

High Risk Ingredient Policy

1. Introduction & Purpose of the Policy

Holland and Barrett is Europe's largest and most trusted health and wellness retailer. With a global presence of more than 1,600 stores & partnerships across 19 countries, we ensure that the sustainability of our supply chain is a top priority. We sell a range vitamins, minerals, supplements, healthy food, sports nutrition and beauty which includes a range of innovative own brands, products and services. We want our customers to make informed choices about the products they buy from our stores and have the confidence and trust that Holland and Barrett promote and practices the highest standards of ethical and responsible sourcing.

Our integrity underpins every aspect of our operations and supply chains. We are committed to responsible business practices, transparent relationships, and continuous improvement, ensuring our actions reflect our values. This includes our commodities and or ingredients that make our products which includes long-term commitments to people and the planet.

The purpose of this policy is to define Holland & Barrett's approach to the responsible sourcing of High-Risk ingredients. It sets out the principles, expectations, and requirements for our suppliers, ensuring that environmental, social, and human rights risks associated with these ingredients are identified, assessed, mitigated, and continuously monitored. Given the wide range of raw materials in our products, we work diligently to ensure that these materials are sourced sustainably, ethically and responsibly. Using a risk-based approach, we have identified certain raw materials with significant environmental and social risks-classified as High-Risk Commodities. This policy sets out our commitment to sourcing, manufacturing, and supplying our products with these Ingredients in line with our standards, ensuring that key risks are understood, mitigated, and continuously monitored.

2. Scope and Application of the Policy

Holland & Barrett has identified eight high-risk ingredients also sometimes referred to as commodities—palm, soy, cocoa, timber, fish oil, coffee, tea, and collagen—based on their potential exposure to environmental, social, and human rights risks within global supply chains. There may be additional ingredients that also present elevated risk depending on sourcing geography, production practices, scale of use, and supplier maturity, and these are subject to ongoing risk screening and review.

At H&B, we recognize the potential negative impact that some of the raw materials used in our products and merchandise could have on people, animals and the natural environment.

Our supply chain can be long and complex and whilst H&B relationship is with its 1st tier partners, we expect our suppliers play their part in managing the supply chains below them which includes commodities and or ingredients.

This Policy will be implemented through our risk management processes, which include supplier risk assessments, supply chain transparency requirements which includes data reporting, declaration and demonstrations of key credible certifications, the enforcement of prohibited source lists, and the development of mitigation action plans where risks are identified.

Please note that the terms "commodities" and "ingredients" have been used interchangeably throughout the document as focuses on the raw materials and inputs used in our products and supply chains.

Where high-risk ingredients are involved, supplier risk assessments will be conducted which may include audits. The risk assessments will be documented, monitored, and used to benchmark performance and drive continuous improvement across our supply chain.

3. Responsible Sourcing: Understanding key drivers and mitigating key ingredient risks

High-Risk Ingredients due to the significant environmental and social risks that may arise at different stages of their production and supply. The primary risk drivers include, but are not limited to, the following:

- **EU Deforestation:**

Commodities including palm oil, cattle and cattle-derived products, soy, coffee, cocoa, timber, and rubber are considered **High-Risk Ingredients** due to their association with deforestation and land-use change.

From **December 2026**, these commodities must comply with the requirements of the **EU Deforestation Regulation (EUDR)**. In line with this regulation, Holland & Barrett will apply enhanced due diligence to these materials, and suppliers are expected to understand, assess, and address any potential deforestation risks associated with their production.

Suppliers sourcing or manufacturing products containing these commodities are required to demonstrate compliance with EUDR requirements, including but not limited to:

- Due Diligence statement **legal confirmation** that it has: carried out **due diligence** on the product, and **Concluded that the risk of deforestation and illegality is negligible**, in line with EUDR requirements.
- **Geolocation Data:** Provision of precise geographic coordinates (latitude and longitude) for farms or plots of land where the commodities are produced.
- **Cut-off Date:** Confirmation that commodities are not sourced from land that was deforested or degraded after **31 December 2020**.
- **Chain of Custody:** Maintenance of full traceability documentation from origin through to the final product supplied to Holland & Barrett.

Further detail on our approach to deforestation risk management and supplier expectations is set out in the **Holland & Barrett Deforestation Policy**.

Biodiversity: We seek to promote and support the protection and restoration of biodiversity across our own operations and throughout our supply chains. Suppliers are encouraged to assess biodiversity risks within their sourcing regions and to implement appropriate measures to avoid, reduce, and mitigate impacts on natural habitats. Commodities sourced from regions of high ecological importance will be subject to greater due diligence to ensure that the Ingredient is sourced in the most sustainable way possible

Water Stress: Commodities will be classified as **High-Risk** where their production requires significant water inputs and where sourcing occurs in regions experiencing **water scarcity or high water stress**.

Suppliers sourcing from water-stressed regions are encouraged to understand their water-related risks and to implement responsible water management practices, including water efficiency measures, sustainable irrigation, and actions to prevent water pollution.

Child labour: Some Ingredients are known to have a risk of child labour, especially at the farm or plantation level. As a result, we take a risk-based, proactive approach to identifying potential occurrences of child labour. Suppliers must:

- Submit evidence of due diligence and participate in digital traceability systems through Ideagen.
- Implement corrective action plans if risks are identified, with timelines agreed upon with H&B.

Human Rights infringements: Some Ingredients are known to have a risk of human rights infringements, especially at the farm, plantation or raw material processing level. We will take a risk-based approach to identifying potential human rights infringement and seek to source Ingredients that are traceable and which comply with our Supplier Code of Conduct and Human Rights Policy in the areas of:

- Child Labour ○ Forced Labour
- Migrant Labour
- Abuse, Harassment, Disciplinary Action ○ Fair and Equal Treatment/Discrimination
- Compensation & Benefits ○ Working Hours
- Trade Unions & Collective Bargaining ○ Land Rights

Animal Welfare: Some Ingredients present a risk of poor animal welfare in their sourcing and processing, and we will apply greater due diligence to such Ingredients to enforce our Animal Welfare Policy. We also do not condone animal testing on our own brand beauty products and aim to source all our beauty ranges

Transparency: We recognise that achieving supply chain transparency is essential for responsible sourcing. We will work closely with our suppliers to gain deeper visibility beyond Tier 1 supported by platforms such as Ideagen, previously Authenticate and Sedex.

4. High Risk Ingredients – Prohibited Sources

We have prohibited the use of the following materials as we have identified them as high-risk Ingredients due to the ways in which they are sourced or processed.

1. Certain Animal Products:

- Any animal derived bone or horn from rare and endangered species: Traditionally, leopard and tiger bone are used to produce a liquid health tonic and other traditional medicines, tonics and extracts in Asian countries. This practice continues to occur in China. H&B do not allow these materials in our products.
- Krill Oil – Any product that has Krill oil and/or supplements, blended products containing krill oil, any ingredient, extract, or derivative sourced from krill will not be sold in Holland and Barrett.

- **Shark Fins** : Any products containing fish oil derived from shark fins are prohibited. This is due to the negative impact that shark finning has had on shark species globally and the cruel practices involved, including some that are not already prohibited by the CITES ban. The pending UK Shark Fins Bill¹ would prohibit the import and export of shark fins in the UK, however, H&B prohibits the presence of shark fins in our products such as fish oil ahead of this Bill being passed, due to the cruel practices involved with shark finning².

Noncertified Fish Oil: Fish oil can be linked to unsustainable fishing practices that harm marine ecosystems and biodiversity. Holland & Barrett is committed to responsible sourcing by ensuring Sustainable fish stocks that does not lead to overexploitation, Protection of marine ecosystems, clear chain of custody from source to finished product, ensuring legal compliance and no illegal, unreported, or unregulated (IUU) fishing and Social responsibility. Fish oil from disputed regions such as the disputed territory of *Western Sahara* in the EU-Morocco trade and fisheries agreements is also not allowed to be used as an ingredient for Holland and Barrett. Products should be clearly labelled as originating in Western Sahara and not be marketed as Moroccan origin. The company is working towards requiring all fish oil and related products to be certified to robust, third party standards such as Friends of the Sea (FOS) Marine Stewardship Council (MSC) , ASC (Aquaculture Stewardship Council), Marine Trust to ensure sustain able, ethical, and fully traceable marine sourcing

2. Products made through Animal Cruelty:

Holland and Barrett are committed to the prevention of cruelty in their supply chain and as such, the use of monkey to harvest raw materials such as coconuts is banned. Due diligence will be undertaken to ensure our coconut supply chains remain free of this form of animal cruelty. Reference our Animal Welfare Policy.

3. Products associated through Forced Labour :

At Holland and Barrett, we are against any form of forced labour and as a result, will not source products from countries or regions where forced labour or exploitation against ethnic and indigenous minorities are identified in the supply chain globally.

There shall be no use of forced labour which includes exploitative recruitment practises.

Obligations under the national laws and regulations on forced labour such as EU Forced labour law and the UK Modern Slavery Act will be strictly followed

4. Unsustainable Palm Oil

Many of our owned food and beauty products contain palm oil. We have committed to moving away from sourcing unsustainable palm oil that has been linked to the unsustainable deforestation and the degradation of habitats, threatening wildlife including the Orangutan, which has become endangered due to unsustainable land use change.

- **Require Certification:** All suppliers must provide valid certification for palm ingredients or finished goods, ensuring compliance with robust third-party standards.
- **RSPO Commitment:** We will only stock products containing RSPO-certified palm oil and expect suppliers to work towards full RSPO certification, as outlined in our Deforestation Policy.
- **Ingredient /Commodity Mapping:** We are partnering with 3Keel to enhance supply chain visibility and conduct detailed ingredient mapping, enabling us to identify and mitigate deforestation risks at source.

Please contact our Responsible Sourcing team for certification or refer to the Appendix List of Palm Oil certifications

5. Uncertified wood, pulp and paper products

We are committing to sourcing materials from credibly certified wood pulp and paper fibre in our owned brand products for primary, secondary or tertiary packaging . This means that any wood pulp or paper material must come from responsibly managed forests, certified by the FSC or PEFC.

6. Non-Certified Tea

We are committed to supporting tea growers and sourcing all Own-branded tea from certified sources. Our approach prioritises standards that promote environmental stewardship and social responsibility, improving the welfare of workers and communities in tea-producing regions. Holland & Barrett expects all suppliers to work towards internationally recognised certifications such as Fairtrade, Rainforest Alliance, UTZ, and/or organic certification.

7. Non-Certified Soy

Soy is a key ingredient as Holland & Barrett expands its Food Range. Soy supply chains complex and can be associated with deforestation, habitat conversion, and biodiversity loss, particularly in South America, including ecologically sensitive regions such as the Cerrado savannahs and dry forests. With rising global demand, soy has become one of the world's largest agricultural crops and a major driver of land-use change. Holland & Barrett recognises these risks and will therefore adopt a flexible but robust sourcing approach, accommodating a range of responsible sourcing options based on risk and availability.

Holland & Barrett will support and accept the following approaches, depending on supply chain maturity and risk profile:

- Physically segregated certified soy, including: RTRS (Round Table on Responsible Soy) – Segregated / Organic
- Mass balance certified soy, including: ProTerra – Mass Balance, RTRS – Mass Balance
- Book & claim mechanisms, where physical segregation is not yet feasible: RTRS Credits
- Regional or national certification schemes, where recognised and credible: CRS / AMB (e.g. regional responsible soy standards)

8. Non Certified Cocoa

Cocoa is a key ingredient in many food products. Cocoa farmers face many challenges in the production which includes unfair pay and poor living and working conditions along with environmental issues affecting their crops. Research shows that cocoa farms and farmers are decreasing annually due to various sustainability threats they face. Apart from challenges in achieving a decent livelihood, cocoa farms are high risk for forced labour, worst forms of child labour, unsanitary housing, poor working conditions and long working hours. The acceptable certifications include :

- Valid Fairtrade certification
- Valid Rainforest Alliance (UTZ) certified
- 100% Fairtrade and or Fairtrade Sourcing Ingredient (FSI)

9. Uncertified Fruits , Nuts and Seeds

Holland & Barrett sources a wide variety of nuts and dried fruits year-round, including cashews, almonds, dates, and dried fruits such as bananas, from international origins. These Ingredients provide vital employment and income for millions of workers in developing countries but are also associated with labour, health and safety, and chemical exposure risks.

Suppliers must ensure that farms and processing sites are certified to recognised international standards.

Acceptable certifications include Fairtrade, Organic, Rainforest Alliance, or, for fruit and vegetable supply chains (including bananas), GLOBALG.A.P. Fruit and Vegetable certification.

Suppliers are expected to maintain valid certification, demonstrate compliance upon request, and support continuous improvement in worker welfare, safe working conditions, and environmental practices.

9. High Risk Minerals

Holland & Barrett is committed to eliminating the use of mica and talc in its owned-brand product lines due to the high risk of child and forced labour associated with the extraction of these minerals. To ensure minerals are sourced responsibly, Holland & Barrett aligns with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Holland & Barrett recognises that other conflict minerals may present similar risks. In line with the European Union Conflict Minerals Regulation, this includes:

- Tantalum
- Tin
- Tungsten
- Gold (3TG)

These minerals are prohibited in owned-brand products unless they are demonstrably responsibly sourced. Where the use of any conflict mineral is unavoidable as a component ingredient in an ownedbrand product, suppliers must:

- Source from suppliers that do not condone or contribute to forced or child labour

- Implement robust supply chain due diligence in line with OECD guidance
- Provide credible third-party certification or assurance upon request to verify responsible sourcing

10. Uncertified Shea

Many Holland & Barrett owned-brand beauty products contain shea, commonly used in the form of shea nut oil (shea butter). Shea butter is produced from the kernels of shea seeds, sourced from shea trees found across sub-Saharan West, East, and Central Africa.

The collection and processing of shea provides essential employment and income for millions of people, particularly women in rural communities. While shea is generally regarded as a sustainable natural ingredient, there are recognised safety, labour, environmental, and economic risks associated with its harvesting and processing.

Holland & Barrett is committed to working collaboratively with partners across the value chain to address these risks and drive continuous improvement. We therefore require that shea used in our owned-brand beauty products is sourced only from suppliers aligned with recognised international standards, including those supported by the Global Shea Alliance (GSA) or equivalent credible initiatives.

Suppliers must be able to demonstrate compliance with these standards and support transparency, ethical labour practices, and sustainable environmental management

11. Non-Certified Coffee

We are committed to supporting Coffee growers and sourcing all Own-branded coffee from certified sources. Our approach prioritises standards that promote environmental stewardship and social responsibility, improving the welfare of workers and communities in tea-producing regions. Holland & Barrett expects all suppliers to work towards internationally recognised certifications such as Fairtrade, Rainforest Alliance, UTZ, and/or organic certification.

12. CITES (Convention on International Trade in Endangered Species)

CITES refers to the strict prohibition of international commercial trade in wild animals and plants listed under Appendix I of the treaty. These bans protect species threatened with extinction, covering live specimens, parts, and products like ivory, leather, and medicines. Appendix 1,2 and 3 are followed under this convention. While Appendix 1 is commercially banned, 2 and 3 are controlled via permits and certificate of Origin. The products and ingredients can be found in CITES website.

5. Compliance

Compliance with our high-risk Ingredient policy will be monitored in the following ways:

Customer Contacts

Customers are able to contact the business regarding any queries, concerns or complaints. Our dedicated team will aim to deal with the enquiry and investigate.

Third party audits & Certifications

- Audits will be regularly conducted across the supply chain. Suppliers will be subject to regular audit with all findings recorded, tracked, and reviewed.
- The audit of suppliers will record any issue that could jeopardise ingredient safety for the consumer the supplier integrity and their associated ethical standards, and the quality management systems in place.
- Certifications: Relevant credible certifications applicable to the products in line with transparency and sustainability will be requested from suppliers
- Due Diligence: Further independent product testing and Due Diligence will be conducted.
- Supplier visit: Conduct regular supplier visits to review levels of compliance to their associated standards. These visits should be conducted [unannounced](#).

Appendix

Certification name	Website	Certification Description
Regenerative Organic Certified	ROC	An international standard that sets requirements for soil health, animal welfare, and farmworker fairness
Fair for Life	FFL	An international, voluntary standard that sets requirements for third-party certification of fair trade and organic input and chain of custody
The Union for Ethical Biotrade	UEBT	An international standard promoting the conservation of biodiversity, respecting traditional knowledge and assuring the equitable sharing of benefits all along the supply Chain
Roundtable on Sustainable Palm Oil Identity Preserved Standard	RSPOIP	An international standard designed to assure palm oil production is sustainable: legal, economically viable, environmentally appropriate and socially beneficial
Roundtable on Sustainable Palm Oil Segregated Standard	RSPOSG	An international standard designed to assure palm oil production is sustainable: legal, economically viable, environmentally appropriate and socially beneficial. Segregated assures sustainable palm oil from different certified sources, kept separate from ordinary palm oil throughout supply chain
Rainforest Alliance	RA	An international standard assuring product or ingredient was produced using methods that support the three pillars of sustainability: social, economic, and environmental.

¹ UK Shark Fins Bill: <https://bills.parliament.uk/bills/3207>

² Shark Finning: <https://ocean.si.edu/ocean-life/sharks-rays/shark-finning-sharks-turned-prey>

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