



Vita Coco Statement on Modern Slavery

Updated April 2024

This Modern Slavery and Human Rights Position Statement, issued by The Vita Coco Company, Inc. (“Vita Coco” or “Company”), 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 in compliance with the UK Modern Slavery Act 2015 (the “MSA”) and made pursuant to section 54 of the MSA.

Our Organization Structure & Business

The Vita Coco Company is a leading platform for brands in the functional beverage category. We pioneered packaged coconut water in 2004 and have extended our business into other categories. Our mission is to deliver great tasting, natural 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 offerings. Our other brands include *Ever & Ever*, a sustainably packaged water, and *PWR LIFT*, a protein-infused fitness drink.

We source our coconut water from a diversified global network of 14 factories across six countries supported by thousands of coconut farmers. As we do not own any of these factories, our supply chain is a fixed asset-lite model designed to better react to changes in the market or consumer preferences. We also work with co-packers in America and Europe to support local packaging and repacking of our products and to better service our customers’ needs.

Vita Coco is available in over 30 countries, with our primary markets in North America, the United Kingdom, and China. Our primary markets for Private Label are North America and Europe. Our products are distributed primarily through club, food, drug, mass, convenience, e-commerce, and foodservice channels. We are also available in a variety of on-premise locations such as corporate offices, fitness clubs, airports, and educational institutions.

Further details on our business are set out in our [2023 Annual Report on Form 10K](#) and [Investor Relations website](#).

Respecting Human Rights



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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, equitable, 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 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 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.



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

Supplier Code of Conduct

We expect our coconut manufacturing suppliers to act in alignment with the above rights as outlined in our Supplier Code of Conduct (the "Code"), which is informed by 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 required to adhere to our Supplier Code of Conduct which is reinforced through our third-party audits.

Code of Business Conduct & Ethics

Our Code of Business Conduct & Ethics provides general guidelines for conducting the business of the Company, consistent with the highest standards of business ethics. It includes a higher standard than required by commercial practice or applicable laws, rules or regulations. The Company adheres to these higher standards, 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](#).



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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.

Due Diligence, Risk Management, & Accountability

Our due diligence process is a robust and comprehensive framework designed to monitor and address risks associated with human rights within our operations and supply chain. At the core of our efforts, we conduct SMETA (SEDEX Members Ethical Trade Audits) audits of our key suppliers, ensuring that they adhere to ethical labor practices and uphold human rights standards.

Additionally, we employ a due diligence process to continuously assess suppliers and partners with whom we do business.

Furthermore, our finance control processes play a vital role—we 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 conduct desktop assessments including monitoring the Organization for Economic Co-operation and Development's ("OECD") Guidelines for Multinational Enterprises on Responsible Business Conduct, the US Department of State Advisories, and various NGO risk tools examining human rights.

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



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

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 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.

Reviewed & Approved on the 15th April 2024 by:

Timothy Rees – Managing Director, All Market Europe Ltd

Martin Roper – Chief Executive Officer, The Vita Coco Company



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