

Vitaflo (International) Limited (**Vitaflo**): Statement under section 54 of the Modern Slavery Act (2015) for the financial year ending 31 December 2024.

## **Introduction from Vitaflo's senior management team**

Vitaflo is committed to transparency in all its supply chains and, together with its parent company Nestlé UK Limited and the wider Nestlé group, is fully committed to mitigating the risk of slavery and human trafficking in all of its operations. This statement (covering the 2024 calendar/financial year and effective from 11 March 2024) provides an update on the progress made by Vitaflo since the publication of our previous statement.

## **Organisation's structure and supply chains**

Vitaflo is a UK-headquartered company which manufactures specialist clinical nutrition products and distributes them globally. It is wholly owned by Nestlé UK Limited, which is itself ultimately owned by Nestlé S. A., a Swiss company. As such, Vitaflo forms part of the global Nestlé group and is part of that group's Nestlé Health Science division.

Over 350 people work within the Vitaflo business worldwide, including those employed by Vitaflo itself, those who work in Vitaflo subsidiaries and in local Nestlé/Nestlé Health Science entities in various markets. Vitaflo also works closely with a global network of distributors and wholesalers.

All of Vitaflo's clinical nutrition products (including the recently-acquired Mevalia and Comida) are manufactured to the highest standards. In addition to Vitaflo's UK manufacturing facility, and the facility acquired in Germany in 2021, we work with a number of raw materials suppliers and co-manufacturers in various countries across the world. Our raw materials include highly specialised amino acid and vitamin pre-mixes which are manufactured to our own manufacturing standards and specifications. Wherever possible, we use Nestlé-approved raw materials suppliers which have been rigorously assessed for compliance with the Nestlé policies and principles outlined below. This also ensures that we meet our responsibilities to patients using our products, and demonstrates Vitaflo's commitment to sustainable and ethical sourcing.

Vitaflo's supply chains are, for the most part, separate from and independent of those of Nestlé. This statement applies specifically to the Vitaflo business and describes the steps taken to mitigate any human rights risks in our supply chain. No area of our supply chain is believed to be at particular risk of either modern slavery or human trafficking.

## **Policies in relation to slavery and human trafficking**

All businesses in the Nestlé group, including Vitaflo, must comply with the Corporate Business Principles, which (amongst other things) set out Nestlé's zero tolerance approach towards any violations of human rights in its operations and value chain, and specifically to child labor, forced labor and modern slavery. Vitaflo also adheres to and fully endorses the principles set out in Nestlé Responsible Sourcing Core Requirements (**NRSCR**), launched in 2024 and which address (amongst other things) human rights and business integrity. A copy of the NRSCR may be accessed at: [nestle-responsible-sourcing-standard-english.pdf](#). The Corporate Business Principles may be accessed at [corporate-business-principles-en.pdf \(nestle.com\)](#).

In common with its parent company, Vitaflo's aim is to ensure that the NRSCR are systematically put into effect throughout our supply chain and constitute an integral part of our contracts with our suppliers. Vitaflo is in the process of incorporating the NRSCR into its contracts with suppliers and co-manufacturers to ensure that they form a core part of the



business relationship, and that they also bind the co-manufacturer or supplier's agents, subcontractors and employees. It is also the responsibility of Vitaflo's suppliers and co-manufacturers to ensure that the NRSCR are cascaded down to the next tier of the supply chain (if any), such as a supplier of raw material to a co-manufacturer.

The NRSCR sets out extensive minimum requirements of Vitaflo's direct suppliers in the sphere of human rights and mandate the following in the context of modern slavery and human trafficking:

- Workers are treated equally, with respect and dignity.
- No worker is subject to any form of psychological, physical, sexual or verbal abuse, intimidation, or harassment.
- Work is conducted on a voluntary basis.
- Under no circumstance is forced labor used. This includes trafficked labor, prison labor, bonded labor or other forms of forced labor.
- The minimum age of employment is respected, and young workers are protected.
- Workers are provided with a healthy and safe workplace environment.
- Working hours are legal and decent.

Adherence to the NRSCR is measured using various methods depending on the level of risk, including self-declaration, desk-based assessments and site audits or assessments. Any non-compliance is addressed by a time-bound action plan agreed with Nestlé, or alternatively, Nestlé may decide to suspend or terminate its relationship with the partner.

### **Processes to detect and avoid slavery and human trafficking**

To date, Vitaflo has not identified any practice in its supply chain that indicates that modern slavery or human trafficking has occurred in any part of the business. Vitaflo continues to be vigilant when identifying or taking on a new supplier or collaborating with a co-manufacturer or other partner, and the due diligence steps taken include:

- Identify and assess potential risk areas in our supply chains.
- Ensure that the partner adheres to NRSCR.
- Acquire raw materials from approved Nestlé suppliers where possible.
- Agree and implement a regular audit programme.
- Protect whistle blowers and uphold Vitaflo's policy to protect employees wishing to disclose information about illegal or unethical practices.

Vitaflo has an established compliance committee chaired by the General Counsel which meets quarterly and reports any noncompliance with laws, regulations or the Nestlé standards and codes to Vitaflo's leadership. Employees are positively encouraged to come forward with any concerns via an anonymous "speak-up" facility.

Vitaflo regularly evaluates the performance of its co-manufacturers, suppliers and other partners by auditing them regularly (either through our own Quality team or via the Nestlé audit process). Our dedicated supply chain team works regularly with Vitaflo's legal, procurement and compliance teams to ensure there is alignment with the Nestlé policies including the NRSCR.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we provide training on the Code and on responsible sourcing to those employees involved in the supply chain.



The above steps underline Vitaflo's core values to act fairly, be open and honest, and to ensure transparency in our supply chain and in all our dealings.

### **Our effectiveness in combating slavery and human trafficking**

For another year, our extensive diligence has not uncovered any practice in Vitaflo's supply chain that indicates that modern slavery or human trafficking has occurred in any part of our business. However, the business is not complacent about the risks that may arise in future, particularly as the Vitaflo business expands its global reach and enters emerging markets. We will maintain our vigilance and adherence to the NRSCR and continue to ensure that all suppliers and collaborators adhere to these high standards.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Vitaflo's slavery and human trafficking statement for the financial year ending 31 December 2023. It was approved by the leadership team on 11 March 2024.



Caroline Charlesworth, on behalf of Vitaflo (International) Limited

