



# MODERN SLAVERY STATEMENT

## 2018/2019

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## 1. Introduction

This statement constitutes The Juice Plus+ Company Ltd ("Juice Plus+") Modern Slavery Statement pursuant to the Modern Slavery Act 2015 for the financial year ended 31 March 2018 ("Statement").

This Statement covers the activities of Juice Plus+ and Juice Plus+'s supply chain.

## 2. Our business and supply chains

Juice Plus+ is a direct selling company, part of the global group Juice Plus+, that distributes its branded nutritional and supplement products through a network of local promoters ("*Franchise Partners*").

Our approach to addressing modern slavery sits within our Agenda.

In fact, our business is supported by our Code of Conduct, which applies to our global group and sets out our obligations to Customers, Employees, Franchise Partners and suppliers.

We have around 175 staff at our London and Maidenhead offices and over 10000 Franchise Partners based in the United Kingdom.

Our staff are largely permanent employees and are not in any category that is generally seen to be vulnerable to modern slavery in this country.

Our focus relates also in ensuring to have policies and procedures in place for our contractors and suppliers within the business.

Furthermore, Juice Plus+ is part of recognised market associations likewise DSA (Direct Selling Association - <https://dsa.org.uk/>) and Seldia ([www.seldia.eu](http://www.seldia.eu)), which endorsed our leading collaborative efforts.

The collaboration with these Associations also relies in lowering ties of supply chains where we do not have direct commercial relationship.

Juice Plus+ group uses a small range of suppliers for our branded products material/packaging, or services at events and any support to our business operations.

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.

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### 3. Policies In relation to modern slavery

At the heart of our approach, we have important standards, procedures and codes that make us fully committed to playing our part in eradicating any risk including modern slavery.

Juice Plus+ has a number of 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. Code of Conduct
- II. Anti-Corruption Policy
- III. Authority Policy
- IV. Conflict of Interest Policy
- V. Contracting Policy
- VI. Procurement Policy

We firmly advocate for transparency and collaboration to eliminate any risk of modern slavery. We take any breach of our policies or allegations extremely seriously. Furthermore, we provide with our Customers, Employees, Franchise Partners and suppliers with right to raise concerns.

Performance against our policies and procedures are reviewed by our Corporate Compliance Department chaired by Alexander Coelho, EMEA Director – Legal and Compliance, the business Directors and the Regional Compliance teams.

### 4. Due Diligence processes

Juice Plus+ always monitors the business and all suppliers. Over the past two years, we have put in place a due diligence process in line with our 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 speak with Competition Authorities in order to bring the voice of our people in the supply chain through our business decisions.

We trust that no modern slavery risks can be found in our business or supply chain.

In fact, we are supported in the supply of goods and materials internally through our affiliate entities The Juice Plus+ Company Europe GmbH and NSA Fleet LLC that resale the finished products within our network.

All suppliers which we enter in business with must:

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

Furthermore, during the past years, Juice Plus+ implemented even more internal checks to assess and map risks in our supply chains.

We performed an audit of all the information received by suppliers, giving us a better insight into the supply chains.

Our Corporate Compliance Department is responsible for assessing any information submitted by suppliers.

In fact, should a supplier fails 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.

We regularly reassess our policies and procedures and respond to any potential and actual risks in our business and supply chains. Our dedicated managers, not only based in the UK but in all our sourcing hubs in the EMEA region, lead this work, alongside with our Regulatory teams.

We have also launched a new audit policy focusing on risks in our supply chains named "Procurement Policy". For more detail, please contact the Corporate Compliance Department.

## 5. Tackling modern slavery

### a. Our business

Our commitment is embedded with the plan we have been doing over many years, and is about running the business in a way that makes a positive contribution to our employees, customers and Franchise Partners.

Our strategy, which covers the most serious labour challenges to workers, is one of the central plan's products pillars.

In particular, we have further increased our efforts and have particularly focused on:

- Strengthening our controls in the area of greatest risks
- Building a holistic approach
- Awareness-raising and capacity building of our internal teams and our suppliers



Across the Juice Plus+ global group, we have also businesses in Germany, Italy, France, Benelux, Spain, Denmark and Nordic countries.

We serve more than 50000 UK customers every month and at the heart of everything is our core purpose to serve our Customers in a better way every day.

We believe that our trade with people across the countries should have a positive impact, creating jobs and opportunities for people all over the world.

As said, in our own operations, the majority of our people are employed on permanent contracts.

We worked with top-notch recruiting agencies in our UK operations where resources are needed.

However, since last year, we moved the recruiting operations internally through a referral programme which is defined in our Referral Policy. We do believe that identifying our new resources through a referral program may mitigate high potential risks of modern slavery, also in light of the evolving risk in the sector.

We have expanded the use of our internal Recruitment Team, firstly implemented in 2016, and from next year, we will release a public platform for recruiting and job applications.

We have continued implementing an ethical auditing program also through our Procurement Policy. This allows our dedicated responsible teams to work closely with suppliers, including all service providers, and our internal People Team to help spot any potential indicators of high risk for the Company and for the group.

We continue to work closely with UK Charity entities, in order to improve the mitigation of modern slavery risks everywhere.

In fact, since 2018, we launched a project to help and assist on a temporary basis the refugee camp of Lesvos (Greece) thanks to the support of our Employees and Franchise Partners that will 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 workers are able to raise any concerns.

#### **b. Our supply chain**

We assess the potential risks of our supply chains in consideration of the local laws and where we are sourcing products, packaging or raw materials.

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

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

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Experience indicates 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.

In particular where they may not be legally registered in the country of work.

Our Managers across our operative countries are well aware about our supply chain and they had not identified any combined risk such as modern slavery.

We reviewed and updated our audit programme for supply chains, by way of conducting audits to identify whether any human rights abuses could had taken place.

We have focussed audit on high-risk locations also by recognised audit bodies supported by our dedicated Managers to address any non-compliances.

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.

We continue to participate in the Ethical initiative to mitigate the risk of exploitation through illegal recruitment practices, including indebtedness and coercion in the tinned tomato sector.

We have completed a mapping exercise of all our suppliers in each operative country.

All of our suppliers are either certified by or audited locally. We informed our supplier about our sourcing strategy to incentivise 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; you can find further examples by contacting our Corporate Compliance Department.

#### **6. Awareness, impact and monitoring**

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

Raising awareness of modern slavery both within our business and in our supply chains is an important part of our training. We know that identifying potential and actual cases requires understanding the drivers of modern slavery as well as the possible indicators.

Improving labour standards in our supply chains is a responsibility we highlight to our suppliers.

We require all Juice Plus+ suppliers, including service providers such as labour agencies, to attend more training. In addition to publishing this Modern Slavery Statement, we report annual progress on Corporate Compliance programme and to the Board of Directors.



This includes any critical breaches of our policies, the results of ethical audits, and progress against our sources.

We also monitor data pertaining to the training of our Employees, Franchise Partners and suppliers on modern slavery.

We receive quantitative feedback on all the training we deliver.

Over the course of the next financial year, we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

#### 7. Approval

This Modern Slavery Statement has been formally approved by the Board of the Directors of The Juice Plus+ Company Ltd and it is signed on their behalf.

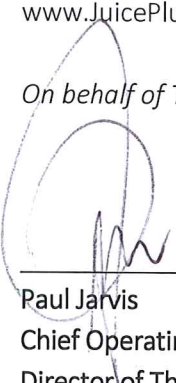
#### 8. Contacts

If you have any comments or queries on the Modern Slavery Statement, please contact our Corporate Compliance Department:

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*On behalf of The Juice Plus+ Company Ltd*



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