

## **UK Modern Slavery Act Disclosure Statement**

Whole Foods Market, Inc. was founded in Austin, Texas, but has continued to expand in the years since its inception. Fresh & Wild Ltd natural food stores opened in London in 1998 and was acquired by Whole Foods Market, Inc. in 2004. In line with the philosophy of its parent company, Fresh & Wild Ltd t/a Whole Foods Market (“Whole Foods Market”) is committed to responsible sourcing and eradicating forced labour and human trafficking from every aspect of its supply chain.

### **COMPLIANCE WITH APPLICABLE LAWS AND STANDARDS**

Whole Foods Market is committed to a policy of complying with the law wherever it does business and to maintaining high standards of business conduct. As such, Whole Foods Market expects its suppliers to conform to all applicable national and local laws, regulations, and published industry standards pertaining to supplier operations and employee relations.

### **LABOUR PRACTICES**

Whole Foods Market believes that all employees have a fundamental right to be treated with dignity and respect. Whole Foods Market condemns forced labour and human trafficking and will not knowingly work with suppliers who engage in these practices. Prohibited forced labour practices include slave labour, debt bondage, and involuntary servitude. Whole Foods Market defines human trafficking according to the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, which includes any act of “recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.” Whole Foods Market expects its suppliers to ensure that no forced labour or human trafficking exists in their business operations; to procure ingredients, raw materials, and other components for Whole Foods Market’s products from sources that do not utilize forced labour or human trafficking; and to not contract for the production of products for Whole Foods Market with subcontractors that utilize such practices.

### **AUDITING**

To evaluate supplier compliance with Whole Foods Market’s responsible sourcing standards, Whole Foods Market engages third party auditors to perform assessments of its suppliers’ facilities. These audits are performed according to internationally recognized social responsibility assessment standards, with an emphasis on suppliers of ingredients, raw materials, and other components used in Whole Foods Market’s exclusive brand products, and suppliers located in those countries where there is a high risk for forced labour or human trafficking. High risk audits are performed by independent third-party auditors who specialize in social responsibility audits and workplace condition assessments.

## **INTERNAL ACCOUNTABILITY**

All Whole Foods Market employees are expected to adhere to Whole Foods Market's Code of Business Conduct, which governs the legal and ethical standards for employee behaviour, including with respect to acceptable workplace practices.


## **TRAINING**

In the United States, Whole Foods Market, Inc. has implemented a training program regarding Whole Foods Market, Inc.'s responsible sourcing guidelines, which underlines its standards regarding forced labour and human trafficking. Whole Foods Market, Inc. is committed to continually evolving and expanding this training so that all necessary team members have the knowledge and tools to assess whether potential and current suppliers treat their employees and manage their operations in compliance with Whole Foods Market Inc.'s social responsibility standards. Responsible sourcing training documentation is available to all Whole Foods Market, Inc. employees who manage supplier relationships, and in-person training that is currently conducted in the United States will eventually expand to be conducted in the United Kingdom as well.

As Fresh & Wild Ltd t/a Whole Foods Market continues to engage with suppliers domestically and internationally, we remain committed to human rights and acceptable work conditions in our supply chain.

This statement was reviewed in 2019 by Whole Foods Market's Supplier Quality Assurance team on behalf of Fresh & Wild Ltd.

Acknowledged and Signed by:

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Albert Percival  
Director, Fresh & Wild Ltd