



Vita Coco Statement on Modern Slavery

Updated June 2026

This Modern Slavery and Human Rights Position Statement, issued by The Vita Coco Company, Inc. (“Vita Coco” or “Company”), applies to Vita Coco and its subsidiaries and outlines the measures we have implemented and continue to undertake to assess and mitigate the risk of modern slavery and human trafficking within our operations and supply chain. This statement is made in accordance with the UK Modern Slavery Act 2015 (the “MSA”) and made pursuant to section 54 of the MSA, and includes disclosures intended to comply with California’s Transparency in Supply Chains Act.

To comply with the MSA, this statement has been reviewed and approved by All Market Europe, Inc.’s Board of Directors, which affirms its commitment to the principles, duties, and responsibilities described herein. The statement can be accessed online on our Investors Relations website.

Our Organization Structure & Business

Vita Coco is a coconut water focused beverage business built on an asset light global supply chain. We pioneered packaged coconut water in 2004 and have extended our business into other categories. Our mission is to deliver great tasting and nutritious products that we believe are better for consumers and the world. We are one of the largest brands globally in the coconut and other plant waters category, and a large supplier of private label coconut water.

Our branded portfolio is led by our *Vita Coco* brand, which is the leader in the coconut water category in the United States, and includes coconut oil, juice, and non-dairy coconut milk offerings. Our portfolio also includes *PWR LIFT*, a protein-infused fitness drink. Additionally, we supply private label products to key retailers in both the coconut water and coconut oil categories.

As of December 31, 2025, we source our coconut water through a well-diversified global manufacturing network that spans 16 coconut water processing facilities across six countries, operated by our manufacturing partners, as well as six co-packing facilities in four countries for products not packaged near the source. As we do not own any of these facilities, our supply chain operates under an asset-light model. This network provides substantial production capacity and flexibility, enabling us to reallocate coconut water sourcing in response to supply chain disruptions, weather conditions, logistical challenges, shifts in consumer preferences, or other macroeconomic factors.



P: (212) 206-0763 | F: (646) 374-1758 | vitacoco.com



Vita Coco is available in over 35 countries, with our primary markets in North America, the United Kingdom, and Germany. Our products are distributed primarily through club, food, drug, mass, convenience, e-commerce, food service channels and a variety of on-premise locations such as corporate offices, fitness clubs, airports, and educational institutions.

Vita Coco's management has put in place a risk management program to identify, assess, and mitigate risks associated with our business operations and alignment with our mission. The Vita Coco Company's Board of Directors is responsible for overseeing this risk management program and delegates oversight of sustainability matters to its Nominating, Environmental, Social, and Corporate Governance ("NESG") Committee. Governance of sustainability matters includes monitoring our policies, programs, and strategies related to climate change risks, environmental stewardship, responsible investment, human rights, human capital management, diversity and inclusion, and other social and public matters of significance to the Company. The executive leadership team and management are responsible for developing and implementing our social impact and sustainability framework, which the NESG Committee oversees and monitors to ensure our progress aligns with our public benefit purpose. Reporting to the NESG Committee regularly, our Social Impact and Sustainability Group is comprised of cross functional leaders responsible for the daily implementation of our strategy.

Further details on our business's governance are set out in our 2025 Annual Report on Form 10-K, publicly available on our [Investor Relations website](#).

Respecting Human Rights

In alignment with the principles of the United Nations Universal Declaration of Human Rights, the Company recognizes its responsibility to help protect, preserve and promote human rights. Our responsibility to uphold these principles is at the core of our overall business ethos. It influences our interactions with employees, shapes our training initiatives, and guides our collaborations with partners.

We are committed to acting ethically and in a responsible manner within our organization and with our business partners. We strive to identify and address salient human rights issues within our operations and value chain.

The following areas are the foundation of our global program:

- **Diversity and Inclusion:** We actively promote a diverse, and inclusive workplace where all workers are treated with equal dignity and respect. Discrimination based on race, sex, color, national origin, ethnicity, religion, age, disability, sexual orientation, marital



P: (212) 206-0763 | F: (646) 374-1758 | vitacoco.com



status, pregnancy, gender identity or expression, or any other protected category under applicable law is strictly prohibited.

- **Freedom of Association:** Workers have the right to join or establish labor unions without fear of retaliation, intimidation, violence, or harassment. In cases where domestic laws limit this freedom, we support alternative means for workers to engage in collective dialogue with management.
- **Freedom from Forced Labor:** We unequivocally prohibit any form of forced labor, including involuntary prison labor, indentured labor, bonded labor, military labor, slave labor, or human trafficking. Terms and conditions of employment must be clearly communicated in a language understood by each worker. Coercion, deception, fee payment, or the surrender of personal documents for securing employment is strictly prohibited.
- **Safe and Healthy Workplace:** We are committed to providing workers with secure, safe, and healthy workplaces. Harassment, whether verbal, physical, sexual, or any conduct creating a hostile work environment, is not tolerated. We take measures to minimize accidents, injuries, and health risks within our operations.
- **Wages and Work Hours:** Workers must be fairly compensated in accordance with national laws, industry standards, and local labor markets. Overtime is compensated at an appropriate premium, and workers are entitled to reasonable rest periods and days off.
- **Land Rights:** We respect communities' legal and customary property rights, refraining from land grabs. Indigenous communities must be adequately informed and consulted in land acquisition processes, adhering to the principle of free, prior, and informed consent.
- **Environmental Stewardship:** We adopt a human rights-based approach to environmental management, assessing local risks, partnering with stakeholders, and implementing human centered solutions. We strive to actively reduce our environmental impact and carbon footprint, while also protecting natural resources and biodiversity.
- **Freedom from Child Labor:** We strictly prohibit the employment of children under the age of 15 or under the legal age for work or compulsory schooling, whichever is higher. Any exceptions must align with permissible "light work" as defined by International Labor Organization ("ILO") 138 or applicable law. Additionally, we do not hire anyone under 18 years old for hazardous work, and we verify employees' ages upon hiring.
- **Consumer Wellbeing:** Our commitment to human rights extends to our customers and consumers. We practice responsible marketing, provide transparent nutritional information, and offer a variety of beverage options to enable informed choices consistent with a healthy lifestyle.
- **Privacy Rights:** We uphold the privacy rights of individuals and employ appropriate measures to safeguard personal and confidential information, as outlined in our [privacy](#)



P: (212) 206-0763 | F: (646) 374-1758 | vitacoco.com



[policy](#). We continuously review our practices to ensure we are using personal information prudently and responsibly.

Supplier Code of Conduct

As the foundation of our Supplier Code of Conduct (the “Code”), we require our suppliers to comply with all applicable laws and regulations in the jurisdictions where workers are employed, including those at the federal or national, state or provincial, and local levels. We expect our coconut manufacturing suppliers to act in alignment with the above rights as outlined in the Code and aligned with the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work. The Code describes the human rights standards we expect our first-tier suppliers to uphold and prohibits the use of all forms of forced labor, including trafficked, indentured or bonded labor. To ensure accountability, coconut manufacturing suppliers are expected to adhere to our Supplier Code of Conduct which is reinforced through our third-party audits. More details can be found [here](#).

Code of Business Conduct & Ethics

Our Code of Business Conduct & Ethics provides general guidelines for conducting the business of the Company. The Company adheres to these guidelines, and we expect all employees to follow this code. Relevant topics covered by the Code include anti-corruption and compliance, employee health & safety, fair employment practices, harassment and discrimination, and violence prevention. All employees and directors, whether located in the United States or internationally, have a duty to report any known or suspected violation of this Code, including violations of the laws, rules, regulations or policies that apply to the Company. More information can be found [here](#). Not only are new hires required to complete training on our Code of Business Conduct & Ethics, all employees receive an annual refresher on the Code through our required internal training as detailed below.

Diversity, Equity, and Inclusion

Our diversity, equity and inclusion mission is to authentically grow the Company as an inclusive employer, brand, and product of choice ensuring that we win as a team, embed purpose in everything we do, and learn along this journey. We want to see a socially inclusive, fair future – both within our business and the wider society.

We are committed to providing equal opportunities for all employees and are dedicated to creating and maintaining a work environment that is free from discrimination and harassment on the basis of race, ethnicity, national origin, gender, gender identity and expression, sexual orientation, age, disability, religion, or any other protected characteristics. We engage external industry experts to help identify ESG risks and enhance our team’s understanding of human rights issues.



P: (212) 206-0763 | F: (646) 374-1758 | vitacoco.com



Due Diligence, Risk Management, & Accountability

Vita Coco's policy framework is supported by its publicly available Code of Business Conduct and Ethics, Supplier Code of Conduct, and this Statement on Modern Slavery, which set clear expectations for ethical behavior, compliance with applicable labor laws, and the prohibition of forced labor and child labor within its operations and supply chains. These policies apply to employees as well as third-party suppliers and partners. For example, we are beginning to require our co-manufacturers and co-packers to comply with our Supplier Code of Conduct, including standards on forced and child labor. Together, these policies reinforce our commitments to fair labor practices, human rights, and ethical business conduct, and form the foundation for Vita Coco's due diligence approach.

Building on this foundation, our due diligence process is a robust and comprehensive framework designed to monitor and address human rights risks across our operations and supply chain. A key component of this framework is supplier oversight through established audit and monitoring mechanisms. We engage an independent third party to conduct annual SEDEX Members Ethical Trade Audits of our key suppliers. These audits assess labor standards (including evaluating risks related to forced labor, human trafficking, and modern slavery), health and safety, environmental performance, and business ethics, helping us strengthen responsible sourcing practices and drive continuous improvement across our supply chain, and ensure adherence to ethical labor practices and human rights standards.

When audits identify any material non-conformances, we may work with suppliers to implement corrective action plans, and we may escalate remediation expectations where warranted. We also conduct internal due diligence reviews during supplier onboarding and periodically thereafter, including screening suppliers and geographies and incorporating risk findings into sourcing decisions and prioritization as well as ongoing dialog with suppliers.

Furthermore, our finance control processes play a vital role and rigorously evaluate our supply and value chain partners to ensure we are engaging with bona fide organizations. Vita Coco also engages in internal auditing assessments of our processes and control systems. We also conduct desktop assessments, which leverage data from government and NGO country-level trade and labor statistics, peer-reviewed academic journals, NGO and industry reports, and media sources.

Employees may report issues through our anonymous employee hotline or online portal—Ethico.

These processes are part of our overall enterprise risk management review that are part of our proxy disclosures.





To measure the effectiveness of our processes, we regularly review various metrics, including with respect to resolution of corrective action plans, supplier scores, and resolution of employee claims.

Training

Vita Coco routinely engages and trains its applicable supply chain partners in addressing and educating on human rights and modern slavery issues and requires all suppliers to be in compliance with all applicable laws and regulations.

Employees undergo annual training which covers topics that include diversity, equity, and inclusion and the Code of Conduct. Company employees who engage with coconut manufacturing suppliers are also educated to recognize and avoid modern slavery practices. We continue to explore and refine approaches to measuring our ESG impacts. For more information, please refer to our [2025 Impact Report](#).

Reviewed & Approved on the 23rd 2026 by:

Timothy Rees – Managing Director, All Market Europe Ltd

Martin Roper – Chief Executive Officer, The Vita Coco Company and Director, All Market Europe Ltd



P: (212) 206-0763 | F: (646) 374-1758 | vitacoco.com