



Modern Slavery Statement

This statement addresses the period from June 16, 2021 to June 15, 2022 in compliance with the requirements of the United Kingdom Modern Slavery Act and the California Transparency in Supply Chains Act. It also provides additional information on Whole Foods Market's human rights and labour programs.



INTRODUCTION

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 – whether slave, prison, indentured, bonded, or otherwise –and human trafficking from every aspect of its supply chain. Accordingly, Whole Foods Market expects suppliers to comply with the laws regarding slavery and human trafficking in the countries in which suppliers are doing business. Whole Foods Market engages with suppliers that are committed to Whole Foods Market’s same principles and standards, as stated in its [Supplier Code of Conduct](#) which is derived from the United Nations Guiding Principles on Business and Human Rights and the Core Conventions of the International Labour Organization (ILO), including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights.

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.

OUR POLICIES

Through our policies we communicate our values and expectations, setting a high bar for ourselves and our partners and making clear that we do not tolerate modern slavery. We are committed to consistently evolving and improving our approach. We regularly review our policies to identify areas for update and improvement. We conduct benchmarking against international standards and evolving industry norms to align with industry best practice.

Supplier Code of Conduct

Whole Foods Market’s [Supplier Code of Conduct](#) details 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 labour. We 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. Our Supply Chain Standards reflect domestic and foreign migrant workers' unique vulnerability to situations of modern slavery and make clear that workers may not be charged recruitment fees at any point in the recruitment process. We expect our Suppliers to analyze and monitor the practices of recruitment agencies and labor brokers and to employ agencies that act ethically and in the best interests of workers.

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.

RESPONSIBLE SOURCING OF WHOLE FOODS MARKET-BRANDED PRODUCTS

Our goal is for our products to be made in a way that respects human rights and the environment. Our [365 by Whole Foods Market brand](#) offers more than 3,500 affordably priced and thoughtfully sourced products that not only meet our already strict Quality Standards, but also in many cases go above and beyond what we require of other brands when it comes to sourcing and supply chain transparency. Amazon has a similar line in their report (pg. 5): Our Responsible Sourcing Program works to reduce risks and ensure the rights of workers, especially those considered to be in a vulnerable population or who work in countries associated with a higher modern slavery risk.

At Whole Foods Market, all 365 by Whole Foods Market brand chocolate bars, chocolate chips, and baking chocolate are certified by Fair Trade USA. In 2021, we transitioned all 365 by Whole Foods Market tea to be certified by either Fair Trade USA or Rainforest Alliance.

In addition, all 365 by Whole Foods Market packaged coffee is responsibly sourced and certified according to an approved third-party certification, including Rainforest Alliance, Fair Trade USA, or Fairtrade



International. Whole Foods Market is also a member of Conservation International's Sustainable Coffee Challenge, a collaborative effort of companies, governments, NGOs, research institutions, and others to transition the coffee sector to be more sustainable.

Finally, we are concerned with the social and environmental impacts of palm oil production in tropical rainforest ecosystems around the world. To show our support for the protection of rainforests, communities, and our global climate, we are proud to report that 100% of 365 by Whole Foods Market brand food items containing palm oil, palm kernel oil, palm fruit oil and palm shortening are produced using sustainable oil products.

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 our supply chains. We require our suppliers, as well as the producers of goods and materials used by them in products they sell to Whole Foods Market, to comply with our 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.

Conflict Minerals

Whole Foods Market is committed to avoiding the use of minerals that have fueled conflict in the Democratic Republic of the Congo and its adjoining countries. Such minerals include tin, tantalum, tungsten, and gold. We expect our suppliers to support our efforts to identify the origin of designated minerals used in our products we manufacture or contract to manufacture. We survey our buyers and suppliers regularly to determine whether such products contain conflict minerals, or if the functionality or production of such products require conflict minerals. The Whole Foods Market [Supplier Code of Conduct](#) sets forth our expectations that all of our suppliers participate in such diligence.

SOURCED FOR GOOD PROGRAM

Our [Sourced for Good](#) program focuses on providing benefits for workers, their communities, and the environment where our products are sourced.

We collaborate with farms, producers, and international third-party certifiers to ensure that participating suppliers have full supply chain visibility and demonstrate measurable, positive impacts, such as improved wages, access to healthcare for workers and their families, enhanced educational opportunities, and environmental conservation efforts.



All Sourced for Good products are third-party certified to ensure added value to workers, communities, and environment. Our third-party certification partners include:

- [Fair Trade USA](#)
- [Rainforest Alliance](#)
- [Fair Trade America](#)
- [Fair Food Program](#)
- [Equitable Food Initiative](#)

Millions of dollars are raised annually for hundreds of communities across 12 countries, even in the U.S., and customers can find the Sourced for Good seal on more than 100 products in stores, including on bananas, asparagus, peppers, tomatoes, and tulips.

We are also proud to say that we have expanded the program to domestic and seafood suppliers as well, as we strive to serve more communities. We have plans to expand the program into additional commodities and/or departments in the future.

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 2022 by Whole Foods Market's Legal and Quality Standards Team on behalf of Fresh & Wild Ltd.

Acknowledged and signed by:

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Damien Corcoran
Director, Fresh & Wild Ltd.