



our modern slavery statement 2024



1 January 2024 – 31st December 2024

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and covers the period between 1 January 2024 – 31 December 2024. It sets out the steps taken by Fresh Trading Limited and its group companies (as listed in its annual accounts), including innocent Limited and Fresh Trading Supply B.V. (together referred to as 'innocent').

about this statement

Here at innocent, we aim to make healthy, tasty juices and smoothies in a way that helps people live well through the delicious goodness of fruit and veg. We aim to responsibly source and manufacture our products in compliance with our global policies and principles stated in this report.

We have a human rights policy and supplier guiding principles, based on international standards, which prohibit any form of forced labour and include guidelines on matters like workplace health and safety and working hours. We put human rights standards into our supplier contracts. We visit our suppliers periodically to identify any risks of modern slavery, work collectively with our partners to set appropriate measures and provide human rights training to many of our employees.

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structure and supply chain

Over 800 people work at innocent. We're spread across offices in Amsterdam, Brussels, Copenhagen, Dublin, Madrid, Milan, Munich, Paris, Rotterdam, Salzburg, Stockholm, Vienna and our London headquarters. Our structure comprises core group functions (including finance, supply chain and marketing). These functions work closely with regional operations which focus on the different markets where our products are sold, ensuring that our responsible and commercial values are aligned across the company. At the end of 2024, we had a group revenue of just over €545 million.



We are a wholly owned subsidiary of The Coca-Cola Company (TCCC). Although we follow the same policies and practices as TCCC, innocent has a separate operating model, unique to the chilled juice sector. Fresh Trading Limited is the parent company of the innocent group and operates its supply chain through its Dutch subsidiaries, including a manufacturing site in the Netherlands, known as 'the Blender'.

We operate an end-to-end supply chain model, meaning we procure the raw ingredients and packaging that make our drinks, blend and bottle (partly at the Blender and partly outsourced to third-party suppliers), and then distribute to our customers (mainly retailers) who then sell to our drinkers. We globally source ingredients through third-party suppliers for our drinks. We do not operate or own any farms where the raw ingredients are sourced; these are owned and operated by our suppliers and/or their agents/sub-contractors. Other than the Blender, that can manufacture up to 60% of our production, we do not own, manage or control local bottling partners and factories. Our tier one direct suppliers are: direct ingredient, transport, warehousing, packaging and blending/bottling manufacturing suppliers (hereafter referred to as 'direct suppliers').

We use 112 ingredients from 40 countries based on our own bespoke specifications and requirements, and the bulk of our ingredients come from Spain, Brazil, Poland, Germany, Costa Rica and the Philippines. The ingredients are usually processed in the country where they have been picked. We work with 58 ingredient suppliers, of which we have a direct relationship with 43 (others are intermediary suppliers). The ingredients are blended in the Netherlands and Germany, with the drinks then bottled in the Netherlands, Germany, Spain, the Philippines and the UK. We purchase packaging from 13 countries, with the majority coming from the UK, Austria, France, Belgium, Germany, the Philippines and the Netherlands. Our 12 logistics partners move our drinks and raw materials around, and we sell our drinks in 14 different locations across 18 markets in western Europe.



our commitment and approach

1. our commitment to tackling modern slavery

innocent understands and takes seriously its responsibility to people in our business, our supply chain and the communities touched by our direct and indirect operations.

Our commitment is reflected by the expectations set out in our human rights policy and supplier guiding principles which refer to internationally recognised standards. innocent prohibits the use of all forms of forced labour and any form of human trafficking. Our policy is aligned to the UN guiding principles on business and human rights.

Our **human rights policy**, which lays out the standards we expect, is designed to make sure human rights are respected in our business and supply chain. We conduct due diligence and periodically carry out social audits on our supply chain (through a third party) to get transparency and assurance that suppliers are operating in accordance with our expectations.

All the factories where our products are blended and bottled by third-party suppliers must have a valid **Supplier Guiding Principles** (SGPs) audit or equivalent social audit from a benchmarked protocol. The SGPs align with our human rights policy and values. We continue to work closely with our factories to ensure everyone is on the way to meeting our requirements.

2. how we manage things

Our Human Rights Working Group (HRWG) is responsible for recommending and implementing our social strategy, monitoring progress of performance and risks, and addressing challenges we face. After being temporarily paused in 2023 due to team changes, it was re-established in 2024. The HRWG is a forum to discuss human rights within our organisation and supply chain in greater detail, and it allows us to bring human rights matters to the attention of our cross-functional Sustainability Steering Committee, which is sponsored by our Board of Directors. The implementation of the SGPs and human rights policy (which set out our expectations of our supplying partners on matters relating to human rights, monitoring and reporting) is then managed by our technical and responsible sourcing team. Because society is always changing, we need to keep updating the processes we use and it's the responsibility of the HRWG to make sure those processes stay relevant, advising the business accordingly.

3. how we assess things

We have several ways of assessing risks of modern slavery in our supply chain, including:

- a. A group-wide risk assessment. This assessment covers our direct suppliers and will be repeated at least every three years. This includes analysis of forced labour risks and other human rights issues.



- b. Risk assessments that happen both prior to partnering with new suppliers, and throughout our partnerships with our existing direct suppliers. This initial assessment includes modern slavery risk and draws on data and insights from external experts. Similarly, our sustainability risk assessment against major direct suppliers is completed annually and all high-risk supply chains are investigated. This covers modern slavery, child labour, labour practices, discrimination and bribery risks.
- c. Analysing the information presented in audit findings, visit reports and in responses to our Hero Supplier Programme (as defined below) questionnaire. We also regularly review external insights from NGO reports and media coverage, as well as learning from our peers through conferences and working groups which feed into our Human Rights Risk Tracker.
- d. Identifying (from our risk assessment) priority areas within our supply chain where modern slavery may be more prevalent, such as agriculture, transport, warehousing, manufacturing and service providers to third-party operated factories.
- e. Carrying out independent social compliance audits for our direct suppliers and intermediary ingredient processors in high-risk countries. As further investigation has revealed that risk can be based on location, seasonality and harvest method of each ingredient we buy, we ask our suppliers to share information through a template that helps us get a clearer view of the risks involved. Our teams are then provided with additional guidance on how to approach these visits.

4. how we react to things

1. We're committed to ensuring workers in our supply chain are respected. So we:

- a. Include our human rights policy, supplier guiding principles and business code of conduct in our supplier contracts and purchase orders, with a right to terminate if the suppliers fail to comply.
- b. Use independently verified sustainable sourcing standards for key raw materials (agricultural ingredients and wood-based packaging) regardless of direct or indirect supplier relationships.

2. We're aware that parts of our supply chain are considered to be a higher risk and we need to apply more diligence. So:

- a. We use an external consultancy to generate a 'higher-risk country' list, updated at least every three years.
- b. When sourcing regions are identified as 'higher risk', we either seek an alternative source or assign appropriate resources to address any systemic risks identified.
- c. When approving a supplier in a 'higher-risk country', it goes through additional governance processes (including sign off by our CEO).



3. We also recognise it's important that our employees have the appropriate resources and tools to identify human rights risks. So:

- a. New employees receive an introduction to human rights during their company induction.
- b. Those in our supply chain team (who interact more closely with suppliers) attend more detailed human rights training every two years, so that our due diligence tools are used consistently. At the end of 2024, 82% of these associates completed advanced courses on how to spot and tackle human rights issues with suppliers. In 2025, we are planning on rolling out additional training for those working in manufacturing at our Blender site.
- c. Employees, excluding Blender frontline workers, have a Force For Good role on their annual personal objectives. For some employees, this may involve contributing to our human rights due diligence.

4. We work with suppliers to combine our efforts in preventing modern slavery and stopping other adverse human rights impacts. We do this by:

- a. Sending our Hero Supplier Programme (HSP) to all direct suppliers. The HSP requires these suppliers to complete questionnaires about how they manage human rights on-site and in their supply chain processes (among other sustainability questions). We use the feedback we receive as a new benchmark to help inform our future human rights strategy and support these direct suppliers with more tailored guidance. This programme allows us to review performance and look for things we can improve in our supply chain. This year, 76.6% of direct suppliers completed the questionnaire.
- b. Monitoring direct supplier performance, including objectives related to human rights, using what we call supplier 'MyRoles' which are updated on an annual basis with our most significant suppliers.

5. We work on systemic issues in our supply chain, where we recognise that collaborations need to extend beyond our company-supplier relationships. So:

- a. We're members of a number of collaborative working groups which generate insights and take action on preventing modern slavery. These groups give us access to best practice guidelines and broaden our horizons to new approaches we could adopt, while also providing a forum where concerns or risks can be discussed. These working groups are: (i) Spanish Ethical Trade Association, (ii) Food Network for Ethical Trade (FNET), (iii) AIM-Progress, (iv) Sustainable Juice Platform (SJP).
- b. As members of the Spanish Ethical Trade Association (SETA), we've been actively involved in the development of APP Foros, a tool to support vulnerable workers in the agricultural sector in Spain. APP Foros aims to provide workers with a better understanding of their rights and obligations as well as the wider job market. To ensure it's as useful to as many people as possible, it will be available in three languages and has been made to suit different levels of literacy. We've also been developing a



grievance and complaints management mechanism (Canal Foros) that is available for workers and other stakeholders in four languages through three channels (Voice, WhatsApp & Web). Almost 10,000[^] workers are currently covered by this mechanism.

- c. Since 2019, we've partnered with the international civil society organisation Solidaridad and others (Cutrale, The Coca-Cola Company, The Coca-Cola Foundation and Eckes-Granini), to support smallholder orange farms in Brazil. The project provides training on sustainable agriculture practices with a focus on good labour management. In 2024, training materials were developed and shared with nearly 500 growers, with nearly 4,300 workers^{^^} benefitting from the scheme. Also, more than 2,300 people accessed online materials provided by the project.
- d. As members of Food Network for Ethical Trade (FNET), we actively participate in the FNET Climate Change & Human Rights Working Group, which focuses on increasing understanding and building capacity to tackle the joint impacts of human rights and climate change. This includes labour migration and vulnerable workforces. In this collaborative group, we share resources and learnings to enable better understanding of the impacts on working conditions in our supply chains, supporting practical action towards a more integrated human rights and environmental due diligence approach.

[^] The number of workers impacted is calculated by SETA by adding together the number of workers at the different sites where SETA have implemented Canal Foros. This includes visits to the farm and/or packhouse, training workers and fixing posters with the relevant information about Canal Foros.

^{^^} A total of 484 farmers were engaged and supported in 2024 by a team of Solidaridad field technicians who provided technical assistance through in-person visits, trainings and monitoring the practices implemented on the ground. These farmers collectively employed 4,285 workers. Finally, a total of 2,344 farmers accessed technical content. This figure was calculated by adding the number of downloads of materials available on the Citros Conecta platform (such as manuals, field notebooks, and farm management materials) to the average number of views of the technical videos Solidaridad produced and shared on YouTube and Instagram. All visits, farmers' information, and improved field practices were systematically monitored and registered using digital tools.

tracking our process

We have processes to track the effectiveness of our actions to address adverse human rights impacts. These involve:

- a. Documenting adverse impacts within our supply chain on our issue log, alongside assigning actions to named individuals with deadlines and review dates. By December 2024, actions were being taken for known issues related to human rights.
- b. Tracking the conformance of suppliers to our social compliance audit requirements. The suppliers audited are ingredient processing, direct packaging suppliers, bottlers, blenders, all European warehouses, outsourced packaging and intermediate ingredients processors in high or extremely high-risk countries. We support our suppliers to maintain best practices and adhere to our business code of conduct. Where non-compliances are found, we work closely with each of the sites so that we can get the issue remediated. For those without an in-date audit, we're ensuring they are on the audit plan for 2025.
- c. Conforming to international sustainability standards for indirect sourcing. Of our 112 ingredient supply chains, 99.2% of our ingredient volume was verified as meeting FSA bronze* or equivalent standard. For our packaging, 100% of on-shelf wood-derived packaging is FSC** certified.
- d. Circulating up-to-date human rights training to our employees. As a result, 82% of our priority employees in the supply chain team completed the human rights training programme.



thanks for reading

This statement has been approved by the innocent Board and we hope you've found it useful. Please pop an email to hello@innocentdrinks.co.uk if you have any thoughts or feedback for us.



Nick Canney

CEO, innocent drinks



*For farms growing our ingredients, we're using the Sustainable Agriculture Initiative (SAI) Platform's Farm Sustainability Assessment (FSA). The assessment is internationally recognised and covers both environmental and social standards, including the prohibition of any form of forced and bonded labour. The FSA is a practical tool for understanding what's happening on farms and encouraging continuous improvement. To reach the bronze performance level, independent auditors will check farms (or groups of farms managed in the same way) to verify the practices in place. If a farmer already has certification that's been approved by SAI as equivalent to FSA bronze or above, or holds a certification included in our sustainable policy for agricultural ingredients, then we accept this as an alternative.

**All our wood-derived packaging that you see on shelf has been sourced from Forest Stewardship Council™ (FSC™) certified forests. The certification protects workers' rights and prohibits all forms of forced or compulsory labour.

