

our modern slavery statement 2022

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1 January 2022 - 31 December 2022

This statement has been written in accordance with the requirements of the UK Modern Slavery Act 2015 and shows the progress we have made during the financial year. Published July 2023.

this statement in a nutshell

Here at innocent, we aim to make healthy, tasty juices and smoothies in a way that helps people and the planet.

We've created our own human rights policy based on international standards, which prohibits any form of forced labour and includes guidelines on things like workplace health and working hours. Since launching our policy, we've put human rights standards into our supplier contracts and put programmes in place to make sure we recognise where else we could do more. We do our research and visit our supply chain related suppliers periodically to check for any risks of modern slavery and we make sure that many of our employees are engaged on human rights too. This approach takes a bit more time and can be costly, but it's important that we leave no stone unturned.

Read on to hear more about our mission to show that doing business the right way actually works.

what's in this statement

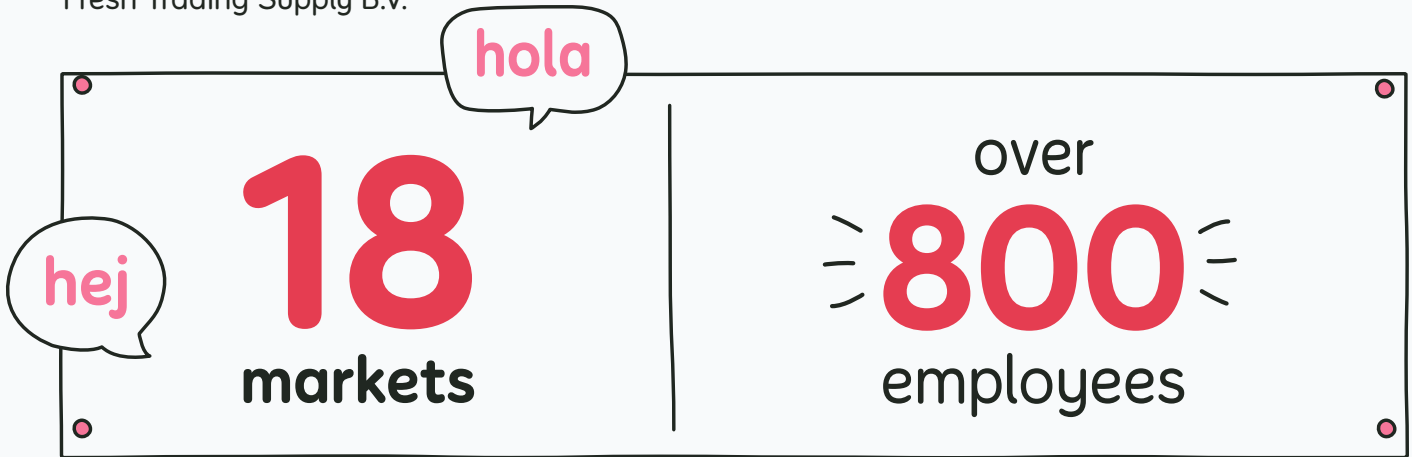
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hello

Back in 1999, innocent was founded by three friends who met at university. Ever since then we've been on a quest to make natural, delicious and healthy drinks that help people and planet live well.

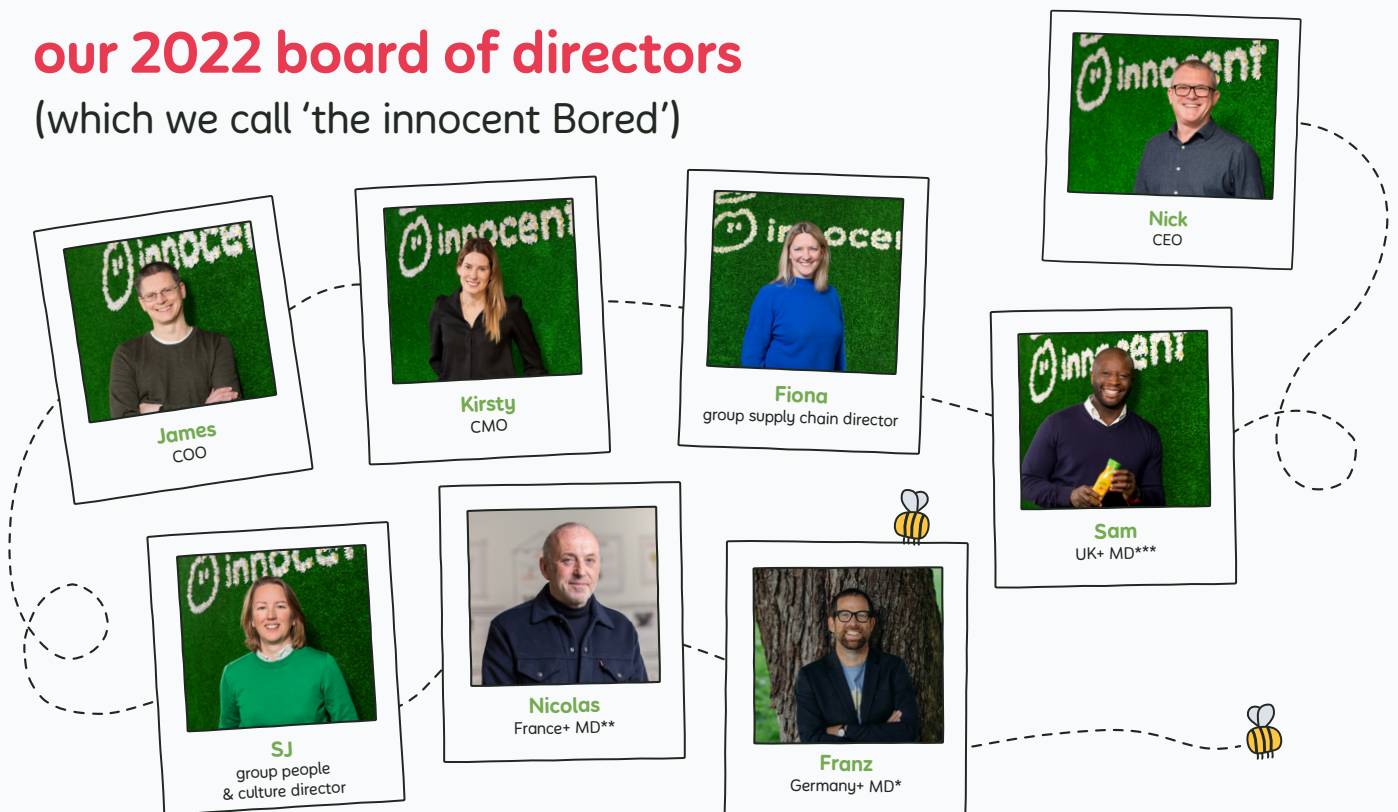
We've come a long way since we started out selling smoothies at a music festival and right from the beginning, we've focused on leaving things better than we found them. These days, we're one of the leading brands in the chilled juice sector in Europe, with our little drinks sold across the continent. This statement sets out the steps taken by Fresh Trading Limited and its group companies (as listed in its annual accounts) including in particular, innocent Limited and Fresh Trading Supply B.V.



Just over 800 people work at innocent. We're spread across offices in Amsterdam, Rotterdam, Copenhagen, Dublin, Madrid, Milan, Munich, Paris, Salzburg, Stockholm, Vienna and our London headquarters (Fruit Towers). Our structure comprises of core group functions (like finance and sustainability) who work closely with regional functions (like sales and marketing) which focus on the different markets where we sell our stuff. At the end of 2022, we had a group revenue of just under £426.1 million.

our 2022 board of directors

(which we call 'the innocent Bored')



*Germany+: Germany, Austria, Switzerland and the Nordics

**France+: France, Benelux, Italy, Spain and Portugal

***UK+: UK & Ireland



What's just as important as selling our drinks, is how we go about making them. We have company values and one of them is to be responsible. That means we expect everyone working at innocent, as well as everyone in our supply chain, to think carefully about how they do business on our behalf. Over time, we realised that we could use our values to show the world that it's possible to build a successful business that cares about more than profit. That's why, in 2018 we became [B Corp Certified](#). By becoming a B Corp, we've joined a global movement of companies that believe in using business as a force for good and are committed to keep improving our alignment to this purpose (in 2021 we re-certified as a B Corp, increasing our score to 105.2 points).



We won't stand for any form of modern slavery or human trafficking being part of how we make our drinks. While we've seen no evidence of slavery in our supply chains, we recognise that this is a widespread and well-hidden issue. As such, we're working hard to reduce the risk of it being part of our supply chain. Each year, we put together this annual statement to show what we've been doing and what we've learnt.

our structure and supply chain

The most significant area we use suppliers for is to source our ingredients and help us make our drinks. In 2022 we had a partially outsourced supply chain, so we don't own the farms that grow our ingredients or the factories that make our packaging. We're in the process of changing where our drinks are blended and bottled, and in 2021 we opened our own factory (the Blender) to do just that. The Blender was still ramping up in 2022 so the majority of our drinks continued to be bottled in factories owned by our suppliers. As the proportion of our drinks that are blended and bottled in our own factory increases, this will give us more control over how our workers are recruited, managed, respected and supported.



what we did in 2022

- We updated our business-wide sustainability risk assessment, which included analysis of forced labour and other human rights issues. This assessment covers all our supply chain partners, as it did in 2021. It will be updated again in 2023.
- We relaunched our advanced human rights training to include the latest risks and best practice. All our staff had access to training on our approach to human rights and 69% of our priority teams have completed advanced courses. Priority teams consist of members of the supply chain team who are more likely to be exposed to incidents of Modern Slavery
- In March 2022, the UK Insolvency Service started formal criminal and civil investigations into the redundancies made by one of our suppliers. The logistics division of DP World is a freight & logistics supplier to innocent. To make sure workers within our supply chain were being treated fairly, we wrote to DP World and set up a third-party inspection. No similar issues were found and we received full co-operation with our requirements and recommendations.
- Following the invasion of Ukraine, over five million refugees settled in Poland, a key sourcing region for innocent. We joined a working group organised by the Ethical Trade Initiative to align with other businesses and co-ordinate our response. Building on the lessons learned from the experiences of Syrian refugees working in Turkey's garment industry, the working group developed practical guidelines to help suppliers support the integration and employment of displaced people. innocent sent these guidelines to relevant suppliers along with a questionnaire to add depth to our due diligence in affected supply chains. We also partnered with one of our Polish suppliers to promote the an app to Ukrainian workers. The app provides multilingual advice on what to expect in Poland. It offers information about working hours, wages and other benefits as well as details on things like school places and charities in the area.
- In 2019, we partnered with the international civil society organisation Solidaridad, The Coca Cola Company, the Coca-Cola Foundation and other companies' to support nearly 500 smallholder orange farms in Brazil. The project provides training on sustainable agriculture practices and has a focus on good labour management. In 2022, training materials were developed and shared with around 200 growers, with nearly 1,000 workers benefitting from the scheme. The project aims to train nearly 500 farmers by 2024, in the hope that 240 of those will reach an international sustainability standard.
- In 2019, we switched our coconut water sourcing from a higher-risk supply chain to Fair Trade certified farmers in the Philippines. In 2022, we invested \$300,000 into Fair Trade premiums. That money is paid to farmers and workers on top of the price they get for their produce and it goes towards social programmes (including education, healthcare and business development) that benefit the whole community.
- We've been working with the NGO Emerging Leaders to invest in farming communities since 2019. In 2022, 256 farmers received finance and leadership training. The programme has helped growers increase their incomes, take on good employment practices and become more involved in community development. This training was offered to:
 - 41 guava farmers in India
 - 93 passion fruit farmers in Ecuador
 - 27 strawberry supervisors and pickers in Spain
 - 95 mango farmers in Colombia



1. our commitment to tackling modern slavery

innocent understands and takes seriously its responsibility to all people in our business, our supply chain and the communities touched by our direct and indirect operations. For us, getting to grips with modern slavery and people trafficking is part of a wider focus on protection and advancing human rights.

Our commitment is reflected by the expectations set out in our [human rights policy](#) which refers to internally recognised standards and is approved by members of our board. innocent prohibits the use of all forms of forced labour and any form of human trafficking.

The processes we use are aligned to the UN guiding principles on business and human rights and are summarised below.



2. how we manage things

Our Human Rights Working Group (HRWG) is responsible for how innocent manages human rights in its supply chain. Society is dynamic and this means we need to keep updating the processes we use – it's the responsibility of our HRWG to keep our processes up to date and appropriate to the human rights impacts of our business.

1. The HRWG signs off the strategy and agrees action plans to implement the strategy.
2. The HRWG has accountability for actions delivered directly or by their teams, and reports progress to the business forum responsible for compliance (we call them the allrounders).
3. The HRWG works as ambassadors for human rights, ensuring it's on people's MyRoles (our internal objectives list) within relevant teams. Everyone at innocent has a Force For Good objective as part of their role, which may include objectives aligned to our due diligence on preventing modern slavery.
4. Any issues identified are escalated to the HRWG, who will decide the appropriate next steps.

teamwork makes the dream(s) work

A lot like our vision, we reckon we can have the biggest impact if everyone who works here helps contribute to us being a force for good. We came up with four roles and everyone adds one of them to their objectives for the year, along with nailing the tea round and remembering their laptop password.

1

agitator

Look for ways to be a more responsible business.



2

ambassador

Share our force for good work with others.



3

activator

Deliver a specific bit of force for good work.

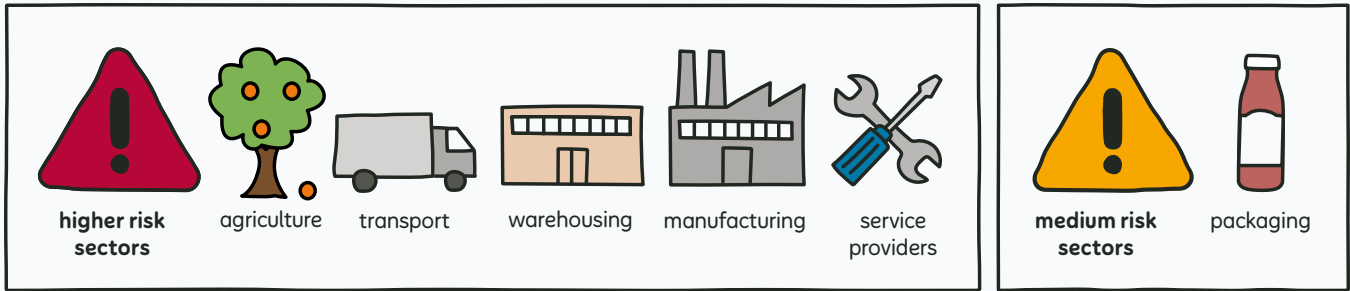


4

protector

Guard our approach to being a responsible business.





3. how we assess things

We have a number of tools to help us identify risks of modern slavery in our supply chains, including:

1. A group-wide risk assessment. This assessment covers all suppliers and will be repeated at least every three years.
2. Risk-assessment before working with new ingredient, transport, warehousing, packaging or manufacturing suppliers. Our assessment includes modern slavery risk, and draws on data and insights from external experts.
3. Analysing the information presented in audit findings, visit reports and in responses to our Hero Supplier Programme questionnaire. We also reflect on external insights from NGO reports, media coverage and learn from our peers through conferences and working groups.

From our risk assessments we've learnt that agriculture, transport, warehousing, manufacturing and service providers to our factory are higher-risk sectors for modern slavery. The packaging supply sector is medium risk, but will be explored further alongside the higher-risk sectors. We've known since our 2017 assessment that the agricultural sector tends to be the highest risk, with Brazil, India, Spain and the Philippines being the highest risk countries.

Further investigation has revealed that the location, seasonality and harvest method of each ingredient we buy has a big impact on how likely it is that human rights violations will take place. So, we've developed prompts for our teams to use on visits, and templates to guide our suppliers to share information that'll help us understand the risks of modern slavery more clearly.

4. how we react to things

1. **A primary defence against modern slavery (and other human rights issues) is to make sure local labour laws and international labour standards are upheld. Contracts and auditing aren't going to instantly stop human rights abuses, but they show we're serious about human rights, and committed to protecting workers in our supply chain. So we:**
 - a. Include our human rights policy and business code of conduct in our supplier contracts.
 - b. Carry out independent, social compliance audits for direct suppliers and intermediary ingredient processors in high-risk countries.*
 - c. Use independently verified sustainable sourcing standards for key raw materials (agricultural ingredients and wood-based packaging) regardless of direct or indirect supplier relationships.*

*You can read more about this in the section below on tracking our performance.



2. **Sometimes there's a significant difference between international labour standards and local labour laws or common practice. As a result, we may not be able to influence suppliers in those regions to operate according to the higher standards our business expects. So:**
 - a. We use an external consultancy to generate a 'blocked country list', updated at least every three years.
 - b. These sourcing regions are not banned, but prompt the business to reflect properly on the risks identified. Then we either seek an alternative source, or proceed while assigning appropriate resources to address any systemic risks identified.
 - c. Approving a supplier in a 'blocked country' must be signed off by a board member.

3. **Another way we prevent modern slavery is to make sure the employees of innocent are informed, motivated and equipped to champion human rights in their work, and with the suppliers they engage with.**
 - a. All new employees receive an introduction to human rights during their company induction.
 - b. In addition, technical and procurement managers that work with our suppliers attend more detailed human rights training so that our due diligence tools are used consistently. We're a passionate bunch at innocent, so people from other teams often join this training voluntarily.
 - c. All employees have a Force For Good role on their annual personal objectives which for some employees may involve contributing to our human rights due diligence.

4. **We've committed to work with our suppliers to combine our efforts in preventing modern slavery and stopping other adverse human rights impacts. We do this by:**
 - a. Sharing insights and resources including best practice guidelines. For example, we fund [Stronger Together](#), an initiative aiming to reduce modern slavery by providing guidance, training and a network for businesses to work together to reduce exploitation. Through our membership, our suppliers are able to benefit from training sessions run by Stronger Together.
 - b. Using our Hero Supplier Programme to gain insights into how our suppliers manage human rights on-site and in their supply chains. This programme allows us to review performance with suppliers and identify opportunities for improvement.*
 - c. Monitoring 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've committed to work on issues in our supply chain, where we recognise that collaborations need to extend beyond our discrete company-supplier relationships. So:**
 - a. We're members of a number of collaborative working groups which generate insights on preventing modern slavery. The groups give us access to best practice guidelines, and broaden our horizons to new approaches we could adopt. In addition to the Stronger Together network mentioned above, we're also members of:
 - i. [Spanish Ethical Trade Forum](#)
 - ii. [Food Network for Ethical Trade](#)
 - iii. [AIM-Progress](#)

*You can read more about this in the section below on tracking our performance.

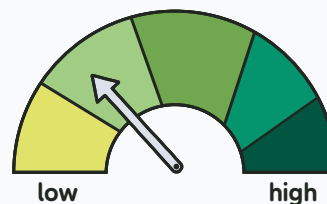


6. We have a process to help stop any adverse human rights impacts to which we contribute directly or indirectly. This process can be summarised as:

- Identify the issue.
- Escalate the issue to HRWG and record it on our issue log.
- HRWG and other internal stakeholders explore the issue, before assigning responsibilities, budgets and deadlines.
- Update the issue log with an action plan.
- Progress is recorded on the issue log*, which is reviewed by the HRWG each quarter.

5. how we track things

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



- As described above, we document adverse impacts within our supply chain on our issue log, alongside assigning actions to named individuals with deadlines and review dates. By December 2022, actions were being taken for all known issues related to human rights. You can read about what we've been working on in the [2022 summary section](#) above.
- We track the status of suppliers conforming to our social compliance audit requirements.

metric	2017	2018	2019	2020	2021	2022
suppliers in scope	95	107	137	142	150	128
% audited	97	85	75	86	73	77
% compliant					71.3 (new metric)	75
breakdown of non-compliant (NC) suppliers					<ul style="list-style-type: none"> Outstanding audit NC – 2.1% (see appendix 1a) No audit – 13.3%^ (appendix 1b) Audit is over 3 years old – 13.3%^ (appendix 1c) COVID restrictions made auditing challenging in 2021 	<ul style="list-style-type: none"> Outstanding audit NC – 2% (see appendix 1a) No audit – 6% (see appendix 1b) Audit is over 3 years old – 17% (see appendix 1c)
types of suppliers we audit	ingredient processing, direct packaging suppliers, bottlers, blenders and our main UK warehouse	ingredient processing, direct packaging suppliers, bottlers, blenders and all European warehouses	ingredient processing, direct packaging suppliers, bottlers, blenders, all European warehouses and outsourced packaging	ingredients processing, direct packaging suppliers, bottlers, blenders, all European warehouses, outsourced packaging and intermediate ingredients processors in high or extremely high risk countries		

- Progress and performance levels of prioritised suppliers within our Hero Supplier Programme are communicated to our supply department each quarter, by the consultancy that runs this process. In 2022, we took the opportunity to review our Hero Supplier Programme. We updated the questionnaire and supplier guidance to make sure they stay relevant. For this reason, we haven't reported on this in 2022 but will report in 2023 with an updated set of metrics as a new long-term benchmark.

*You can read more about this in the section below on tracking our performance.



4. The training status of people working in our supply team is tracked annually by the HRWG.

metric	2018	2019	2020	2021	2022
% of people from our people and supply teams trained on human rights, including modern slavery	94	68	93	76	69

5. Conformance to international sustainability standards for indirect sourcing.

metric	2018	2019	2020	2021	2022
number of ingredient supply chains (each different ingredient-supplier-country combination)	90	106	114	107	119
ingredient volume % verified as meeting FSA bronze [^] or equivalent standard	8	55	75	89	93
% of on-shelf wood-derived packaging that's FSC ^{\$} certified	new disclosure			100	100

The absolute numbers of supply chains may differ to the percentages shown, as we will buy very different volumes from each supplier, and percentages are based upon volumes purchased annually, which will fluctuate year-on-year.

[^]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. We use it in a way that builds relationships, structure and transparency into supply chains. 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, then we accept this and give farmers time back to carry on with all the good stuff they do.

^{\$}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.

6. a commitment to transparency

In addition to this modern slavery statement, we use other ways to show how we address our human rights impacts.

1. Each year, we publish a group [Good All Round](#) report, which includes actions we've taken on human rights, while being mindful of confidentiality and safeguarding concerns. Our annual impact report is available, along with [past copies](#), on our website.



2. Every three years we complete the BIA self-assessment and are audited by B-Lab in order to maintain our B Corp status. This assessment includes questions on how we manage human rights within our supply chains and our own business. In 2021 we improved our score from 92.5 to 105.2.

looking ahead

In 2023, we're focusing on increasing the coverage of our social compliance audit programme and relaunching our Hero Supplier Programme, extending coverage to all direct suppliers of blending & bottling services, warehousing & logistics, ingredients and packaging. To support this, we'll also be issuing a new supplier guidebook to remind everyone of what we expect and inspire our suppliers to go further by sharing examples of best practice.

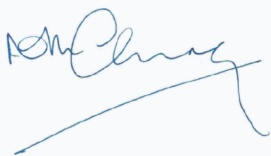
We'll use the feedback we receive from our supplier sustainability questionnaire to support our suppliers with training and we'll continue to share resources and any good work we come across (just as we'll continue to give priority teams at innocent what they need to stay on top of things).

In addition to these activities, we'll run the projects you've read about, respond to any issues that arise and participate in industry working groups so we can learn from, and contribute towards, progress in the wider food industry.

thanks for reading

This statement has been approved by our human rights working group and the innocent board and we hope you've found it useful. If you have any thoughts or feedback for us, please get in touch by popping an email to hello@innocentdrinks.co.uk.

Whilst modern slavery is a tough issue to tackle, it's really important that we do. We look forward to another busy year working hard to make sure it isn't happening in our business or supply chains.



Nick Canney

CEO (aka chief squeezer)
innocent



appendix

75% conformance to our social compliance audit requirement is far lower than we'd like. In 2022, the focus was getting back on track by tackling the audit backlog caused by COVID-19 travel restrictions in 2020 and 2021. We're working with our independent auditors to co-ordinate their plans to visit our suppliers around the world as soon as possible.

a. Suppliers with non-conformances on an existing social audit

- i. Packaging supplier in France - no issues related to modern slavery.
- ii. Intermediary ingredient processor in India – no evidence of forced labour was observed but this site was paying slightly below minimum wage which will be paid retrospectively.

b. Suppliers without a social compliance audit*

- i. Packaging supplier in the Philippines
- ii. Packaging supplier in the Netherlands
- iii. Packaging supplier in France
- iv. Packaging supplier in France
- v. Packaging supplier in France
- vi. Ingredient supplier in Germany
- vii. Ingredient supplier in the United Kingdom
- viii. Ingredient supplier in Madagascar

c. Suppliers with expired social compliance audits (audits are over three years old)*

- i. Ingredient supplier in Nicaragua
- ii. Ingredient supplier in Ecuador
- iii. Ingredient supplier in Costa Rica
- iv. Ingredient supplier in Vietnam
- v. Ingredient supplier in Honduras
- vi. Ingredient supplier in India
- vii. Ingredient supplier in the United States
- viii. Ingredient supplier in the Netherlands
- ix. Packaging supplier in the United Kingdom
- x. Packaging supplier in Belgium
- xi. Packaging supplier in France
- xii. Packaging supplier in France
- xiii. Packaging supplier in Netherlands
- xiv. Packaging supplier in Spain
- xv. Logistics supplier in Denmark
- xvi. Logistics supplier in Sweden
- xvii. Logistics supplier in Germany
- xviii. Logistics supplier in Germany
- xix. Logistics supplier in Austria
- xx. Logistics supplier in the Netherlands
- xxi. Bottler in France

*Two audits were booked before the end of the year.

