

Vitaflo (International) Limited (Vitaflo): Statement under section 54 of the Modern Slavery Act (2015)

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 2022 calendar/financial year and effective from 30 April 2022) provides an update on the progress made by Vitaflo since the publication of our previous statement in April 2022.

Organisation's structure

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. Vitaflo adheres to and fully endorses the principles set out in Nestlé Responsible Sourcing Standard and the Nestlé Supplier Code (Code), which address (amongst other things) environmental rights, plastic packaging, responsible recruitment/employment and equal remuneration as well as forced labour and minimum employment age. Copies of the Standard may be found here: <https://www.nestle.com/sites/default/files/asset-library/documents/library/documents/suppliers/nestle-responsible-sourcing-standard-english.pdf>.

However, 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.

Our business

Almost 300 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. We also work closely with a global network of distributors and wholesalers. To find out more about the nature of Vitaflo's business, please see: <https://www.nestlehealthscience.co.uk/vitaflo>.

During 2021, Vitaflo acquired the metabolic business of Dr Schär and now owns the Mevalia and Comida brands worldwide. So far, Vitaflo has acquired three new co-manufacturers and this number will likely increase further. Vitaflo's due diligence prior to the acquisition did not identify any specific or increased risk of either modern slavery or human trafficking arising from the Mevalia and Comida supply chains, but our aim is to adopt the same principles and high standards to the new products added to the Vitaflo range.

All of Vitaflo's clinical nutrition products (including the newly-acquired Mevalia and Comida) are manufactured to the highest standards. In addition to Vitaflo's UK manufacturing facility, and the facility acquired in Germany following the acquisition from Dr. Schär, 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 the our own manufacturing standards and specifications. Wherever possible, we use Nestlé-approved raw materials suppliers which have been rigorously assessed for compliance with the Code and with Nestlé's responsible sourcing standards. This also ensures that we meet our responsibilities to patients using our products, and demonstrates Vitaflo's commitment to sustainable and ethical sourcing.

Our commitment on slavery and human trafficking

Vitaflo is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. Vitaflo has a small network of trusted comanufacturers and suppliers, many of whom have been collaborating with Vitaflo for many years. Suppliers are expected to adhere to the Code and since Vitaflo's first statement on slavery and human trafficking in 2018, compliance has become part of Vitaflo's standard contract with suppliers, and includes commitments on environmental and equality issues (as set out in the Code) as well as transparency that allows Vitaflo to ensure that no risk of modern slavery or trafficking arises. Vitaflo's suppliers are also required to submit to regular audits by Nestlé to ensure to the wider group's policy commitments which seek to eliminate the use of forced, compulsory or trafficked labour.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, when taking on a new supplier or collaborating with a co-manufacturer or other partner, Vitaflo will:

- Identify and assess potential risk areas in our supply chains.
- Ensure that the co-manufacturer or supplier adheres to the Code.
- Acquire raw materials from approved Nestlé suppliers where possible.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains by checking compliance with the Code and related policies.
- Protect whistle blowers and uphold Vitaflo's policy to protect employees wishing to disclose information about illegal or unethical practices.

Vitaflo has recently established a compliance committee which meets quarterly and reports any non-compliance with laws, regulations or the Nestlé standards and codes to Vitaflo's leadership. Employees are positively encouraged to come forward with any concerns.

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

Supplier adherence to our values

Vitaflo regularly evaluates the risk of modern slavery by incorporating the above due diligence practices into its processes for identifying and appointing new co-manufacturers and suppliers and 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 Code and with Vitaflo's wider commitments, including in relation to responsible sourcing.

Training

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.

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 Code 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 2022. It was approved by the leadership team on 25 April 2023.

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Caroline Charlesworth
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Caroline Charlesworth, on behalf of Vitaflo (International) Limited