



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 2019. This statement has been approved retrospectively in respect of the period by the boards of both Holland & Barrett International Limited the Holland & Barrett Retail Limited on 17th August 2021. 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 Colleagues 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. Last financial year H&B 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 continued commitment to implementing and

enforcing effective systems and controls aimed at combating Modern Slavery. The Policy has been approved and reconfirmed for this financial year.

Oversight of Modern Slavery during this financial year has moved from H&B Governance Committee to H&B Executive Management Committee which has the delegated authority and responsibility of Holland & Barrett International Limited for the prevention, deterrence and detection of unethical practices within our Supply Chain. Responsibility for the Policy rests with the Executive Management Committee. All reports of actual or suspected breaches of the Policy are reported to and investigated by the H&B Compliance team under delegated authority from the Executive Management Committee. Colleagues are encouraged to raise concerns, in confidence, about possible issues or suspicions of Modern Slavery within our organization or supply chain. All credible reports of suspected misconduct are investigated by the Compliance team and outcomes reported to the Executive Management 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 continue to on-board H&B raw material suppliers, branded product suppliers, and higher risk, higher value suppliers of indirect goods and services using our Supplier onboarding process ("Doing Great Business Together ("DGBT")) which includes compliance questionnaires and a declaration asking for confirmation that they are adhering to the Modern Slavery Act and all its provisions. Our Supplier Code of Conduct is an integral part of our 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 Colleagues with respect and dignity and complies with local legislation on disciplinary practices.

We have set up a dedicated process to review and assess supplier feedback and where necessary take further action to follow up any matters arising.

DUE DILIGENCE PROCESS

In 2019 we adopted DGBT which provides a stronger contractual basis for and commitment by suppliers to H&B audit requirements.

The current audit procedures have been reviewed and are due to be updated to improve auditing for Modern Slavery. This review and update is to be implemented alongside the refreshed H&B audit calendar financial year 2019/2020.

H&B has previously 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. These expectations were not met due to lack of resources within the business during this period to ready H&B for the necessary process change given the demands on the business for preparing to leave the EU. This has been rescheduled to be assessed following the UK exit from the EU ('Brexit') and the communications with suppliers have been updated to reflect this rescheduling.

ASSESSMENT OF EFFECTIVENESS

59 Suppliers have confirmed compliance with Modern Slavery laws during this period and evidenced policies, training and legally compliant employment contracts while also confirming legally compliant working hours and overtime practices. The relatively few smaller suppliers among our Supply Chain falling beneath the legal threshold for reporting that do not have Modern Slavery Policies in place, are directed to information and training to support the development of their compliance program.

TRAINING

All office-based Colleagues and Colleagues at the Distribution Centres whose role involves access to H&B computer systems continue to take annual mandatory online compliance training courses on Tackling Modern Slavery as well as Anti-Bribery Compliance and other Ethics and Compliance topics. Each year over 600 Colleagues receive the online training. Logistics, distribution, warehousing, and other supply chain

Colleagues also receive awareness training in the form of team briefings tailored appropriately.

All Colleagues receive some form of Modern Slavery awareness training on induction, and regular communications are made on the topic throughout the year.

REPORTING

We have a 'Speaking Up' Policy and in 2018 have relaunched our Speaking up hotline for Colleagues 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 Colleagues may have regarding Modern Slavery and our Colleagues are signposted to this in our posters, communications, 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 organization. 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

The Board noted the retrospective nature of the approval of this statement and the reasons put forward. The Board acknowledged the continuing work by H&B.

This statement was approved by the Board.

Signature of Matthew Smith, General Counsel, Secretary of the Board, Holland & Barrett Retail Limited and Holland & Barrett International Limited.