reporting are mandatory information for colleague notice boards across the organisation. Holland & Barrett also operates a confidential whistleblowing facility, offering a secure 24-hour hotline and an online platform where employees and suppliers can report concerns anonymously.

To support our international workforce, the reporting system is accessible in English, Dutch and French. The speak up template is referenced to the right.

H&B

Speak Up

Everybody's Responsibility

If you see something wrong,
you can report it
confidentially.

Report your
concerns by calling: 0800 096
4456(UK)

Prefer to let us know your concerns
online? Scan just below:



Fig 14. Speak up hotline for colleagues and suppliers

Supplier Engagement & Partnerships

This year we continued engagement with suppliers, conducting risk assessments on-site, looking at Health and Safety, wages, working hours, contracts, freedom of association, dormitories and canteens. We also reviewed their existing audits and corrective action plans. This includes not only own label suppliers but also branded suppliers in our supply chain

CASE STUDY:

Protecting workers' rights at a UK branded supplier:

A UK & European audit at a strategic branded group supplier identified human rights risks linked to unpaid work, air quality, failure in worker time records, health risk assessments, representation and treatment of agency workers. We required corrective action and worked with the factory to resolve all findings within agreed timelines. We set up regular catchup with the senior management within the factory to understand the root cause of issues. An effective management system was set up to address the issues with agreed timelines

Proper clocking in systems was established, responsibility for health and safety was allocated, dust exposure above safe limits was reduced through stronger controls and continuous air monitoring. An occupational health programme was introduced to safeguard respiratory health. A worker committee was established to strengthen worker voice, and oversight of agency labour was tightened.

Fig 15. Case study on Corrective Action Plan on branded partner

Preparation of upcoming legislations:

Holland & Barrett has continued to strengthen its approach to responsible sourcing in preparation for upcoming EU legislation. This includes the EU Forced Labour Regulation (EUFLR) and the Corporate Sustainability Reporting Directive (CSRD), aligned with the new European Sustainability Reporting Standards (ESRS). In addition, the Corporate Sustainability Due Diligence Directive (CSDDD) obligations beginning in 2029. This directive will significantly expand the EU's expectations of businesses on issues such as modern slavery, labour exploitation, human rights, environmental impacts, social standards, and long-term sustainability risk management.

As part of this preparation, we completed our Double Materiality Assessment, which confirmed the issues most material to our business and value chain. Our primary gaps against the ESRS relate to our own workforce (ESRS S1) and workers in our upstream and downstream supply chain (ESRS S2). These insights have shaped our approach to engagement, escalation, and remedy for material negative impacts across the value chain, with a particular focus on geographies and sectors at heightened risk of forced labour, child labour, and modern slavery.

We will continue to build on this work as we strengthen our systems, data, and supplier engagement to meet the evolving regulatory landscape.

Stakeholder Engagement & Key Partner Organisations

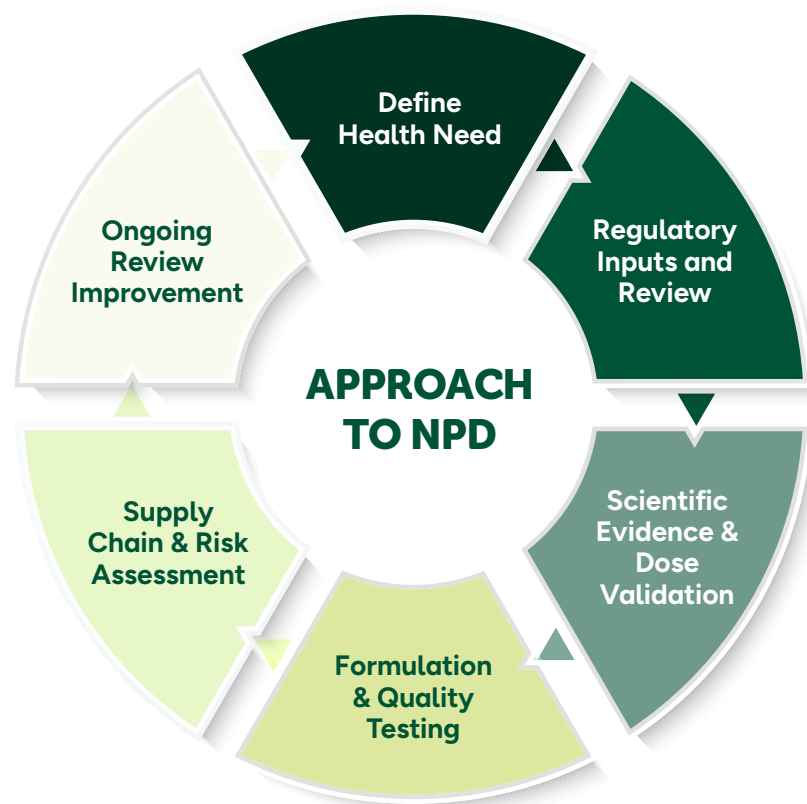
We work collaboratively with a broad range of stakeholders, including suppliers, NGOs, industry initiatives, certification bodies, trade unions, and expert partners, to strengthen our approach to preventing modern slavery.

Fig 16. A list of our key stakeholders

						
As a member of British Retail Consortium (BRC) we have also worked with industry experts who provide support for sustainable procurement and human rights topics. We sit on the Modern Slavery Working Group and support activities linked to industry engagement, advocacy, and lobbying initiatives aimed at strengthening human rights, ethical sourcing, and responsible supply chain practices	We are continuing to work with United Nations Global Compact as a member this year to align with the universal principles of human rights, labour, environment and anticorruption to action against societal goals which includes annual reporting. UNGC who are also custodians of the UN Sustainable development goals with goal 8 of decent work and economic growth to eradicate forced labour and end modern slavery and human trafficking.	Sedex provided us transparency platform for Global supply chain monitoring, auditing and data reporting	We use Ideagen previously called Authenticate supply chain transparency software that helps to map products to their sources, monitor suppliers, and measure risk.	LRQA / Elevate Global to conduct training on Forced labour who are a leading global provider of digitally enabled assurance services including environmental conformity assessments which includes their AI Sentinel tool	We continue to use 3Keel for supply chain mapping and traceability for soy, palm, and cocoa to identify sourcing origins and high-risk regions	We use Ergon an LRQA company to look at Human Rights Impact Assessments and Salient Risks of Ingredients as a part of our product transparency and Integrity

Forward looking objectives

Over the next 12 months we will continue to strengthen our approach to managing the risk of Modern Slavery within critical commodities and wider supply chains, to ensure that our Sustainability and Impact strategy is responsive to evolving risks. Some of these actions will sit within the New Product Development (NPD) stage gate process, so that we can capture these risks at an early stage, allowing us to act in addressing immediately any concerns that are identified.



In the coming year we have six key objectives, which form our Key Performance Indicators (KPIs):

- Continue utilising self-assessments, third-party audits, and AI-driven tools such as Sentinel to identify and address risks of modern slavery and human trafficking in our supply chain. Suppliers are required to strictly prohibit child labour and all forms of forced labour, including slave, prison, bonded, or indentured labour.
- Continue evaluating critical risk ingredients such as palm, soy, cocoa, bovine collagen and fish oil.
- Deeper study into top 50 ingredients from high-risk countries which includes mapping and understanding the salient risks and impacts.
- Continue developing our engagement strategy with own label supply chains including expansion of the H&B audit programme and engage with high-risk suppliers on corrective action plans.
- Enhance our capabilities and training systems including Modern Slavery awareness and due diligence training for our supply chains and colleagues.
- Developing our H&B Human Rights strategy.

Fig 17. Our approach to New Product Development

APPROVAL FOR THIS STATEMENT

**This statement was approved by
Holland & Barrett Board of Directors.**

Matthew Smith,
Director / General Counsel,
Holland & Barrett International Limited.