



MODERN SLAVERY STATEMENT

Holland & Barrett International Limited and Holland & Barrett Retail Limited (“H&B”).

Modern Slavery Statement of H&B

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery statement for the financial year ending 30th September 2018. This statement was approved by the Holland & Barrett International Limited board of directors on 28th March 2019 and the Holland & Barrett Retail Limited board of directors on 28th March 2019. Modern slavery is a crime and violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain (“Modern Slavery”).

OUR PLEDGE

We 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 within our supply chain. It is our policy to conduct all business activities with honesty, integrity and at the highest possible ethical standards. We are fully committed to implementing and enforcing effective systems and controls within our business and within our supply chain to continually challenge our ability to combat Modern Slavery.

OUR BUSINESS AND ITS STRUCTURE

The Holland & Barrett International Limited group of companies (the “H&B 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 ethical beauty products. The H&B Group are part of the Letterone group. Holland & Barrett Retail Limited is a 100% owned subsidiary of Holland & Barrett International Limited. H&B has over 7,000 employees and operates in 6 countries, UK, ROI, Netherlands, Belgium, Sweden and Singapore. H&B has a global annual turnover in excess of £36 million, including our subsidiaries

OUR POLICY

In 2016 we published our policy on Modern Slavery & Human Trafficking and our commitment to ensure that no Modern Slavery takes place in any part of our organisation or supply chain. Within the present financial year H&B has adopted internally a more formal Modern Slavery policy, the Modern Slavery & Human Trafficking Policy (the “Policy”), aimed at ensuring that no Modern Slavery takes place in any part of our organisation or supply chain. The Policy reflects our commitment to implementing and enforcing effective systems and controls aimed at combating Modern Slavery. We have brought the oversight of Modern Slavery within our

Holland & Barrett International Limited

Registered Office: Samuel Ryder House, Barling Way, Eliot Park, Nuneaton, Warwickshire CV10 7RH
Telephone: 02476 215 400

Governance Committee which has the delegated authority and responsibility of Holland & Barrett International Limited for the prevention, deterrence and detection of unethical practices within our organisation. Responsibility for the Policy rests with the Governance Committee. All reports of actual or suspected breaches of the Policy are reported to and investigated by the Governance Committee. Employees are encouraged to raise concerns, in confidence, about possible issues or suspicions of Modern Slavery within our organisation or supply chain. All credible reports of suspected misconduct are investigated by the Governance Committee.

SUPPLIER ADHERENCE TO OUR VALUES

In order to ensure that all persons within our supply chain comply with our values and zero tolerance policy on Modern Slavery, H&B has built a framework of measures to assess and monitor our supplier's conduct in respect to Modern Slavery. H&B has taken steps to include specific prohibitions against the use of Modern Slavery in our contracting process:

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

H&B Modern Slavery template clauses are being used with all new contracts. We expect our suppliers to comply with those prohibitions and hold their own suppliers to the same high standards. We have refreshed our supplier on-boarding process ("Doing Great Business Together ("DGBT")) and are proactively issuing all H&B raw material suppliers, branded product suppliers, and higher risk, higher value suppliers of indirect goods and services with questionnaires including a declaration asking for confirmation that they are adhering to the Modern Slavery Act and all its provisions. We have launched our new Supplier Code of Conduct where we commit publicly to addressing the risks of slavery and human trafficking within our supply chain. Our Supplier Code of Conduct is an integral part of our refreshed DGBT process. We evaluate and address risks of slavery and human trafficking in the Supplier Code which states, among other standards, that:

- Our suppliers must not use child labour or forced labour - slave, prison, indentured, bonded, or otherwise.
- Our suppliers must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. Working must be voluntary.
- 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.
- Our suppliers must not require workers to surrender identification passports, or work permits as a condition of working save only to the extent reasonably necessary to complete legitimate administrative and immigration processing.
- 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 H&B Supplier Code.
- Suppliers must remunerate fairly in line with local legislation or if better industry practice, paying workers for all hours worked.

- Supplier treats all employees with respect and dignity and complies with local legislation on disciplinary practices.

The launch of the DGBT process will be completed across H&B entire raw material and branded product supplier base by end Q2 2019 (approximately 600 suppliers). We have set up a dedicated process to review, assess and where necessary take further action to follow up any matters arising. H&B will use the outcome of the DGBT refresh process to better understand the maturity of its supply chain and to base the foundation for its supply chain risk assessment and audit plan for financial year 2019/2020.

DUE DILIGENCE PROCESS

The launch of DGBT in 2019 marks the roll out of our refreshed diligence procedures and is the platform for H&B to assess its suppliers and service providers for continued compliance and improvement. DGBT provides a stronger contractual basis for and commitment by suppliers to H&B audit requirements. Current audit procedures are in the process of being reviewed and updated to improve auditing for Modern Slavery. H&B audit calendar financial year 2019/2020 is being built alongside the wider supplier audit assessment needs for the business and will be rolled out in tandem. H&B has communicated its expectation for H&B to join SEDEX during 2019 and for its key suppliers, especially those in high-risk categories to become a member of SEDEX by 2021.

ASSESSMENT OF EFFECTIVENESS

Processes have been put in place during this financial period for all new raw material suppliers, branded product suppliers, and higher risk, higher value suppliers of indirect goods services as from Q2 2019, to be assessed for compliance with H&B's Supplier Code of Conduct before H&B begins ordering products or services. We expect moving forward all of these suppliers and service providers to meet or be working towards the standards in our Supplier Code of Conduct as a condition of doing business with us.

TRAINING

Employees take mandatory compliance training courses on Anti-Bribery Compliance and Tackling Modern Slavery. To date over 600 employees have received the online training. Logistics, distribution, warehousing, and other supply chain employees have also received awareness training in the form of team briefings tailored appropriately. We are in the process of refreshing the H&B Code of Business Conduct and Ethics which will be rolled out to all employees during 2019 and includes training on workplace harassment.

REPORTING

We have a 'Speaking Up' Policy and in 2018 have relaunched our Speaking up hotline for employees and suppliers to report knowledge or suspicions of un-ethical or unlawful behaviour. This ensures that anyone who has concerns has the means of raising these concerns confidentially. Our hotline is available to report any suspicions

our employees may have regarding Modern Slavery and our employees are signposted to this in our posters, communications, and other resources that we develop in relation to Modern Slavery. There is ongoing communication across the business to raise awareness of the speak up facility and the usage is monitored and compared to industry statistics to gauge awareness.

APPROVAL FOR THIS STATEMENT

This statement was approved by H&B Board of Directors. Signature of Lisa Garley—Evans, General Counsel Chair of Governance Committee.