

Juice Plus+

UK Modern Slavery and Human Trafficking Statement 2023

This Statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by The Juice Plus+ Company Ltd and other relevant group companies (Juice Plus+) which fall within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 for the financial year ending 30th April 2023 to prevent modern slavery and human trafficking in its business and supply chains.

Introduction

We know that slavery, servitude, forced labour and human trafficking (modern slavery) are issues of increasing global concern.

The COVID-19 crisis has created additional challenges - increasing the risk of modern slavery, poverty, restricted movement and exploitation of vulnerable groups worldwide.

Juice Plus+ has a zero-tolerance approach to any kind of human rights abuses, especially within our operations and supply chain. We are committed to respecting, protecting, and championing the human rights of all those who come into contact with our operations, including employees, stock and non-stock supply chain workers, customers and local communities. We accept our responsibility to support transparency and honesty; to find and resolve problems, and to work with others to protect the rights of workers, particularly those who are most vulnerable to abuses such as modern slavery. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

Throughout the last financial year, we contacted our key suppliers to monitor risks of modern slavery in our supply chain. We maintained our levels of trade to protect jobs in our supply chains as well as within our business. We continued to pay our suppliers on time and we did not impose any penalties for delayed deliveries.

We aim to continue with the same approach in 2023/2024.

Our business and supply chains

The Juice Plus+ Company Ltd is a Limited Liability Company (Ltd) registered in England with registered number 03222291.

The Juice Plus+ Company Ltd is a direct selling company, together with its direct subsidiaries and affiliates, that makes and distributes:

- branded nutritional and supplement products; and
- Tower Garden growing systems, accessories, nutrients and supplies - which harnesses aeroponic growing technology to facilitate growth of fresh healthy food in a clean, simple and efficient way.

Juice Plus+ and Tower Garden products are distributed through a network of local and independent distributors named "Partners". The direct subsidiaries and affiliates, together with The Juice Plus+ Ltd, are known as 'the Juice Plus+ global group'. Across the Juice Plus+ global group, we currently operate in the US, Austria, Finland, Germany, Italy, France, Benelux, Spain, Poland, Portugal, Switzerland, United Kingdom, Denmark, Norway and Sweden. For the purposes of the Modern Slavery Act 2015, only The Juice Plus+ Company Ltd meets the threshold requiring an annual statement to be produced.

Collaboration with DSA and SELDIA

Our business is supported by our own Code of Conduct, which applies to our Juice Plus+ global group and sets out our standards to Customers, Employees, Partners and Suppliers.

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Juice Plus+ is also part of recognised market associations like DSA (Direct Selling Association - <https://dsa.org.uk/>) and Seldia (www.seldia.eu), which endorse our leading collaborative efforts to combat forced labour.

The collaboration with these Associations is particularly important in lower tiers of supply chains where we do not have a direct commercial relationship.

Juice Plus+ uses a broad range of suppliers for our branded products. Suppliers provide services and support to our business operations.

Our approach to addressing modern slavery sits within our Agenda and we are keen to ensure that we have policies and procedures in place for our contractors, vendors, and suppliers.

Juice Plus+ is committed to making efforts to continuously improve its practices to avoid, and if identified - eliminate, any slavery risk in its business and supply chains.

We strongly believe in acting ethically and with integrity in all our business relationships.

Policies and contractual controls

Juice Plus+ has several policies, which aim to minimise the risk of modern slavery in our business and supply chain. These include:

- I. Employee Code of Conduct**
- II. Business Code of Conduct**
- III. Anti-Corruption Policy**
- IV. Whistleblowing Policies**
- V. Conflict of Interest Policy**

We firmly advocate for transparency and collaboration to eliminate risks of modern slavery and we will take any breach of our policies or allegations seriously.

Our Customers, Employees and Partners are provided with the right to raise individual concerns with our Compliance Team.

Performance against our policies and procedures is reviewed by our Corporate Compliance Department.

Due Diligence processes

We believe that our greatest risk exposure to Modern Slavery is in our product supply chains.

We have undertaken activity over previous years to minimise the risk of Modern Slavery by putting in place a due diligence process in line with Juice Plus+ standards and principles.

The process was developed by our Corporate Compliance Department in consultation with our internal Departments, suppliers and direct selling association bodies.

We support the procurement of goods and materials internally through our group company The Juice Plus+ Company Europe GmbH for our supply and for resale in our network. Our goods and materials are not acquired from suppliers in high risk countries.

Major suppliers in our product supply chain are asked to complete a questionnaire in which they:

- Inform us, when requested, of their Modern Slavery Act due diligence, which covers their governance, policies, training, and supply chain management processes; and
- Provide, when requested, full detail of their supply chains through which they are proposing to supply goods to Juice Plus+.

Should a supplier fail to provide the information requested or if the information provided does not meet Juice Plus+'s expectations, our Corporate Compliance Department will be informed so that appropriate action - which may include pressing for additional information, not entering into a relationship or terminating an existing relationship with the relevant supplier - can be considered and taken.

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We aim to reassess our policies and procedures regularly and respond to any potential and actual risks in our business and supply chains.

We work with highly respected recruitment agencies and service providers in our UK operations where resources are needed.

Since 2018, we have developed an internal recruitment team and operate a referral programme, which is defined in our Referral Policy. As part of our recruitment processes, we use reputable job boards for external advertising of vacancies, and we believe our controls over the process mitigate risks of modern slavery.

Next steps

Over the course of the next financial year, Juice Plus+ has decided, among other steps, to continue in its efforts towards:

- mapping, assessing, preventing, and mitigating potential risks of modern slavery or human trafficking in relation to new and existing supply chains;
- keeping and updating its mapping of all major suppliers in each operative country;
- conducting audits of the information received from suppliers to obtain a better insight into our supply chains and identify risks of any human rights abuses.

Approval of Statement

This Statement has been formally approved by the Board of Directors of The Juice Plus+ Company Limited and signed on their behalf.



Amanda Willis

Vice President, EMEA Finance and Legal and Director of The Juice Plus+ Company Ltd

December 2023

Contact us

If you have any comments or queries on our Modern Slavery and Human Trafficking Statement 2023, please contact:

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