



UK Modern Slavery and Human Trafficking
Statement 2020

This Statement has been published in accordance with the Modern Slavery Act 2015. It sets out all 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 2020 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 also increased the risk of forced labour and other human rights violations 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.

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, that distributes branded nutritional and supplement products through a network of local and independent distributors named "Partners". The direct subsidiaries, together with The Juice Plus+ Ltd, are known as 'the Juice Plus+ global group'.

Across the Juice Plus+ global group, we currently operate in Austria, Finland, Germany, Italy, France, Benelux, Spain, Poland, Portugal, Romania, Switzerland, United Kingdom, Denmark and Scandinavian countries. 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.

Juice Plus+ is part of recognised market associations likewise 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 direct commercial relationship.

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

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

In fact, Juice Plus+ is committed to continuously improving its practices to avoid, and in case identify and eliminate immediately, any slavery risk in its business and supply chains.

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

Policies and contractual controls

At the heart of our approach, we have important Standards, Procedures and Codes that make us fully committed to playing our part in eradicating modern slavery.

Juice Plus+ has several policies, which aim to minimise and, in any case, to avoid 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 Policy**
- V. **Conflict of Interest Policy**

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

We also provide the right to raise individual concerns. to our Customers, Employees, Partners and Suppliers.

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

Due Diligence processes

We fully understand that our biggest exposure to Modern Slavery is in our product supply chains, where we have undertaken activity over previous years to minimise the risk of Modern Slavery by putting in place a due diligence project in line with Juice Plus+ standards and principles.

The process was developed by our Corporate Compliance Department in consultation with all our internal Departments, including suppliers and direct selling association bodies. We also spoke to Competition Authorities to bring the voice of our people in the supply chain through our business management.

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.

All suppliers which we enter into business with shall:

- 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 they are proposing to supply goods to Juice Plus+.

Should a supplier fail to provide the information requested or to meet Juice Plus+'s expectations, our Corporate Compliance Department will take appropriate action, which may include not entering into a relationship or terminating any existing relationship with the relevant supplier.

Finally, we regularly reassess our policies and procedures and respond to any potential and actual risks in our business and supply chains.

Tackling modern slavery

a. Our business

As aforementioned, in our own operations, most of our people are employed on permanent contracts.

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

However, since 2018, we moved the recruiting operations internally through a referral programme, which is defined in the Referral Policy, and use of reputable job boards for external advertising of vacancies. We believe that identifying our new resources by a referral program and external advertising may mitigate high potential risks of modern slavery in light of evolving risk in the sector.

We have expanded the use of our internal Recruitment Team, and since 2018, we have an internal recruitment function.

We also work closely with UK Charities Entities, to improve the mitigation of modern slavery risks.

In addition, since 2018, we launched a project to assist on a temporary basis the refugee camp in Lesvos (Greece) thanks to the support

of our Employees and our Partners that help locally on a temporary basis.

We understand the importance of giving before receiving, and therefore we strongly believe that it will help to create a good working environment and ensure employees are able to raise any concerns.

b. Our supply chain

We assess the potential risks of our supply chains by considering the operative country local laws and where we are sourcing products or raw materials.

We use risk ratings to evaluate this, combined with our own understanding of rights and risks in our key sourcing Department.

At the next stage of our risk assessment, we considered the type of work being carried out (mechanical vs. manual) and the type of service.

Surveys indicate that there may be higher risks of slavery where there is a manual process, and that the risks can be compounded where work is seasonal rather than year-round since workers might not be legally registered in the country of work.

We keep working hard with our suppliers to obtain visibility of supply chains.

In addition to our own mapping efforts with our suppliers, we also use certification to provide additional visibility and assurance of our sourcing.

All our suppliers are either certified or audited locally. We informed our suppliers about our sourcing strategy to encourage overall improvement, as well as identify key partners, which may be at risk of modern slavery.

These are just some examples of how we work with multi stakeholder initiatives.

Awareness, impact, and monitoring

During this financial year, Juice Plus+ continued to provide advice and guidance to all our departments, especially to those who have direct responsibility for relevant supply chains.

Raising awareness of modern slavery both within our business and our supply chains has an important part of our training.

Moreover, improving labour standards in our supply chains is a responsibility we highlight to our suppliers.

We have developed Guidelines for our suppliers that detail how they can develop their own strategies to ensure human rights throughout their supply chain are respected.

We require all Juice Plus+ suppliers, including service providers such as labour agencies, to attend more training.

Next steps

Over the course of the next financial year, Juice Plus+ has decided, among other steps, to:


- Implement more internal checks to identify, map, assess, prevent, and mitigate potential risks of modern slavery or human trafficking in relation to new and existing supply chains;
- Complete a mapping project of all our suppliers in each operative country;
- Perform stricter ethical audits of all the information received by suppliers to obtain a better insight into our supply chains and identify whether any human rights abuses could have taken place;
- Run bespoke Modern Slavery training for Juice Plus+ internal departments as well as suppliers and service providers.
- Assess the effectiveness of the measures taken by Juice Plus+ by reviewing the following key performance indicators and reporting on them in future Modern Slavery Statements:
 - a) staff training levels;
 - b) actions taken to strengthen supply chain auditing and verification;
 - c) steps taken to up-skill our high-risk suppliers or service providers, and assessing their ability to detect and

mitigate modern slavery risk in supply chains; and

d) investigations undertaken into reports of Modern Slavery and remedial actions taken in response.

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.



Paul Anthony Jarvis
Chief Operative Officer and Director of The Juice Plus+ Company Ltd
December 2020

CONTACT US

If you have any comments or queries on our Modern Slavery and Human Trafficking Statement 2020, please contact:

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