

## **Whole Foods Market's 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. In addition, Whole Foods Market expects its suppliers to adhere to its Supplier Code of Conduct, including requirements regarding labour rights and worker health and safety.

### **SUPPLIER CODE OF CONDUCT**

Whole Foods Market's [Supplier Code of Conduct](#) detail the requirements and expectations for suppliers in our supply chain, and suppliers contractually commit to these standards. They are derived from the UN Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights, the Core Conventions of the ILO, and the ILO Declaration on Fundamental Principles and Rights at Work. When interpreting these policies, we follow ILO guidance materials and definitions.

Our Supplier Code of Conduct focuses on preventing situations that can put workers at risk of forced labor. They require that all work must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice. Suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of work. Suppliers must provide workers with documentation clearly stating the terms of employment in a language the worker can understand.

### **AUDITING**

Whole Foods Market evaluates suppliers of products manufactured on its behalf to determine the level of risk associated with slavery and human trafficking in their supply chains and requires those suppliers to represent that they and the producers of goods and materials used by them in products they sell to Whole Foods Market comply with Whole Foods Market's standards with respect to slavery and human trafficking. Further, Whole Foods Market engages third party auditors to perform announced audits 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 products manufactured on behalf of Whole Foods Market, and suppliers located in those countries where there is a high risk for slavery or human trafficking. High risk audits are performed by independent third-party auditors who specialize in social responsibility audits and workplace condition assessments.

## **CODE OF BUSINESS CONDUCT AND ETHICS**

Whole Foods Market is committed to ethical and socially responsible conduct in the workplace. In addition to following Whole Foods Market's [Supplier Code of Conduct](#), all employees and contractors must adhere to its [Code of Business Conduct](#), which requires compliance with all laws, including laws addressing slavery and human trafficking. Violations of the [Code of Business Conduct](#) by employees may result in disciplinary action up to discharge. Violations by contractors may result in their dismissal.

## **TRAINING**

Whole Foods Market has implemented a training program regarding its responsible sourcing guidelines, which underlines Whole Foods Market's standards regarding slavery and human trafficking. In addition, responsible sourcing training documentation is available to all Whole Foods Market employees who manage supplier relationships.

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 2021 by Whole Foods Market's Legal Team on behalf of Fresh & Wild Ltd.

Acknowledged and signed by:

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Damien Corcoran  
Director, Fresh & Wild  
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