



Modern Slavery Statement

This statement addresses the financial year ending December 31, 2023, in compliance with the requirements of the United Kingdom Modern Slavery Act 2015, the California Transparency in Supply Chains Act 2010, and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023. It also provides additional information on Whole Foods Market's human rights and labor programs. For the purposes of this Statement, we use the term "modern slavery" to mean child labor, forced labor, and human trafficking in any form – including slave labor, prison labor, indentured servitude, or bonded labor.



INTRODUCTION

Whole Foods Market, Inc. was founded in Austin, Texas in 1978, but has continued to expand in the grocery industry in the years since its inception. The company currently operates approximately 550 retail stores across the United States, Canada, and the United Kingdom and employs approximately 97,334 full- and part-time team members. Retail grocery operations were expanded into Canada through acquisitions of Fresh Fields Markets Canada, Inc. in 1996, and Wild Oats Markets Canada, Inc. in 2007. Whole Foods Market Canada, Inc., a Canadian corporation, and Whole Foods Market-WO, Inc., a British Columbia corporation, operate 14 stores in Canada, and employ approximately 2,212 team members. Fresh & Wild Ltd. opened in London in 1998 and was acquired by Whole Foods Market, Inc. in 2004. Fresh & Wild Ltd., a private limited company of England and Wales, operates seven stores in the United Kingdom, and employs approximately 739 team members.

In line with the philosophy of their parent company, Whole Foods Market, Inc., Whole Foods Market Canada, Inc, Whole Foods Market-WO, Inc., and Fresh & Wild Ltd. (collectively referred to herein as “Whole Foods Market”) are committed to responsible sourcing and eradicating child labor, forced labor – 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 child labor, modern 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 labor 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. For the purposes of this Statement, we use the term “modern slavery” to mean child labor, forced labor, and human trafficking in any form - including slave labor, prison labor, indentured servitude, or bonded labor. 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. All Whole Foods Market suppliers are required to follow our [Supplier Code of Conduct](#). We reinforce this requirement by including it in all Whole Foods Market supplier contracts.

Our Supplier Code of Conduct focuses on preventing child labor and situations that can put workers at risk of forced labor. We do not tolerate the use of child labor. Suppliers are required to engage workers who are: at least 15 years old, the age of completion of compulsory education, or the minimum age to work in the country where work is performed, whichever is greater. In accordance with international labor standards, light, non-hazardous work is permitted only if the child performs the work for their parents or relatives in ways that do not jeopardize their education, health, schooling, or personal and physical development.

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 Supplier Code of Conduct reflects domestic and foreign migrant workers' unique vulnerability to situations of modern slavery and makes 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 child labor, modern 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.



Responsible Mineral Sourcing

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. The Whole Foods Market Supplier Code of Conduct sets forth our expectations that all of our suppliers participate in diligence to identify the origin and chain of custody 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 and comply with any disclosure requirements mandated by the Securities and Exchange Commission.

Training

Whole Foods Market has implemented a training program for its employees on its responsible sourcing guidelines. This training underlines Whole Foods Market's standards regarding child labor, forced labor, and human trafficking. In addition, responsible sourcing training documentation is available to all Whole Foods Market employees who manage supplier relationships. In 2024, Whole Foods Market will launch and enhanced and expanded training for suppliers and employees.

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. 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 risk of modern slavery.

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

We are also 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 all 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.

Assessing Risk and Awarding Business

Before awarding business to a new supplier, Whole Foods Market considers the social accountability risk of the commodity and supplier, as well as whether that risk has been sufficiently mitigated. We use two U.S. government resources to determine risk by commodity type and geographic area - the [U.S. Department of Labor List of Good Produced by Child or Forced Labor \(ILAB List\)](#) and the [U.S. Department of State Trafficking in Persons Report \(TIP List\)](#). We also monitor media, U.S. Department of Labor findings, and NGO reports to track social accountability risks. When a supplier or commodity type is deemed high-risk, we require additional due diligence, such as a third-party certificate or social accountability audit. If a supplier is unable to provide the required due diligence documentation to demonstrate effective risk mitigation, we will not award or renew business to that supplier.

Whole Foods Market operates a policy of continuous improvement. We will investigate any claim of possible human rights issues with a supplier, and we are committed to working with our suppliers to improve protections for their workers and workplace. We reserve the right to terminate a relationship at any time for failure to meet our Supplier Code of Conduct, however, we strive to always put the interests of workers first. Termination will be considered when a supplier refuses to cooperate with an assessment, refuses to change a required behavior or practice, does not make timely progress on remediation, or engages in falsification or misrepresentation of records or other illegal or deceitful activity.

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.

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](#)
- [Regenerative Organic Certified](#)

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 coffee 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.

RESPONSIBLE SOURCING OF FRESH PRODUCE AND FLORAL

Our Social Accountability Policy for Produce and Floral aims to mitigate risk in our produce and floral supply chains. Our policy requires products or suppliers that are deemed high-risk to provide either a third-party certificate or social accountability audit. Documentation is required during onboarding and through annual compliance maintenance.

REMEDIATION

As Whole Foods Market continues to engage with suppliers, we remain committed to human rights and acceptable work conditions in our supply chain. We investigate all allegations of forced or child labor and have found no evidence of forced or child labor in our supply chains. In cases where remediation measures are taken, we will consider whether additional steps are necessary to address the income loss experienced by the most vulnerable families impacted by these measures.

APPROVAL AND SIGNATURE

This statement was reviewed in 2024 by Whole Foods Market's Legal and Quality Standards Team on behalf of Whole Foods Market, including Fresh & Wild Ltd., Whole Foods Market Canada, Inc., and Whole



Foods Market WO-Inc., and has been approved by the governing bodies of each of the aforementioned entities.

In accordance with the requirements of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Whole Foods Market Canada, Inc. and Whole Foods Market WO-Inc. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the 2023 reporting year.

DocuSigned by:
Rick Bonin
65ADE9CF0FF849A...

Rick Bonin
Senior Vice President
May 1, 2024

I have the authority to bind the above entities. For clarity, this attestation is provided in my capacity as director of Fresh & Wild Ltd., and Assistant Secretary of Whole Foods Market Canada, Inc. and Whole Foods Market WO-Inc., only, and not in my personal capacity.