HELLOFRESH
GROUP

Non-Financial Report 2024

HelloFresh SE

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General Disclosures

Basis for Preparation

General Basis for Preparation of the Combined Non-Financial Report

This report represents the combined non-financial report for HelloFresh SE and HelloFresh Group (further "the HelloFresh Group") for the reporting period 1 January to 31 December 2024, in accordance with Section 289b through Section 289e, and in conjunction with Section 315b and Section 315c of the German Commercial Code (HGB). In addition, the HelloFresh Group complies with the requirements of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (hereinafter referred to as the EU Taxonomy Regulation) with this non-financial Group report (see the chapter on EU Taxonomy).

The Corporate Sustainability Reporting Directive (CSRD) was enacted by the European Union (EU) in January 2023. All EU member states were obliged to transpose the directive into national law by July 2024. In Germany, however, the directive was not transposed by 31 December 2024. As a result, for 2024 non-financial reporting, the previously implemented Non-Financial Reporting Directive (NFRD) remains unaltered, and we have prepared a non-financial report in accordance with the HGB. As such, no recognized framework was used in the preparation of this report.

We have nevertheless focused on implementing CSRD requirements and the European Sustainability Reporting Standards (ESRS) throughout 2024, and have thus prepared this report in orientation to the ESRS as follows:

- Performance of the double materiality assessment in orientation to ESRS 1 - General Requirements.
- Structure of the report comprising the sections General Disclosures, Environment, Social, Governance, as well as the general presentation of policies, actions, targets and metrics in each chapter.
- Presentation of information guided by disclosure requirements in ESRS 1 - General Requirements, Appendix B ("Qualitative Characteristics of Information").
- Where possible, adhered to the structure of presenting information as outlined in ESRS 2 - General Disclosures, and the relevant topical standards.

This report has been subject to a limited assurance engagement by PricewaterhouseCoopers GmbH Wirtschaftsprüfungsgesellschaft (PwC) in accordance with International Standard on Assurance Engagements (ISAE) 3000 (revised). Please see the assurance statement in the "Independent assurance practitioner's report" section. Beyond the assurance provided by PwC, none of the metrics in this combined non-financial report have been subject to any other assurance by an external body.

Disclosures in Relation to Specific Circumstances

Consolidation Scope

The scope of consolidation is the same as for the HelloFresh Group consolidated financial statements. For more information on the consolidation scope, see note 3, "Summary of Material Accounting Policies", of the consolidated financial statements in the 2024 HelloFresh Group Annual Report. Where identified as material in our double materiality assessment (described in the subchapter "Material Topics and their Interaction with our Strategy and Business Model"), the disclosures provided in the topic-specific chapters on policies, actions, metrics, and targets are extended to include upstream and downstream value chain information. No information corresponding to intellectual property, know-how, or the results of innovation has been omitted from the combined non-financial report.

Sources of Estimation, Assumptions, and Judgements

In specific cases, the preparation of the combined non-financial report requires management to make assumptions, approximations, and judgements on topics related to Environmental, Social, and Governance (ESG) performance. Extrapolations for metrics related to the HelloFresh Group's own operations are generally prepared based on the number of boxes shipped or amount of revenue generated, however certain situations may require the use of more appropriate, metric-specific proxies. In cases where metrics require upstream and/or downstream value chain data that is not directly available, indirect sources, such as sector-average data or other proxies, are used.

Information on any significant assumptions, approximations, or judgements made is presented in the accompanying notes alongside the metrics, where relevant.

General Information

Oversight and Governance of Sustainability Matters at the HelloFresh Group

The HelloFresh Group is managed and controlled by a dual management system, with both a Supervisory Board and a Management Board in place. The Supervisory Board is composed of five members. All (100%) members of our Supervisory Board are independent and without conflicting interests, positions, associations, or relationships that could bias their decision-making. Together, our Supervisory Board members bring a wealth of experience relevant to the sectors, products, and geographic locations where the HelloFresh Group operates, providing us with the expertise required to support the Management Board and the company in navigating the sectors and landscapes that we operate in. Specifically regarding ESG topics, our co-founder and Management Board member Thomas Griesel, has overall accountability.

Our (Senior) Directors drive and oversee progress on ESG matters as well as the implementation of the HelloFresh Group's global sustainability strategy. This also includes our Human Rights Officer, who oversees the alignment to the requirements of the German Supply Chain Act[1]. Directors work closely with and receive regular updates from our ESG topic leads, who are responsible for driving company-wide measures, monitoring progress on targets, and supporting regional sustainability managers in the local implementation of measures.

Roles and Responsibilities

The Management Board and Supervisory Board work together in a spirit of trust for the benefit of the company. The Supervisory Board acts as the controlling and monitoring body of the company; it advises and supervises the Management Board in its work and is involved in all fundamental decisions. The Boards maintain regular contact through plenary sessions and topic-specific committees. In 2024, there were four Supervisory Board committees: the Executive and Nomination Committee, the Audit Committee, the Remuneration Committee, and the ESG Committee.

The ESG Committee is chaired by our Chairman of the Supervisory Board, John H. Rittenhouse, and is additionally composed of three other members with experience in and expertise on sustainability matters: Ursula Radeke-Pietsch, Derek Zissman, and Michael Roth. The ESG committee monitors, advises, and has oversight over the actions and decisions of the Management Board on environmental, social, governance, sustainability, health and safety, and social responsibility matters, and where needed, establishes a monitoring system.

For further information on the composition of our Supervisory and Management Board, and their roles and responsibilities, please refer to the Report of the Supervisory Board in our 2024 Annual Report.

Integration of Sustainability-Related Performance in Incentive Schemes

To incentivize sustainable and future-oriented action, the achievement of our 2025 environmental targets to reduce greenhouse gas (GHG) emissions and food waste from our meal-kit, ready-to-eat, and other businesses' production facilities are directly linked to management performance indicators, and represent 20% of the long-term variable compensation for each member of the HelloFresh Management Board. Currently, targets for our meal-kit and other businesses (principally represented by our ready-to-eat product category) are separate. This is due to two reasons: the rapid development of these other businesses and the difference in operations compared with our meal-kit business. The production of ready-to-eat meals has a different energy consumption and food waste generation profile due to the cooking processes involved.

Our targets are described in detail under the following subchapters:

- [Targets related to Climate Change Mitigation and Adaptation](#)

- [Targets related to Resource Use and Circular Economy](#)

The Supervisory Board determines the performance targets for the Management Board's long term variable compensation, and the annual general meeting of HelloFresh SE approves the compensation system.

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[1] Also known as the [Lieferkettensorgfaltspflichtengesetz (LkSG)](#), a German law obliging companies to respect human rights by implementing a human rights due diligence system for their own operations and value chain.

Statement on Due Diligence

Our due diligence processes identify, assess, prevent, mitigate, and account for how we address our impacts on the environment and people in our own operations, and in our upstream and downstream value chain, including through our products or services and our business relationships.

We identify and assess (potential) adverse impacts through our annual double materiality assessment, as described in the chapter "Management of Material Topics". In compliance with the HGB, this non-financial report includes all topics deemed material for the HelloFresh Group relating to environmental matters, employee matters, social matters, respect for human rights, anti-corruption, and anti-bribery. Please see subchapter "Material Topics and their Interaction with our Strategy and Business Model" for descriptions of the corresponding material topics for the HelloFresh Group. Our processes to prevent, mitigate and account for potential adverse impacts are described in the topic-specific chapters of this report.

To deliver on our own ethical commitments and comply with legislative requirements, including the German Supply Chain Act, we have developed a comprehensive Ethical Trading Program. The key elements and results of this program are described in the chapter "Workers in our Value Chain".

Risk Management and Internal Controls over Sustainability Reporting

The HelloFresh Group has implemented a structured system of internal controls over financial reporting (ICFR), aligned with internationally recognized frameworks, to identify, evaluate, and mitigate risks that could impact the accuracy and reliability of the individual and consolidated financial statements. Beyond financial reporting, the HelloFresh Group's internal control framework extends to non-financial reporting, with the aim to have a holistic approach to risk management.

In 2024, we expanded the scope of internal controls on ESG reporting. The integration of risks related to non-financial reporting into our group internal control framework is an ongoing process, and will continue throughout 2025 and beyond. Policies and procedures establish control activities that form part of the HelloFresh Group's internal control system, addressing identified risks, including those related to Compliance Risk Management. Risks identified during the risk assessment and deemed critical by management are mitigated through targeted control activities.

A dedicated risk management function at the HelloFresh Group identifies and assesses ESG risks linked to our business operations that could have a high negative impact both internally and externally, and outlines the actions to mitigate them. The 2024 risk assessment did not identify any material risks related to HelloFresh's business model, business relations, products, or services that are highly likely to occur and that have or will have a severe adverse impact on the reportable aspects.

This exercise also considers elements from the risk management regarding human rights and environmental matters, as part of our Ethical Trading Program. This Program is further described in chapters "Own Workforce" and "Workers in our Value Chain". Our Annual Report contains additional information on opportunities and risks, as well as a detailed presentation of our risk management system; please refer to chapter 5 "Risk and Opportunity Report" of the Annual Report for more information.

Strategy & Business Model

Strategy, Business Model, and Value Chain

Key Elements of the HelloFresh Group's Strategy, Business Model, and Value Chain

We have built a strong, trusted brand over the years, and currently operate in 18 countries: Australia, Austria, Belgium, Canada, Denmark, France, Germany, Ireland, Italy, Luxembourg, the Netherlands, New Zealand, Norway, Spain, Sweden, Switzerland, the United Kingdom, and the United States. The meal-kit market is our primary product category and is represented by our HelloFresh, EveryPlate, Green Chef, and Chefs Plate brands. We also operate a direct-to-consumer ready-to-eat product category, represented by our Factor and Youfoodz brands, and other food-related business such as GoodChop, delivering high-quality meat and seafood from domestic family farms and fisheries, and the Pets Table, our premium pet food brand. In 2024, we continued to increase our other food-related businesses, for example by expanding the Factor brand into other nutrition categories. As a first step, the recently launched Factor Form brand offers greens powders, protein powders and hydration products for on-the-go nutrition support.

Our business model allows us to manage a shorter supply chain compared to those used by grocery stores, and we operate on an agile make-to-order basis which gives us greater control over our resources and waste management. For further information on the business model and various activities of the HelloFresh Group, please see chapter 1 "Fundamentals of the Group" of the Annual Report.

Throughout this report we refer to the HelloFresh Group's activities globally, however, in certain instances, it is necessary to differentiate between our North American segment, which includes the United States and Canada, and our International segment (all other 16 countries listed above). In some instances, we further specify regions, such as DACH (Germany, Austria, and Switzerland), Benelux (Belgium, Netherlands, and Luxembourg) and Nordics (Denmark, Norway, and Sweden).

Sustainability Approach and Ambitions

As the world's largest meal-kit company by revenue with a developing ready-to-eat product category, we recognize the important contribution that we can and must make in driving sustainable progress on environmental, social, and governance (ESG) issues.

Our ESG approach involves the following:

Environment:

We focus on tracking and reducing our carbon emissions, water consumption, food waste; avoiding, reducing, and innovating packaging; and sourcing ingredients responsibly.

Social:

- Own workforce: we aim to promote employee diversity, equity, and inclusion; support employee health and well-being; maintain stringent workplace safety measures; and enable employee growth and development.
- Value chain: we strive to maintain high standards of ethical trading, fair labor, and human rights in our value chain.
- Consumers and end-users: we work to provide our customers with safe, high-quality food, and with product offerings that support a healthy lifestyle, while also ensuring that their data security and ability to freely share their experience with our products and company, are maintained.

Governance:

We adhere to a comprehensive Code of Ethics, upholding our core values of integrity, respect, and responsibility.

HelloFresh Group Revenues

For details of our different revenue streams, please refer to Note 6, "Revenue", of the consolidated financial statements in the 2024 HelloFresh Group Annual Report.

HelloFresh Group Headcount

For an overview of employee headcount, please refer to "Metrics on Employee Characteristics".

Interests and Views of Stakeholders

Our stakeholder engagement strategy is designed to foster open dialogue and collaboration with a variety of actors in order to incorporate a diversity of perspectives into our business model and strategy. Our stakeholders, the purpose and methods of engagement, and examples of the corresponding outcomes are outlined in the table below. The perspectives of all of these stakeholders were, directly or indirectly, included in our 2024 double materiality assessment, described in the chapter "Management of Material Topics".

We regularly communicate the views and interests of stakeholders affected by our ESG-related material topics to our Supervisory Board via quarterly meetings of the ESG Committee.

Stakeholder Group	How Engagement is Organized	Purpose
Employees	• Employee surveys • Employee Resource Groups (ERGs) • Works Council • Whistleblowing platform • Employee development conversations • Group & local "All Hands" meetings	• Evaluate employee experience and needs • Develop actionable insights into topical issues and company culture • Ensure worker representation and fair labor practices
Consumers and end-users	• Feedback surveys • Customer support channels • Product labeling	• Monitor consumer sustainability trends • Drive product improvements
Suppliers	• Ethical Trading Policy • Supplier due diligence • Whistleblowing platform • Carbon Insetting Fund	• Monitor adherence to business conduct standards • Protect value chain workers • Decarbonize supply chain
Investors	• Capital Market Days and investor calls • Quarterly and annual reports • ESG ratings • ESG and non-ESG focused non-deal roadshows	• Understand and respond to expectations on sustainability • Inform on financial and ESG performance
Government, policy makers, and regulators	• Monitoring of regulatory updates • Initiatives with policy-makers and local governments	• Respond to new and changing regulations
Peers, academia, NGOs, and local communities	• Industry initiatives • Food research institutions • Local initiatives and partnerships	• Support industry initiatives on advancing sustainability • Drive local initiatives, including: – Food donation programs – Community fresh markets

Material Topics and their Interaction with our Strategy and Business Model

Material Topics

We identify our material disclosure topics, presented below, through a double materiality assessment (DMA). This allows us to determine the environmental-, social- and governance-related topics that are most important for the HelloFresh Group to report on for its stakeholders from a financial and impact perspective. A comprehensive DMA was conducted in 2024, following the CSRD requirements detailed in ESRS 1 - General Requirements.

In comparison to previous years, and as required by CSRD, our 2024 DMA considers (potential) positive impacts and financial opportunities next to (potential) negative impacts and financial risks.

		Material Subtopics	Description	HGB (German Commercial Code)
Identified Material Topic	**Climate Change**	Energy consumption in own operations	Within our own operations, both the potential positive contribution from investment in, and installment of, green energy sources at our facilities, as well as the potential negative impact from possible leakages of refrigerant gases, are material topics related to our Scope 1 and 2 emissions. Regarding our upstream and downstream value chain, our Scope 3 emissions as well as our outbound logistics-related emissions are particularly relevant. Our Scope 3 emissions are both significant contributors to our total GHG emissions and the most challenging for us to reduce, given that they are tied to key elements of our product offering like our ingredients, packaging, and delivery of our products to customers.	Environmental matters
		Refrigerant gases		
		Value chain emissions		
		Outbound logistics-related emissions		
	Water and Marine Resources	Water consumption in own operations	Water consumption in our direct operations (at our facilities) is driven by ice pack production, dishwashing, sanitary facilities and other operational usage. In our upstream value chain, water consumption by virgin paper packaging and ingredient suppliers, as well as potential eutrophication and potential decreases in water quality caused by improper fertilizer and plant protection product use, are material subtopics.	Environmental matters
		Water consumption and use in supply chain		
	Biodiversity and Ecosystems	Sourcing practices	Sourcing ingredients from suppliers that apply sustainable agricultural practices and/or manufacturing processes in line with national and international regulations and other certifications is an important consideration for the HelloFresh Group. Not doing so increases the possibility that our supply chain may damage existing natural resources (like soil, water, and air) and ecosystems, as well as animal populations and habitats.	Environmental matters
	Resource Use and Circular Economy	Food waste	Though our make-to-order business model allows us to have lower amounts of food waste, it is still important for the HelloFresh Group to establish solutions to minimize and divert unused food away from landfill. For example, by forming partnerships with charity organizations (such as food banks) and other partners (such as zoos), or by finding organics recycling solutions. In doing so, we can avoid emissions from waste and create positive social impact for local communities through food donations. Packaging plays a crucial role in maintaining the safety, freshness, and quality of our products. To meet growing customer expectations and prepare for increasing extended producer responsibility regulations and taxes in several of our key markets, we need to continue innovating to reduce the amount of packaging used and increase its circularity.	Environmental matters
		Packaging lifecycle management		
	Own Workforce	Diversity, equity, and inclusion	Providing a safe, inclusive, equitable, and diverse workplace for our employees, which offers them learning and career development opportunities, adequate and fair wages, and which respects and promotes human rights is key for their well-being, for their motivation and retention at our company, and for our reputation.	Employee matters; Human rights
		Employee development		
		Health and safety		
		Adequate wages		
		Human rights		

Identified Material Topic	**Workers in our Value Chain**	Diversity, equity, and inclusion	Working with suppliers which uphold the same standards as the HelloFresh Group with regards to human rights, labor practices, health and safety, promoting diversity, equity and inclusion, and providing access to clean drinking water and sanitation is an important consideration for us. Working with suppliers who do not meet these expectations could result in both a decrease in value chain worker well-being, as well as reputational damage for the HelloFresh Group.	Employee matters; Human rights
		Human rights		
		Access to water and sanitation		
	Consumers and End-users	Food safety	Food safety is a key consideration, given that all of our products are made to be consumed. Working to ensure that food safety standards and regulations are followed at suppliers' sites, at our own facilities, and in transport is important to mitigate risk, and avoid any health impacts on our customers.	Social matters
		Data security	As a company that sells all of our products via online platforms and uses web-based software for day-to-day operations, we store personal information on our customers and employees. Implementing safe and secure IT systems, and upholding regulatory standards to reduce occurrences of data security and privacy breaches is therefore important from a reputational, legal, and customer perspective. Providing customers and communities with platforms to voice their opinions is a related subtopic identified by our DMA.	
		Freedom of expression		
		Health and nutrition	Continuing to offer a healthy, convenient, affordable and time-saving meal-kit solution has been highlighted as a material subtopic. The health and nutrition element is a new opportunity to improve customer retention and adoption, as well as customer health from consuming our products.	
	Governance	Anti-corruption and anti-bribery	Anti-corruption and anti-bribery, including the prevention of insider trading, are key governance topics for the HelloFresh Group. Having strong internal prevention measures and controls are important to avoid any potential legal consequences and fees, financial losses and reputational damage that could occur.	Anti-corruption and anti-bribery

Management of Material Topics

Disclosures on our Double Materiality Assessment

Description of the Processes to Identify and Assess Material Topics

In the following subchapter, we describe our process to conduct our double materiality assessment, and identify, assess, prioritize, and monitor our material topics as described in the previous chapter.

Description of the Process

Methodologies and Assumptions

Our approach to the 2024 DMA involved a combination of literature reviews, internal topic expert interviews and workshops, and external stakeholder engagement to identify material topics. The input of topic experts allowed for the identification and assessment of potentially material impacts, risks, and opportunities, given that they have expertise on both the subject matter and our business context. We collected stakeholder insights on material topics by analyzing feedback gathered through existing channels like our [SpeakUp! platform](), Employee Resource Groups (ERGs), and through non-governmental organizations (NGOs) and supplier surveys. This enabled us to understand the HelloFresh Group's wider impact beyond our direct operations and product.

Overview of the Process to Identify, Assess, Prioritize, and Monitor Material Topics

In preparation for the CSRD, a review of the list of sustainability matters provided in ESRS 1 - General Requirements was conducted as a first step to identify potentially material Impacts, Risks and Opportunities (IROs) for the HelloFresh Group. All value chain stages, assets, activities, geographies, and brands were considered during this identification of IROs. Similarly, both direct and indirect impacts on the HelloFresh Group, on people, and on the environment from our

operations and business relationships were included. Compiling the shortened list of potentially material IROs was a critical step in the double materiality assessment process, as it enabled us to focus the materiality and prioritization assessment on topics which are most relevant to our operations, value chain, and product, and therefore most likely to be material.

The results of our previous double materiality assessments and internal risk register, as well as SASB's Materiality Finder, the Sustainable Development Goals (SDGs), MSCI's ESG Industry Materiality Map, academic studies, and feedback from internal ESG experts formed the basis of this review. Additionally, through the ENCORE database, we were able to perform a first evaluation of the potential ecosystem dependencies and impacts of different processes across our value chain, as well as possible biodiversity-related systemic, physical, and transition risks and opportunities. We aim to deepen our assessment of biodiversity- and ecosystems-related IROs and dependencies in the next two years. We did not conduct direct consultations with affected communities for the materiality assessment of water and marine resources, or biodiversity and ecosystems, instead relying on in-house experts, public databases, and academic research.

We did not use climate-related scenario analysis and thus did not identify climate-related hazards considering high emission climate scenarios, or assessed exposure of our business and activities to these hazards, and similarly did not identify transition events considering a 1.5°C scenario. However, the consultations with our carbon leads (topic experts) and reviews of our previous double materiality assessments in particular allowed us to screen the HelloFresh Group's activities and business development plans to identify and assess actual and potential future GHG emissions sources, as well as climate-related transition and physical risks and opportunities. We recognize the value of climate-related scenario analysis for providing more detailed, quantitative insights into how our activities may be impacted under different temperature futures, and thus aim to conduct a scenario analysis exercise by the end of 2026.

The IROs identified were assessed against a scale of impact or financial materiality. Positive impacts were assessed according to their scale, scope, and likelihood, while negative impacts were assessed by their likelihood and severity[2]. Financial risks and opportunities were assessed by magnitude and likelihood. Similar to the methodology used for the Group's Risk Assessment methodology as described in chapter 5 "Risk and Opportunity Report" of the Annual Report, all criteria for the IROs were scored on a scale of 1 - 5. These scores were used to calculate a final impact or financial materiality score. We applied both general quantitative thresholds as well as more specific thresholds that account for negative impacts (where severity takes precedence over likelihood), and all IROs exceeding the thresholds were considered material for the HelloFresh Group and prioritized.

Decision-making Process and Internal Control Procedures

Our collaborative decision-making process for the 2024 double materiality assessment focused on achieving consensus on the identification, assessment, and prioritization of material topics and corresponding IROs. Following the CSRD Materiality Assessment Implementation Guidance published by the European Financial Reporting Advisory Group (EFRAG), we produced a first list of potentially material topics based on the sustainability matters stated in ESRS 1, and scored the IROs identified. Internal topic experts reviewed, modified, and validated the revised list of potentially material topics as well as the scoring of material IROs. At each stage where inputs on the identification, assessment, and prioritization of IROs were collected from internal topic experts, the information was reviewed for compliance with CSRD requirements. Ultimately, the outcomes of the materiality assessment were reviewed with senior leadership. The shared decision-making structure and finalization of each step in the double materiality assessment with topic experts described above, as well as the review from senior leadership served as internal control mechanisms to support the accurate identification of material IROs, and to align the process with the requirements of the CSRD and ESRS.

Integration into Overall Risk Management Process

The HelloFresh Group has implemented a formal Risk Management System (hereafter "RMS") in order to better support business operations and ensure compliance with regulatory requirements regarding risk management. The RMS is based on the COSO framework for enterprise risk management. All of the activities, including relevant measures to identify, assess, and mitigate the HelloFresh Group's key risks, are defined in a standardized process ("Risk Management Cycle"). A comprehensive risk assessment is performed on a half-yearly basis by a dedicated risk management function at the HelloFresh Group. For more information on the methodology of this exercise, please see chapter 5 "Risk and Opportunity Report" of the Annual Report.

As our double materiality assessment was significantly revised in 2024 in order to prepare for the CSRD, the Group's 2024 risk assessment only partially integrated the double materiality methodology and identified material ESG impacts, risks and opportunities. We plan to further integrate our methodologies and outcomes in 2025.

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[2] Severity considers Scale, Scope and Irremediable Character of an impact

Monitoring for Changes and Future Revisions

In order to prepare for the CSRD, our annual double materiality assessment methodology was revised to align with the requirements set out in ESRS 1: all key steps to our process are described above.

The double materiality exercise will be reviewed on an annual basis to assess whether the outcomes of the previous year are accurate and complete, and to evaluate whether any new material topics should be added into, or removed from the assessment. A review of the methodology and process applied will also be conducted to improve our double materiality assessment year-on-year and to align with any new regulatory requirements.

Environment
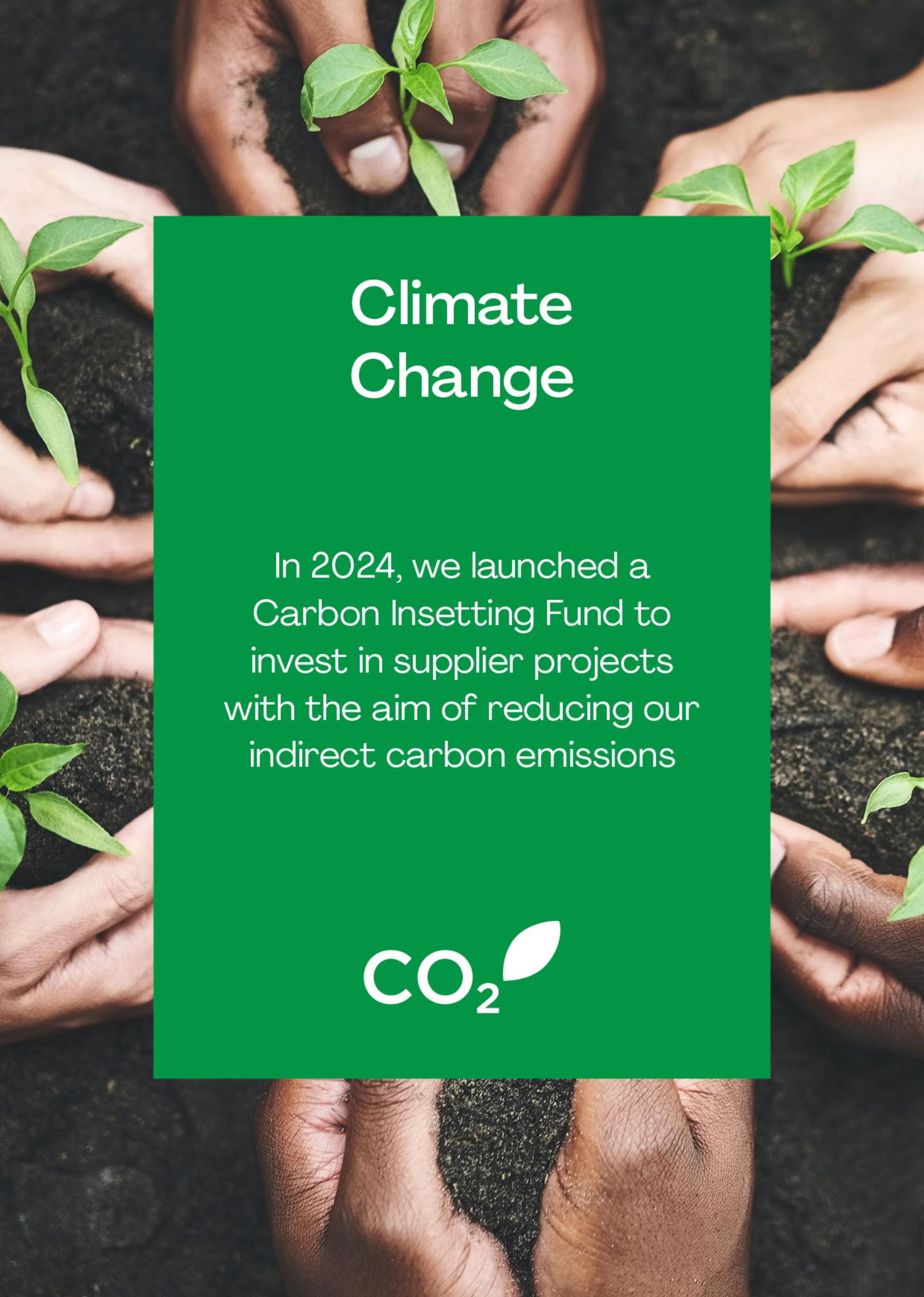
Climate Change

In 2024, we launched a Carbon Insetting Fund to invest in supplier projects with the aim of reducing our indirect carbon emissions

CO_2

Climate Change

In this chapter, we outline the HelloFresh Group's policies, actions, and targets related to climate change mitigation, and state our gross global greenhouse gas emissions. We calculate our emissions in orientation to the Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard Revised, which is considered best practice for carbon accounting. The GHG Protocol involves the measurement of company emissions on a per-scope basis:

- Scope 1: Direct emissions from energy use at sites[3] and by our vehicle fleet, and from non-recovered F-gas[4] leaks.

- Scope 2: Indirect emissions from purchased electricity and heat used at our sites, as well as electricity purchased for our owned electric fleet.

- Scope 3: Value chain and other indirect emissions not included in Scope 1 or 2.

Our Scope 1 and 2 emissions are driven by energy consumption and use of refrigerants at our facilities and logistics hubs, as well as our own delivery fleet's consumption of fuel and electricity.

Our key Scope 3 emissions sources are driven by our purchased ingredients, packaging, third-party services (warehouses and services), the upstream emissions from our consumed fuel and energy, inbound logistics (delivery of ingredients, equipment, packaging to HelloFresh Group facilities) and outbound logistics (outsourced delivery fleets), treatment of waste generated at our facilities, and the end of life treatment of our products.

Policies Related to Climate Change Mitigation and Adaptation

Energy Policy

Our Energy Policy addresses climate change mitigation, energy efficiency, and renewable energy deployment. It is applicable to all types of energy consumption, and details the specific energy criteria to be used in the selection of new equipment and energy suppliers, defines sustainable guidelines for the design of new production sites, and provides guidance for the training of staff on energy reduction measures and for sharing best practices across our markets. Our Energy Policy is implemented at our headquarters in Berlin and at our facilities in Verden (Germany), Bleiswijk (the Netherlands), and Banbury and Nuneaton (UK). Our Chief Operating Officer of Downstream Operations is accountable for its implementation. Through the implementation of the policy, we seek to improve energy efficiency, increase sourcing from green energy sources, and thus reduce our scope 1 and 2 carbon emissions.

Actions Related to Climate Change Mitigation and Adaptation

In 2024, our key climate change mitigation efforts can be organized into the following three decarbonization levers: Energy Efficiency and Green Energy, Green Deliveries, and our Insetting Fund. This subchapter is organized accordingly, with examples of local market initiatives and projects described to illustrate how the HelloFresh Group is taking action to reduce its climate change impact.

The 2024 reduction translates into a total absolute reduction of 9,401 tons of carbon dioxide equivalent (CO_2e) due to strategic measures. These consist of purchasing Renewable Energy Certificates (REC) and solar photovoltaic projects that were implemented through our own operations.

Energy Efficiency and Green Energy

Our approach to energy consumption and energy efficiency is detailed in our Energy Policy. In line with the policy, the facilities in scope as well as our global office headquarters in Berlin are ISO 50001 Energy Management System certified, and we successfully renewed the certificate for these sites in 2024.

Transitioning to renewable energy is a key measure that helps us reduce our carbon emissions. Where possible, we purchase renewable sources of electricity from our energy suppliers and generate our own electricity onsite. Several green electricity milestones were achieved in 2024. For example, our Australian HelloFresh brand, and our Canadian HelloFresh, Factor, and Chefs Plate brands' production sites switched to 100% renewable electricity in 2024 through the purchase of Renewable Energy Certificates (RECs). As in 2023, our US sites continued purchasing bundled and unbundled RECs in 2024 to cover their full electricity needs with renewable energy.

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[3] Sites over which the HelloFresh Group has operational control, as defined by the GHG protocol: where we have the authority to introduce and implement our own operating policies.
[4] F-gases are fluorinated greenhouse gases found in refrigerants.

A photovoltaic project at our site in Barleben, Germany went live in April 2024, and allows us to cover approximately 15% of its electricity needs through a power purchase agreement. This project did not result in any additional CO_2e reductions in 2024, as HelloFresh Germany already procured 100% of its electricity from green sources through renewable energy contracts with energy providers. However, utilizing solar panels in Barleben decreases our reliance on grid-supplied renewable electricity, and demonstrates our ambition and commitment to green energy.

We are continuing to investigate future projects to install solar panels and to procure renewable electricity at our sites into 2025. For example, we are setting up photovoltaic projects for our YouFoodz brand's production sites in Australia, which will contribute to an estimated reduction of 1,000 tons CO_2e. For our US and Canadian sites, we will continue to purchase RECs to cover 100% of our procured electricity.

Beyond green energy, our US market additionally contracted a third-party software provider in 2024 to support in obtaining improved visibility into refrigerant compliance and equipment status across our sites. The use of this software will support our operations in the US to improve detection of refrigerant leaks, maintain assets, and ultimately reduce Scope 1 emissions. While we are not able to quantify reductions, we expect that the investment in this software will result in earlier refrigerant leak detection, and thus reduce our refrigerant use over time and our corresponding Scope 1 emissions. This project will launch in the first quarter of 2025.

Green Deliveries

Delivery of our products from our facilities to our customers is conducted by both third-party delivery service providers, and by the HelloFresh Group's own delivery fleet, or both, depending on the market. Optimizing the routes based on the lowest fuel consumption, as well as using electric vehicles (EV) and cargo bikes powered by renewable energy (where we own the outbound logistics fleet), are among the measures that help us reduce our logistics-related carbon emissions. For example, in our Benelux, DACH, French, and US markets, we increased the share of electric vehicles in our own fleet in 2024.

In addition to e-vans, we are piloting the use of cargo bikes in the UK, Germany, Ireland, Denmark, and Sweden, through third-party delivery services.

Insetting Fund

Our 2022 Life Cycle Assessment, which analyzed the environmental footprint of our whole value chain (from field to fork) for our meal kits, determined that over half (56%) of our supply chain emissions come from our ingredients. This highlights the need for greater collaboration with and support for our suppliers to reduce the emissions associated with our food products.

Accordingly, in 2024, we launched a Carbon Insetting Fund to invest in supplier projects with the aim to reduce adverse environmental impacts, as well as carbon emissions in our supply chain. Details on the functioning of our Insetting Fund are explained below, in our subchapter "Internal Carbon Pricing". We approved funding for supplier projects including initiatives to replace soy-based cattle feed with lower-carbon alternatives; to use regenerative agriculture practices to improve soil health and reduce potential negative impacts on biodiversity; and to replace plastic packaging with compostable alternatives. We provide a detailed description of one of these projects in our "Biodiversity & Ecosystems" chapter.

Transition Plan for Climate Change Mitigation

As of 2024, the HelloFresh Group does not have a climate change mitigation transition plan in place. However, our carbon remuneration targets, which are described below in more detail, incentivize our Management Board to take actions which reduce our Scope 1 and 2 emissions. Through our life cycle assessment (LCA)[5] and a more detailed measurement of our emissions in 2024, particularly our Scope 3 emissions, we have identified that the largest opportunities to reduce emissions come from areas such as ingredients and logistics.

Our current targets have not been evaluated for compatibility with limiting global warming to 1.5°C, however throughout 2025 we are aiming to formulate a Climate Action Plan which includes emissions reduction targets that focus on emissions sources that we are able to strategically and realistically reduce across Scopes 1, 2, and 3. This builds on over a year of work quantifying the impacts of our value chain, and evaluating key opportunities for emissions reductions.

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[5] Life Cycle Assessment Technical Summary, May 2022

Targets Related to Climate Change Mitigation and Adaptation

Target Description

To drive progress towards achieving our emissions reduction targets, we follow a carbon mitigation approach which measures and prioritizes reducing our emissions. A key part of this approach involves making our operations more energy efficient and transitioning to renewable forms of energy such as solar, wind, and hydropower.

We had two GHG emission reduction targets active in 2024:

- By 2025: Reduce Scope 1 and 2 carbon emissions by 66% per euro of revenue from our meal-kit production facilities where the HelloFresh Group has operational control[6], from a 2019 baseline[7].

- By 2025: Reduce Scope 1 and 2 carbon emissions by 30% per euro of revenue in our other businesses' production facilities where the HelloFresh Group has operational control, from a 2021 baseline[7].

Both targets include Scope 1 and 2 emissions related to electricity, natural gas, fuels, and refrigerant gas at our facilities. For the decarbonization levers and actions that we have taken in 2024 to progress towards our targets, please refer to the subchapter "Actions Related to Climate Change Mitigation and Adaptation", specifically the "Energy Efficiency and Green Energy" and "Green Deliveries" actions. Our emissions goals are set on an intensity basis of grams of CO_2e per euro of revenue to account for the rapid growth that the HelloFresh Group has experienced over the last few years.

Target-setting Methodology and Calculations

The carbon reduction targets above, along with our food waste targets described in our "Resource Use and Circular Economy" chapter, are compensation-linked, and thus influence the variable compensation components of our Management Board. As they are intensity-based targets, the total tons of Scope 1 and 2 CO_2e emissions from facilities over which we have operational control are normalized relative to our revenue. The targets were established voluntarily; they are not mandated by legislation.

The emissions targets were set using two metrics: total Scope 1 and 2 emissions in tons of CO_2e (numerator) and total revenue (in euros) for the base year (denominator). When our first target was set in 2019, we only had meal-kit businesses. Our second target was set in 2021 following the acquisition of Factor 75 (now: Factor) and other brands, which expanded our product categories.

Given that our current targets cover Scope 1 and 2 emissions from facilities over which we have operational control, they are not consistent with our GHG inventory boundary which also includes Scope 3. Target progress is calculated on a quarterly basis by totaling the Scope 1 and 2 emissions, and dividing them by the corresponding quarter's revenue forecasts.

Our third-party operated facilities for GoodChop, The Pets Table, Factor Benelux, and Factor Nordics brands, as well as our BeCool subsidiary, and third-party operated meal-kit facilities in Italy, Spain, Ireland, and Switzerland, are excluded from the target calculation, as we do not have operational control over these sites[8].

Tracking Target Progress and Relevant Performance Trends

HelloFresh Group Production Facilities Emissions on a per Euro of Revenue Basis	2024	2023	2022
Meal-kit business			
Global production facilities managed by HelloFresh, Scope 1 & 2	1.27 g	2.14 g	3.06 g
Other businesses			
Global production facilities managed by HelloFresh, Scope 1 & 2	7.63 g	10.36 g	10-16 g[1]
Total meal-kit and other businesses			
Global production facilities managed by HelloFresh, Scope 1 & 2	3.00 g	3.72 g	4.19 g

HelloFresh Facilities emissions from: Electricity, natural gas, fuels, and F-gas.
[1] Out of the external assurance scope. A range is provided because of the lack of historical data and its accuracy as we acquired various businesses over the years, which had immature systems in place for tracking and reporting sustainability data.

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[6] Sites over which the HelloFresh Group has operational control, as defined by the GHG protocol: where we have the authority to introduce and implement our own operating policies.
[7] Years 2019 and 2021 are out of the external assurance scope.
[8] These facilities will be referred to as "third-party facilities" from this point onwards.

Carbon Emissions in own Operated Meal-kit Production Facilities per Euro of Revenue[1]

Baseline 2019

-79% CO_2e

2019[2]	2020[2]	2021	2022	2023	2024
6.08 g	2.99 g	2.59 g	3.06 g	2.14 g	1.27 g
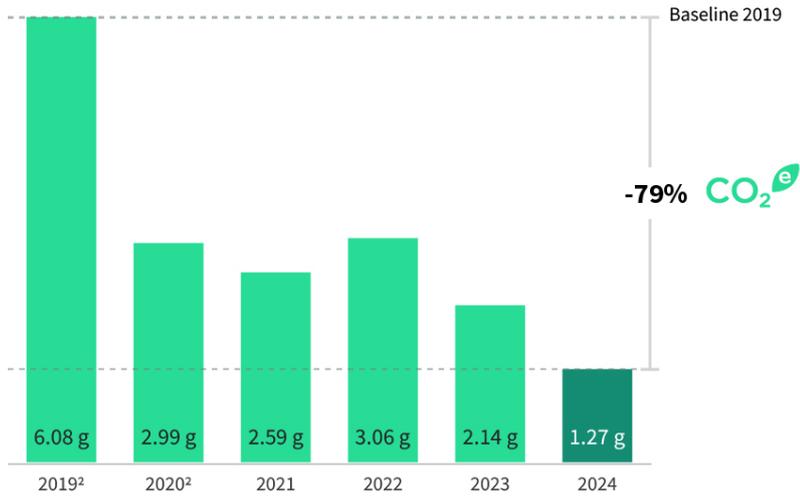
[1] Includes: energy, fuels and leakages of F-gases at our distribution centers
[2] The 2019 baseline and 2020 amount are out of the external assurance scope

Carbon Emissions in own Operated Ready-to-eat and Other Businesses' Production Facilities per Euro of Revenue[1]

Baseline 2021, upper bound

-62% CO_2e

	2021[2]	2022[2]	2023	2024
Range	20 g (10 g)	16 g (6 g)		
	10 g	10 g	10.36 g	7.63 g

Range because of lack of historical data availability and accuracy since newly acquired and built businesses with immature sustainability data tracking and reporting.
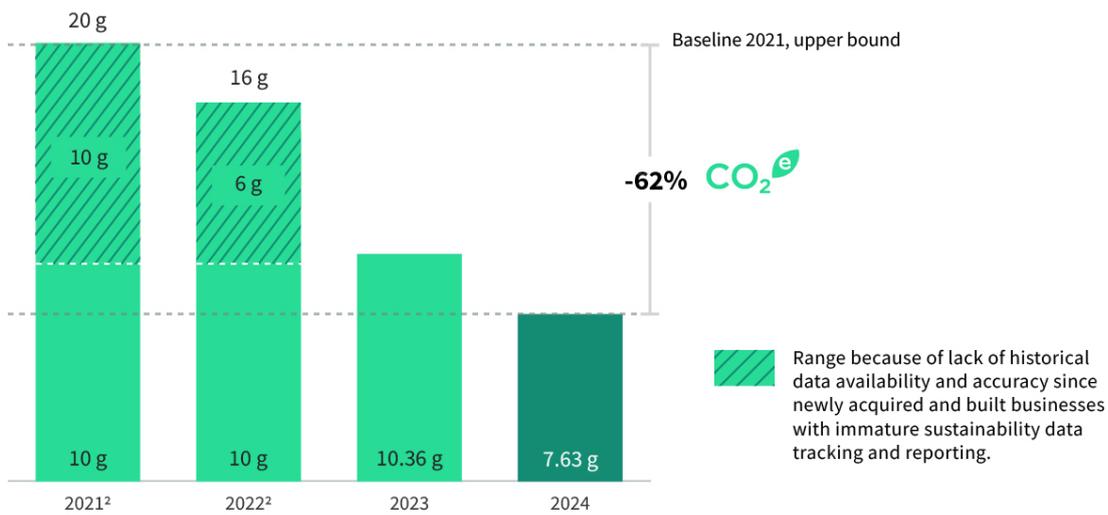
[1] Includes: energy, fuels and leakages of F-gases at our distribution centers
[2] Out of the external assurance scope

Energy Consumption and Mix

Detailed Breakdown of Energy Consumption

Energy Consumption From Non-renewable Sources

in Megawatt hours (MWh)	2024
Fuel consumption from coal and coal products	0.0
Fuel consumption from crude oil and petroleum products	349,857.8
Fuel consumption from natural gas	67,939.3
Fuel consumption from other fossil sources	0.0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	12,824.0
Total fossil energy consumption	**430,621.0**
Share of fossil sources in total energy consumption (in %)	74.1%
Consumption from nuclear sources	**212.3**
Share of consumption from nuclear sources in total energy consumption (in %)	0.0%

Energy Consumption From Renewable Sources

in Megawatt hours (MWh)	2024
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	7.0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	147,978.4
The consumption of self-generated non-fuel renewable energy	2,688.8
Total renewable energy consumption	**150,674.2**
Share of renewable sources in total energy consumption (in %)	25.9%
Total energy consumption	**581,507.5**

Methodology, Assumptions, and Calculations

The values presented above represent the electricity, natural gas, and fuel consumption of the HelloFresh Group's owned delivery fleet and the HelloFresh Group's facilities over which we have operational control[9].

Data on energy and fuel consumption is collected, where possible, from primary data sources, such as invoices. Where primary consumption data is not available for our facilities, estimates based on historical consumption values, or on facilities with similar functions, are used. For our owned delivery fleet (outbound logistics), where primary fuel consumption is unavailable, estimates are based on box count or on prior consumption values.

Energy Intensity based on Net Revenue

in Megawatt hours (MWh) / MEUR	2024
Energy intensity from activities in high climate impact sectors	75.9

Financial Reconciliation

in MEUR	2024
Net revenue used to calculate GHG intensity	7,661.3
Net revenue (other)	0.0
Total net revenue (as in Annual Report)	**7,661.3**

Methodology, Assumptions, and Calculations

Based on our assessment of the high climate impact sectors listed in NACE Sections A to H and Section L, as defined in Commission Delegated Regulation (EU) 2022/1288, we conclude that all of the HelloFresh Group's revenue-generating activities are classed as high climate impact sectors. To calculate the metric above, we therefore divide our total energy consumption by the HelloFresh Group's total net revenue. For the methodology and assumptions used to calculate total energy consumption, please see the text under "Methodology, Assumptions and Calculations" above.

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[9] Third-party operated facilities, stated here, are not included in the electricity consumption figures presented above. Though their electricity and fuel consumption is not accounted for here, this is included in Scope 3, Category 1.c. as we consider it as part of our operational expenditure.

Gross Scopes 1, 2, 3 and Total GHG Emissions

in Metric tons of CO_2 equivalents (tCO_2e)	2024
Scope 1 GHG Emissions	
Gross scope 1 GHG emissions	60,624.4
Percentage of Scope 1 GHG emissions from regulated emissions trading schemes (%)	—%
Scope 2 GHG Emissions	
Gross location-based scope 2 GHG emissions	56,736.0
Gross market-based Scope 2 GHG emissions	11,036.4
Significant Scope 3 GHG Emissions	
Total gross indirect (Scope 3) GHG emissions	2,728,852.1
1 Purchased Goods and Services	**2,375,323.0**
Purchased Ingredients	2,097,782.7
Purchased Packaging	63,758.3
Other Purchased Goods and Services	213,782.0
2 Capital Goods[1]	—
3 Fuel and Energy-Related Activities (Not Included in Scope1 or Scope 2)	49,929.8
4 Upstream Transportation and Distribution	**237,163.1**
Inbound	162,479.3
Outbound	74,683.9
5 Waste Generated in Operations	3,566.8
6 Business Travel[1]	—
7 Employee Commuting[1]	—
11 Use of Sold Products[1]	—
12 End-of-Life Treatment of Sold Products	62,869.4
Total GHG Emissions	
Total GHG emissions (location-based)	**2,846,212.5**
Total GHG emissions (market-based)	**2,800,513.0**

[1] These scope 3 categories are not included within the HelloFresh Group's reporting boundary.

Methodology, Assumptions, and Calculations

We apply the operational control approach to calculate our GHG emissions: we include 100% of the emissions from operations over which we, or one of our subsidiaries, have operational control.

In accordance with ISO 140604 and the GHG Protocol, we apply the principles of relevance, completeness, consistency, accuracy, and transparency for our GHG emissions reporting. Our Scope 1 and 2 emissions include at least 90% of our operations, and no less than 95% of our estimated carbon emissions. Across Scopes 1-3, we select emission factors most accurate and relevant to the HelloFresh Group's specific context. Please see [Appendix 1](#) for the list of emissions factors used.

We separate our disclosure below by Scope, given that the methodologies and assumptions applied to calculate the figures, and the nature of the emissions sources, vary.

Scope 1

We define Scope 1 emissions as those from energy sources owned or controlled by the HelloFresh Group. Our Scope 1 emissions originate from:

- Natural gas consumption for heating, hot water generation, or cooking for our ready-to-eat product category[10]

- Leakages of F-gases used in air-conditioning and refrigeration units[10]

- Other on-site fuel combustion, for example from generators or fuel-operated boilers[10]

- Fuel combustion by our owned outbound delivery fleet

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[10] Natural gas, F-gas leakages and other on-site fuel combustion from our [third-party facilities](#) are included in Scope 3, Category 1.c.

Where possible for our facilities' Scope 1 emissions, we collect data from utility bills. Where this is not possible, we apply the same estimation approach as described in "Methodology, Assumptions, and Calculations" for our detailed breakdown of energy consumption. For fuels consumed by our owned outbound delivery fleet, we calculate CO_2e emissions using liters of fuel consumed multiplied by the specific fuel type's conversion factor. Alternatively, if total fuel consumed is not available, we estimate using the tons of freight transported, total distance travelled, and an appropriate CO_2e per ton-km conversion factor. For markets where data availability is further limited, we estimate by production volume (box count) and the outbound delivery emissions of a similar market as a proxy.

Scope 2

Both our location-based and market-based Scope 2 emissions are presented in the table above. The location-based method reflects the average emissions intensity of the grids from which our facilities consume energy. For our emission factors, please see Appendix 1. We update these on an annual basis.

The market-based method allows us to demonstrate the emissions from electricity that we have purposefully contracted, and thus also reflects our renewable energy purchasing decisions. We calculate our market-based emissions using emission factors per type of electricity and heat purchased. Our purchased electricity and heat consumption data is collected and calculated following the methodology described in "Methodology, Assumptions, and Calculations".

Sources of our Scope 2 emissions are:

- Electricity consumption in our facilities, logistics hubs, and offices[11]

- Purchased heat at our facilities, logistics hubs, and offices

- Electricity consumption for our owned electric vehicle fleet, here charging occurs outside of our facilities

Scope 3

Following GHG Protocol recommendations, we assess all Scope 3 emissions categories to develop a comprehensive understanding of the HelloFresh Group's carbon footprint and identify those categories relevant for our carbon reporting. We reassess the relevancy of all Scope 3 categories at least annually to maintain alignment of our GHG inventory in the context of our active brands and operations.

For the 2024 reporting year, we have identified and included five relevant Scope 3 categories: Purchased Goods and Services, Fuel- and Energy-related Activities, Upstream Transportation and Distribution, Waste Generated in Operations, and End-of-Life Treatment of Sold Products.

Scope 3, Category 1 - Purchased Goods and Services: includes the emissions from the extraction, production of our ingredients, packaging (primary and secondary), and other purchased goods and services. These are included as subcategories in the table above, and comprise the following:

1.a. *Ingredients:* products such as grains, spices, baked goods, fruit, vegetables, dairy, proteins (beef, pork, chicken, fish), and processed ingredients (canned goods, prepared meals, and desserts). It includes the cradle-to-gate emissions of producing these ingredients; from their point of origin (on-farm) to delivery to our suppliers. To calculate these emissions, we multiply the actual purchased ingredient quantities with their associated emission factors (ISO 14067 certified by Carbon Trust), sourced from our partner HowGood[12]. Emissions generated post-delivery to our suppliers are not included in this category.

1.b *Packaging:* we include cradle-to-gate emissions for primary and secondary packaging purchased. Tertiary packaging[13] is currently excluded due to limited materiality to our overall footprint and product emissions. Similar to our ingredients, we multiply the actual purchased packaging quantities with emissions factors for each material type to calculate emissions.

1.c. *Other purchased goods and services:* all external products and services procured to support our operations, for example labor costs, leased spaces, clothing, maintenance services, and IT products. To estimate these emissions, we apply a spend-based method and allocate emissions factors per category.

Scope 3, Category 3 - Fuel- and Energy-related Activities: includes upstream emissions associated with the extraction, production, and transportation of fuel and energy. To calculate these emissions, we apply emissions factors to our primary electricity, natural gas, and fuel consumption data.

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[11] Electricity consumption from our third-party facilities are included Scope 3, Category 1.c.
[12] HowGood is an independent research company with the world's largest database on product sustainability.
[13] Primary packaging: refers to materials used for the direct containment of ingredients.
   Secondary packaging: items used to deliver the product to the consumer.
   Tertiary packaging: materials used during storage and transportation, and which do not reach our customers.

Scope 3, Category 4 - Upstream Transportation and Distribution: includes the third-party transportation and distribution services purchased in the reporting year, including both inbound and outbound logistics. This category is split accordingly:

4.a. *Inbound:* transportation of goods and raw materials from suppliers to our facilities, including third-party transfers for ingredients and packaging purchased. All others types of inbound transportation are excluded. The approach taken for inbound emissions is to calculate the ton-km, and apply corresponding emission factors. For smaller brands and markets where the data is not available, estimations using values from markets or brands of similar size are calculated.

4.b. *Outbound:* delivery of sold products to customers that is outsourced to third-party carriers. We classify these deliveries as upstream as we are responsible for selecting the carrier and deciding key shipping details, and directly compensate logistics parties. To calculate these emissions, the distance-based method and third-party carrier data are used.

Scope 3, Category 5 - Waste Generated in Operations: emissions from the disposal and treatment of waste from our facilities by third-party providers. To ensure consistency within our combined non-financial report, we align the scope of waste included for our carbon calculations with the values reported in the "Resource Use and Circular Economy" chapter. As of 2024, we therefore limit this category to the emissions generated from the treatment of food waste produced at our facilities. The calculation approach for this category consists of multiplying the weight of the waste by the disposal method's emission factor.

Scope 3, Category 12 - End-of-Life Treatment of Sold Products: includes the emissions from the disposal and treatment of our products sold to customers. We include the total expected end-of-life emissions from all products sold in the 2024 reporting year. We calculate this category's emissions by multiplying the HelloFresh Group-specific emission factor developed in our LCA study with the number of meals sold in the reporting year.

Though we have emissions from categories Capital Goods, Business Travel, Employee Commuting, and Use of Sold Products, we exclude them from our reporting boundary for the 2024 reporting year, as they either have a limited contribution to our overall GHG emissions impact, or HelloFresh has limited potential to influence or reduce the associated emissions. Categories Upstream Leased Assets, Downstream Leased Assets, Processing of Sold Products, Franchises, and Investments are assessed as not relevant (thus excluded), given that we do not have any emissions related to our products, suppliers, or services that would fall under this category.

GHG Intensity per Net Revenue

in tCO$_2$e / MEUR	2024
Total GHG emissions (location-based) per net revenue	371.5
Total GHG emissions (market-based) per net revenue	365.5

Turnover is defined as net turnover applying IFRS (IAS 1 Paragraph 82(a)) and is disclosed as Group Revenue in Note 6, "Revenue", of the consolidated financial statements in the 2024 HelloFresh Group Annual Report, for a total consideration of MEUR 7,661.3 for the financial year 2024.

in tCO$_2$e / MEUR	2024
Net revenue used to calculate GHG intensity	7,661.3
Net revenue (other)	0.0
Total net revenue (as in Annual Report)	**7,661.3**

Total GHG emissions (location-based) and Total GHG emissions (market-based) are listed in the table on page 20.

Internal Carbon Pricing

Description of our Insetting Fund

As described under the heading "Actions Related to Climate Change Mitigation", in 2024 the HelloFresh Group launched an Insetting Fund: our internal carbon fund to finance supplier projects that support the decarbonization of our supply chain.

An annual budget is allocated for the Insetting Fund, with the highest emitting departments in our International segment contributing a fixed amount according to their climate impact. The Insetting Fund thus acts as an

accountability mechanism, similar to an internal fee: high-emitting functions are required to contribute to the financing pool in order to reduce the climate impact of our supply chain.

As of 2024, the Insetting Fund is focused solely on suppliers of ingredients, given that the emissions from agricultural production make up the majority of our products' climate change impact (for example, 56% of our meal kits' carbon impact)[14]. The first six projects approved for financing in 2024 vary in terms of geography and ingredient type, and are only from suppliers of our meal-kit brands. We aim to expand the scope of the Insetting Fund to suppliers of our ready-to-eat and other product categories in future as their associated brands mature.

Internal Carbon Price Details

Though we allocate a Group-wide budget for the implementation of a diverse set of supplier projects, we do not apply a formal carbon price to help inform decision-making processes in this first iteration of the Insetting Fund. The contribution of each entity to the Fund is agreed based on a budgeted total investment amount, rather than on a carbon-linked price. As the Insetting Fund project matures, and as we gain experience in insetting, we will continue to evaluate establishing more formal carbon pricing mechanisms.

GHG Removals and GHG Mitigation Projects Financed through Carbon Credits

GHG Removals and Storage

As of 2024, the HelloFresh Group does not finance any GHG removals or storage through carbon credits.

Carbon Credits Outside the Value Chain

Carbon credits retired in 2024, or that we plan to retire in future, are purchased as part of our engagement with customers on climate change. Credits purchased in metric tons CO_2e are presented in the table below.

in Metric tons of CO_2 equivalents (tCO_2e)	2024
Total amount of carbon credits outside value chain that are verified against recognized quality standards and cancelled	131,171.0
Total amount of carbon credits outside value chain planned to be cancelled in future	43,483.0

Purchased offsets are not included in the calculations of our GHG emissions for the reporting year, nor in the achievement of our targets. All of our offset credits are Gold Standard[15], Verified Carbon Standard or ISO 14064-3 certified.

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[14] HelloFresh LCA study.
[15] Gold Standard is an international offset program administered by the Gold Standard Foundation. Verified Carbon Standard is an offset certification program managed by Verra.

Water & Marine Resources

We formalized and conducted a comprehensive review of our water consumption data collection processes and figures in 2024

Water and Marine Resources

2024 is the first year that the topic of Water and Marine Resources has been assessed as material for the HelloFresh Group's direct operations and upstream supply chain.

Water consumption in our direct operations is generally driven by ice pack production, cooling, dishwashing, sanitary facilities, and other operational usage. Through our upstream supply chain, we also have potential indirect impacts on water and marine resources. In particular, our DMA emphasized that agricultural and virgin paper packaging production are water-intensive. Additionally, should improper use of fertilizer, pesticides, herbicides, or fungicides occur during agricultural production of food products that we procure, it could lead to eutrophication and decreases in water quality.

In this chapter, we report on our policies, plans, and actions to address this material topic, as well as provide our total water consumption for the 2024 reporting year.

Policies Related to Water and Marine Resources

Here we describe the policies, where applicable, adopted to manage water and marine resources in our direct operations and our upstream supply chain.

Direct Operations

As this is the first year that water has been evaluated as a material topic for the HelloFresh Group, and also the first year that we have preliminarily assessed all of our locations for exposure to water stress, we did not have a group-wide water-related policy for our own operations in 2024. Currently, each site is responsible for its own water management, with monthly reporting (using utilities invoices, metering) and tracking by the local Sustainability Manager. 27 (or 52%) of our sites are located in areas of high water stress, as evaluated by the Aqueduct Water Risk Atlas.

Supply Chain

Sustainable Sourcing Policy for our International Segment

Our Sustainable Sourcing Policy for our International segment (please see the subchapter "Policies Related to Biodiversity and Ecosystems" for details on policy scope and accountability) helps us manage our upstream, supply chain-related potential material impacts. In the policy, we formalize our support for the procurement of recycled paper for our product packaging as an alternative to more water-intensive virgin paper, and set requirements on supplier pesticide use.

In this way, we are tackling the supply chain drivers of our potential negative impacts. Additionally, we include requirements for direct suppliers to obtain a Global Food Safety Initiative (GFSI)[16], Global Good Agricultural Practices (GLOBALG.A.P.) or equivalent certification for fresh produce to demonstrate the application of good agriculture practices and support improved traceability. Suppliers with GFSI or GLOBALG.A.P. certification are therefore less likely to pollute local water bodies and contribute to coastal and/or inland eutrophication through their activities. Similarly, our Sustainable Sourcing Policy includes requirements for suppliers of fish products to obtain Aquaculture Stewardship Council (ASC) certification. Under ASC certification requirements, fish farms located in water bodies at risk of eutrophication need to establish Area Management Agreements and measure nutrient levels in their waters. If trophic levels increase, farms need to assess the contribution of their aquaculture activities to nutrient inputs and apply corrective measures[17]. Therefore, requiring ASC certification from fish product suppliers helps the HelloFresh Group manage marine resource use in our supply chain.

A Sustainable Sourcing Policy for our North American segment is currently under way, and we aim for it to be implemented in 2025. This policy will be based on similar principles and requirements as our International segment's Sustainable Sourcing Policy, while also addressing the US and Canada's market-specific needs.

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[16] Standards like GFSI primarily focus on food safety, however indirectly support sustainable sourcing by requiring traceability, responsible use of inputs, and supplier accountability. While these standards do not explicitly target sustainability, biodiversity, or water-related impacts, they mitigate risks of these occurring by enforcing higher operational standards than basic regulatory requirements.
[17] For more details on eutrophication and the ASC requirements for Area Management Agreements to help prevent eutrophication, please see: https://asc-aqua.org/new-standards-programme-improvements/water-quality/

Sustainable Oceans and Seas

Our Sustainable Sourcing Policy for our International segment includes requirements for fish and seafood. For example, aquaculture suppliers need to obtain and maintain either a GLOBALG.A.P. or ASC certification (as detailed above), or Best Aquaculture Practices (BAP) (two stars and above) for products supplied to the HelloFresh Group.

As explained above, a similar policy for our North American segment is currently underway and will be implemented in 2025. Similar to our International segment, fish and seafood product suppliers are also assessed for certification status. Additionally, our US market partners with the Monterey Bay Aquarium Seafood Watch program, which provides a detailed assessment and rating of seafood sustainability going beyond certification.

Actions Related to Water and Marine Resources

Direct Operations

Given that 2024 was the first year that water and marine resources was assessed to be a material topic for the HelloFresh Group, our actions have been focused on understanding and measuring our water-related consumption in our direct operations. In 2024, we formalized and conducted a comprehensive review of our water consumption data collection processes and figures. We also conducted the first global assessment of facility exposure to water risk using Aqueduct's Global Water Risk Atlas (WRI)[18].

Establishing these processes to better assess our impact on water and marine resources is a key milestone for the HelloFresh Group: it sets a precedent for future impact monitoring, and the data insights gained will be useful in informing future actions to avoid and reduce our use of water and marine resources, for example through efficiency projects at our facilities.

Supply Chain

We addressed our material water-related supply chain impacts in 2024 by applying our International segment's Sustainable Sourcing policy, in particular the assessment of suppliers holding third-party sourcing certifications such as GLOBALG.A.P. and ASC. These actions are described in the subchapter "Actions Related to Biodiversity and Ecosystems", and progress against corresponding metrics is detailed in "Impact Metrics Related to Biodiversity and Ecosystems". Though we recognize that monitoring and taking action on supply chain water impacts through certifications has its limitations, it is challenging to directly influence and track water and marine resource use in our value chain. We will continue to monitor and assess appropriate metrics and actions to take in the coming years as our suppliers produce their own sustainability statements as a result of increasing corporate ESG reporting regulations and expectations.

Metrics and Targets

Targets Related to Water and Marine Resources

As of 2024, the HelloFresh Group does not have any water- or marine resources-related targets, as this is the first year that water and marine resources was found to be a material topic. However, water consumption at our sites is tracked on a monthly basis, and reported to our sustainability and carbon managers in our International and North American segments respectively.

Regarding our potential supply chain impacts, we monitor supplier compliance with our requirements on GLOBALG.A.P., MSC, ASC, and/or BAP certification in line with our objectives for sustainable sourcing and our Sustainable Sourcing Policy for our International segment. The certification metrics are global in scope, covering both our International and North American segment. Our performance against these metrics can be observed below. These indicators relate to the material subtopic on supply chain-related water impacts, as they demonstrate that we are engaging with and assessing our suppliers' practices, and thus addressing the supply chain drivers of potential negative impacts.

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[18] For the Aqueduct Water Risk Atlas, please see the following webpage.

Water Consumption

Water consumption in our own operations is mainly driven by ice pack production, cooling, sanitary facilities (washrooms), and, for the ready-to-eat segment, cleaning equipment after use in cooking and preparing meals.

Opportunities for water recycling and re-use in these processes are limited within our own operations due to food safety and quality requirements; it would require water treatment to a food quality grade that is more effectively performed by regional treatment works that can do this at scale. Additionally, any recycling or re-use of water used in cleaning food production and preparation equipment introduces pathogen vectors within our processes, which our Food Safety and Quality Assurance (FSQA) teams work to remove as part of their risk-based approach to food safety. Consequently, our actions are rather targeted at reducing our overall water consumption instead of increasing the total water recycled and reused.

As of 2024, water storage at our facilities is limited to sprinkler systems and minimal storage of ice packs in a few markets where we use water-based ice packs. Given that we have very few operational processes which involve water storage, we assess water storage and its related metrics as not significant for the HelloFresh Group.

Water Consumption Data for Own Operations

in m^3	2024
Total water consumption	**671,579**
Water consumption in areas at water risk[1]	541,326

[1] We assessed areas at water risk using the WRI Aqueduct Water Risk Atlas tool

Data on water consumption is compiled using invoices or other communications from utility providers, meter readings, and, where primary data was unavailable, estimations. Estimation methods include calculating approximate water consumption based on previous meter readings for a facility (where available), production volumes, or size of the facility.

Biodiversity & Ecosystems

Our sustainable sourcing strategy is crucial in our journey to redefine the future of food

Biodiversity and Ecosystems

As identified by our DMA, our material subtopics on biodiversity originate from our upstream supply chain: the agricultural and/or manufacturing practices of our ingredients suppliers. Our direct activities, like assembling meal kits and preparing ready-to-eat meals, have a relatively low impact in terms of biodiversity and ecosystem resource use, and do not lead to the deterioration of natural habitats and the habitats of species. We therefore approach reporting on biodiversity and ecosystems purely from an upstream value chain perspective.

Biodiversity and its subtopics across our own operations and value chain is an area that will require continuous monitoring and evaluation in the annual updates of our Group-wide DMA. As a result of increasing corporate ESG reporting regulations and expectations, we expect that many of our suppliers will either publish their own detailed information on their material impacts on biodiversity, or will be requested to provide data on these impacts by multiple customers. This increased transparency will improve our understanding of biodiversity and ecosystems-related risks, dependencies, impacts, and opportunities for the HelloFresh Group.

Biodiversity Transition Plan and Consideration of Biodiversity and Ecosystems in Our Strategy and Business Model

Resilience to Biodiversity- and Ecosystems-Related Shocks

Though we have not conducted a formal resilience analysis as of 2024, and thus cannot provide information on the methodology used such as the assumptions and time horizons applied, and involvement of stakeholders, we do qualitatively assess the resilience of our strategy and business model with regards to biodiversity- and ecosystems-related risks and shocks. Our unique business model and agile make-to-order operations allow us to effectively manage a shorter supply chain, as they require us to hold direct relationships with our suppliers and to have regular discussions on expected order volumes. This allows us to anticipate any potential shortages of supply resulting from biodiversity- and ecosystem-related risks and shocks weeks in advance, and to develop adaptation strategies accordingly. For further information on our strategy and business model, please see chapter 1 "Fundamentals of the Group" of the Annual Report.

Several strategic decisions were taken in 2024 to adapt our business model and strategy to address our potential impact on biodiversity and ecosystems. For example, we integrated a Sustainable Sourcing Policy into our procurement processes for our International segment, demonstrating that we are adapting our purchasing strategy and thus beginning to tackle our indirect biodiversity- and ecosystems-related impacts. Additionally, we monitor supplier adherence on key sustainable sourcing metrics, as detailed in the subchapter "Impact Metrics Related to Biodiversity and Ecosystems Change". We also support suppliers in developing initiatives to increase their resilience against biodiversity and ecosystem risks through our Insetting Fund. For example, as described on page 31, we are supporting a supplier of fresh herbs in its transition to regenerative agriculture. This project is a crucial first step in increasing the supply resilience of key ingredients to biodiversity- and ecosystem-related risks, as well as reducing the biodiversity impacts of our supply chain.

Policies Related to Biodiversity and Ecosystems

Sustainable Sourcing Policy for our International Segment

Our International segment's Sustainable Sourcing Policy is relevant to our material biodiversity- and ecosystem-related impacts for our upstream supply chain. The scope of this policy is our supply chain for the HelloFresh, Green Chef, and EveryPlate brands in the following markets: Australia, Austria, Belgium, Denmark, France, Germany, Ireland, Italy, Luxembourg, Netherlands, New Zealand, Norway, Spain, Sweden, Switzerland, and the United Kingdom. Ultimate accountability for the implementation of the policy lies with our Leadership team, and in particular our Chief Operating Officer for Upstream Operations.

Our Sustainable Sourcing Policy for our International segment addresses several of the direct impact drivers of biodiversity loss, including land-use, freshwater-use, and sea-use change, impacts on the state of species and on the extent and condition of ecosystems as well as direct exploitation and pollution, by setting expectations and requirements for our suppliers with regards to sustainable practices. For example, we include requirements for direct

suppliers to obtain a GFSI[19], GLOBALG.A.P. or equivalent certification for fresh produce to demonstrate the application of good agriculture practices and support improved traceability. For suppliers that are distributors, and thus not involved in the agricultural processes, these certifications do not always reach the farm-level, however indirectly support sustainable sourcing by requiring traceability, responsible use of inputs, and supplier accountability. Similarly, aquaculture product suppliers are required hold and maintain either Aquaculture Stewardship Council (ASC), Best Aquaculture Practices (BAP) 2 stars and above, or GLOBALG.A.P. certification. We request suppliers of wild-caught fisheries products to have and maintain Marine Stewardship Council (MSC) certification, and are not onboarding any new products without MSC certification. Supplier compliance with these requirements is disclosed in the subchapter "Impact Metrics Related to Biodiversity and Ecosystems Change". As of 2024, the policy does not address the social consequences of biodiversity and ecosystems-related impact, climate change, invasive alien species, or the HelloFresh Group's dependencies on ecosystem services.

With regards to deforestation, we aim to source ingredients that do not contribute to deforestation or habitat destruction and are working towards compliance with the European Union Deforestation Regulation (EUDR) as stated in our International segment's Sustainable Sourcing Policy. In the policy, we describe expectations for suppliers of select key products and commodities associated with deforestation, like soy, palm oil, and paper packaging. For example, our suppliers of ingredients that contain palm oil are required to ensure their suppliers are Roundtable on Sustainable Palm Oil (RSPO) certified (Supply Chain and Mass Balance models). In line with the EUDR, we have conducted a risk assessment on our suppliers, and are working on developing a sourcing framework for our European markets that adheres to no-deforestation criteria.

A Sustainable Sourcing Policy for our North American segment is currently underway, and we aim for it to be implemented in 2025. This policy will be based on similar principles and requirements as our International segment's Sustainable Sourcing Policy, while also addressing the US and Canada's market-specific needs.

Actions Related to Biodiversity and Ecosystems

The way that we source our ingredients and products influences both upstream and downstream sides of our value chain, and as a result plays a key role in building a sustainable and scalable food system. Our sustainable sourcing strategy is therefore a crucial component of our journey to redefine the future of food and tackle our supply chain's biodiversity impacts.

As of 2024, we do not use biodiversity offsets in our action plans, nor do we incorporate local and indigenous knowledge into our biodiversity- and ecosystems related actions. As illustrated by the application of regenerative agriculture practices by our supplier Herrmann Kräuter with the support of our Insetting Fund, we are integrating nature-based solutions into our actions.

Assuring Sustainable Sourcing through Recognized Standards and Certifications

We tackle our potential biodiversity-related impacts by requiring suppliers of both our International and North American segments, for certain ingredient classes, to obtain third-party certifications which demonstrate good traceability, food safety, and/or good agricultural, aquaculture, and fishing practices. For example, our Food Safety & Quality Assurance (FSQA) teams evaluate annually whether fresh produce suppliers have a GFSI, GLOBALG.A.P. or equivalent certification, whether our suppliers of aquaculture products are certified by ASC, BAP (for BAP we evaluate for 2 stars and above), or GLOBALG.A.P., and whether suppliers of wild-caught fish/fish products are MSC certified as part of the tendering and supplier approval process. Where suppliers with these certifications are available and viable options for our International segment's markets, we implement this as a supplier requirement as stated in our Sustainable Sourcing Policy for our International segment.

For fish and seafood products in our North American segment, suppliers are similarly assessed for certification status. Our US market additionally has a partnership with the Monterey Bay Aquarium (MBA) Seafood Watch program, which provides a detailed assessment and rating of seafood sustainability going beyond certification; we work to have all fish and seafood products for our US market ranked as Seafood Watch Best Choice, Good Alternative, or Certified.

Assessing and tracking compliance with these requirements is key to implementing our Supplier Approval Policy and Sustainable Sourcing Policy for our International segment. The exact biodiversity impact of suppliers complying with the certification requirement is challenging to quantify, however we do track our progress on compliance, as can be observed below.

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[19] Standards like GFSI primarily focus on food safety, however indirectly support sustainable sourcing by requiring traceability, responsible use of inputs, and supplier accountability. While these standards do not explicitly target sustainability or biodiversity, they mitigate risks by enforcing higher operational standards than basic regulatory requirements. Suppliers compliant with GFSI are less likely to engage in unsustainable practices, as the focus on compliance and accountability reduces the likelihood of harmful impacts.

Our supplier for fresh herbs for the DACH, Benelux, Nordics, Irish, and French market, Herrmann Kräuter, is trialing and implementing regenerative agriculture practices with the support of Climate Farmers[20] and with financing from our [Insetting Fund](). This project contributes to the restoration and rehabilitation stage of the mitigation hierarchy: the agricultural practices implemented will minimize soil disturbance, protect soil from wind and water erosion via increased soil coverage, improve crop diversity, and reduce the use of chemical inputs. Potential outcomes include soil carbon sequestration, improved soil fertility, more efficient use of water, greater biodiversity, and improved resilience of crops to extreme weather events. Climate Farmers and Herrmann Kräuter will assess the project's impact in autumn 2025 after the first year of implementation across five areas: biodiversity, soil health, water cycle, farm profitability, and community benefits.

Targets Related to Biodiversity and Ecosystems

The HelloFresh Group does not have biodiversity- or ecosystem-related targets as of 2024, as this was the first year that the topic is assessed as material.

However, as can be observed in the subchapter below, our Food, Safety, and Quality Assurance (FSQA) teams monitor supplier performance on several key sustainable sourcing indicators relevant to biodiversity and ecosystems. Through these indicators, we assess the effectiveness of our sustainable sourcing requirements for suppliers, a key element, as of 2024, of our strategy to address the topic of biodiversity and ecosystems. We have not set quantitative targets for these indicators, but we strive to improve performance over time, while also monitoring supplier non-compliance, for example in case of supply disruptions.

Impact Metrics Related to Biodiversity and Ecosystems Change

As of 2024, the HelloFresh Group tracks the effectiveness of biodiversity actions through metrics focusing on supplier compliance with third-party certification requirements on good traceability, food safety, and/or good agricultural, aquaculture, and fishing practices. We recognize that these do not capture our supply chain's direct impact on biodiversity and other topics covered in the Sustainable Sourcing Policy for our International segment, such as animal well-being, but rather serve as an indicator of the minimization and avoidance efforts that are taken by our suppliers. We will continue to evaluate the appropriateness of our reported metrics, as we further work with our supply chain on improving direct data quality and availability.

Fresh Produce Purchased from Suppliers that Hold a GFSI, GLOBALG.A.P. or Equivalent Certificate

	2024
Fresh produce purchased from suppliers that hold a GFSI, GLOBALG.A.P. or equivalent certificate	96.1%

This metric represents the percentage of fresh produce (herbs, vegetables, fruits) by procurement spend (in euros) that originate from suppliers that hold a GFSI, GLOBALG.A.P., or an equivalent certificate, out of the total HelloFresh Group procurement spend on fresh produce from all suppliers. Brands which make up less than 5% of the Group's revenue are excluded from the metric: Factor EU, Factor Canada, YouFoodz, Good Chop, Green Chef US, and The Pets Table. The metric encompasses all tier 1 suppliers, and where a broker is used (as in our North American segment), we include the GFSI data for the manufacturing site used as per the requirements of our Supplier Approval Program.

Total Fish and Seafood (by Weight) Purchased from a Recognized Scheme (GLOBALG.A.P., MSC, ASC, BAP 2*+)

	2024
Total fish and seafood (by weight) purchased from a recognized scheme (GLOBALG.A.P., MSC, ASC, BAP 2* +)	98.0%

This metric represents the percentage of fish and seafood procured by weight (in kg) from suppliers holding one of the above certifications, out of the total fish and seafood procured by the HelloFresh Group. All meal-kit brand markets are included in the calculation, as well as Factor US, Factor CA, and GoodChop. Smaller ready-to-eat brands such as YouFoodz Australia, The Pets Table, and Factor EU are excluded.

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[20] Climate Farmers is an organization whose mission is to scale regenerative agriculture in Europe.

In EU Markets, Chicken Volume by Weight Procured from Farms where the Stocking Density is Below EU Legislative Maximum

	2024
In EU markets, chicken volume by weight procured from farms where the stocking density is at or below EU legislative maximum	100.0%

This metric represents the percentage of poultry procured by weight (in kg) from suppliers whose on-farm stocking density is at or below the EU legislative maximum, out of the total chicken products procured from all suppliers to the HelloFresh Group's EU markets, excluding small and newer, less developed markets (Ireland and Spain).

Resource Use & Circular Economy

Reducing food waste and increasing packaging circularity is integral to our sustainability approach

Resource Use and Circular Economy

Our 2024 DMA identified two material topics for the HelloFresh Group on resource use and circular economy: food waste and packaging lifecycle management.

We structure our disclosures on policies, actions, and targets separately according to these two topics, as their nature and scope varies significantly, as do our strategies and projects to address them.

Food Waste

We define food waste as any excess ingredients from production that cannot be used in future production cycles, as well as food products which are discarded during food preparation and kitting. As a multidimensional food company, managing food waste is integral to our sustainability approach. Our work in this area is formed by three key components: reduce, donate, and divert from landfill and incineration where possible. Though we do have other waste streams at our sites, the majority of our resource inflows used to manufacture our products are food ingredients, and thus are the focus of our waste management strategies and reporting.

Packaging

Packaging plays a crucial role in maintaining the safety and freshness of our products, helping us deliver the high quality expected by our customers and, as such, reducing food ingredient waste. At the same time, we are committed to minimizing the amount of packaging we use and increasing the sustainability and circularity of our packaging wherever possible. We include the two types of product packaging delivered to customers in our reporting:

- Primary packaging: the first layer of protection for our products, and the last material that our customers open when preparing their meals. Examples include: spice sachets, mushroom containers, liquids cartons, tin cans, sauce packets.
- Secondary packaging: the last layer of protection for our products, which holds all of the meal kits and ready-to-eat trays together, and maintains product quality during transport. Examples include: cardboard boxes, cool pouches, ice packs.

Policies Related to Resource Use and Circular Economy

Food Waste

The HelloFresh Group does not have a company-wide policy on food waste as of 2024, as each market has its own procedures, specificities in waste management requirements, and corresponding procedures. The Continuous Improvement and Transformation team in our International segment, and the Sustainability team in our North America segment, coordinate reporting and data collection on food waste, and report to our C-level on a quarterly basis.

For any leftover food which is appropriate for human consumption, we establish donation partnerships with charity organizations at our facilities to reduce the amount of food products sent to landfill and incineration. For any leftover food which is not appropriate for human consumption, we work with waste treatment partners that collect our organic waste and use it for composting, anaerobic digestion, land application, or animal feed. Our performance on food waste and progress against our targets can be found in the subchapter ["Targets Related to Resource Use and Circular Economy"](#).

Packaging

Our International segment's [Sustainable Sourcing Policy](#) formalizes our commitment to the waste hierarchy (avoiding, reducing, promoting recyclability, and innovating our packaging) when developing new packaging solutions. For our paper-based secondary packaging, where food safety and quality considerations allow, we aim to use paper that is recycled, or that is either Forest Stewardship Council (FSC), or Programme for the Endorsement of Forest Certification (PEFC) certified as an indicator of sustainable forestry practices. The policy therefore supports the transition away from virgin resources, as well as sustainable sourcing principles.

A Sustainable Sourcing Policy for our North American segment is currently underway, and we aim for it to be implemented in 2025. This policy will be based on similar principles and requirements as our International Sustainable Sourcing Policy, while also addressing the US and Canada's market-specific needs.

Actions Related to Resource Use and Circular Economy

Food Waste

Our business model supports the reduction of food waste on two levels: within our own operations, and at the point of consumption by our customers. Our make-to-order system allows us to source more accurate quantities of ingredients based on known consumer selections rather than general demand estimates. This leads to lower volumes of unsold food and lower levels of food waste compared to the make-to-stock system typical for supermarkets. Our high inventory turnover also contributes to lower levels of food waste, as ingredients move more quickly through our lean value chain.

We also contribute to overall waste reduction at source by optimizing our operations and using data monitoring software to track, analyze, and manage our food waste. Surplus fresh food from our operations is channeled to those facing food insecurity in our communities via food donations to local charity partners. Any leftover food which is not appropriate for human consumption is diverted wherever possible away from landfill or incineration and towards organic recycling options including composting, anaerobic digestion, land application, or animal feed. Our actions in this area demonstrate our commitment to improving resource efficiency to first reduce our own operational waste, while also applying value retention and end-of-life actions through our circular business practices – specifically enabling the repurposing and recycling of our ingredients. Our food waste diversion approach is thus aligned with the waste hierarchy (see Figure 1 below).

Figure 1 - Waste hierarchy as presented in the EU's Waste Framework Directive[21]

At the point of consumption by customers, our products can support greater reduction in food waste compared to more traditional methods of buying the ingredients (in varying quantities) at a supermarket and then preparing meals at home. By receiving the exact amount of ingredients required to cook a recipe, or a prepared meal, food waste in households from overbuying, inappropriate ingredient storage, and improper meal planning is avoided. Indeed, lower levels of waste for meal kits were demonstrated in an independent study in 2022[22], which highlighted a 38% reduction in total meal waste at the consumer level when using meal-kit boxes compared to the traditional method of supermarket shopping and then preparing meals.

Given that food waste is a challenge specific to individual markets and production facilities, the strategies and projects to address the challenges are often market- and even facility-specific, and can involve a wide range of stakeholders, including Inventory, Production, and Purchasing teams, as well as our suppliers and customers.

The following disclosures detail the steps we take to first avoid food waste, and subsequently manage it through donations and diversion from landfill/incineration.

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[21] Source: European Commission (EC) Waste Framework Directive, https://environment.ec.europa.eu/topics/waste-and-recycling/waste-framework-directive_en
[22] Schuster, Sebastian, et al. "Do meal boxes reduce food waste from households?" Journal of Cleaner Production (2022): 134001 [The independent research used some of the data that HelloFresh collected from its customers to inform its analysis.]

1. Avoiding Food Waste

Throughout 2024, we progressed in adopting more circular business practices and creating more efficiency in our systems to avoid food waste as a first step in line with the waste hierarchy (see Figure 1 above). For example, in 2024, we introduced a Waste Driver Analysis (WDA) process across our International segment's markets to tackle food waste at its core. This approach helped each market identify the root causes of waste in our facilities, and thus enabled the launch of targeted, insight-driven waste reduction projects. The implementation of the WDA, in combination with market-level waste reduction initiatives, resulted in a 17% decrease in food waste tonnage for our International segment (meal kits) in 2024. Market-level initiatives included a project in the Nordics, where an ingredient expiration report was developed to enhance transparency on and minimize waste due to expiring ingredients. In Australia, we developed a new tool to better integrate stocked ingredients approaching their expiry dates into weekly menus without compromising on the freshness or quality of food items for our customers.

2. Preparing for Re-Use, Recycling and Recovery: Donating and Diverting Food Waste

Although our make-to-order business model enables us to procure precise quantities of ingredients based on known-consumer selections, we still rely on small stock buffers to account for any last-minute changes or supply errors. These buffers can lead to surplus food in our facilities. We align our food waste diverting approach with the EU Waste Framework Directive in Europe, the US EPA's Food Recovery hierarchy in the US, and the National Food Waste Strategy in Australia. Our approach, where possible, prioritizes food donation to charities over recycling and composting as there are fewer carbon emissions and a higher use case associated with donations for human consumption. This helps us reduce our levels of food waste and support those facing food insecurity. As a result of food donation measures across the HelloFresh Group, in 2024 we donated 8,799.4 tons of unsold edible food. This represents 36% of our total food waste.

For food surplus/waste that cannot be used for human consumption, we arrange local organics recycling options as a priority over landfill or incineration. In 2024, 31 out of our 33 global production sites had an organics recycling solution.

To underpin our food waste efforts, we established a new waste governance structure at our Canadian facilities, implemented internal monthly audits, conducted waste audits at our meal-kit facilities, and rolled-out training and a waste reduction week campaign for our facilities' staff in 2024. We believe that strong operating procedures and documentation are key to a successful food waste donation and handling program.

Packaging

Packaging plays a crucial role in maintaining the freshness of our products and in safe delivery to our customers. To reduce the environmental impacts of our packaging, we aim to minimize unnecessary packaging and increase the sustainability and circularity of our packaging wherever possible. To guide our actions, we follow the waste hierarchy of avoiding, reducing, promoting recyclability, and innovating to develop new packaging solutions.

1. Avoiding and Reducing Packaging

In our International segment, we use our Dynamic Packaging Configurator (DPC) to optimize the secondary packaging of all meal-kit brands. The DPC uses metadata on the shapes, dimensions, and volumes of our ingredients to calculate the right packaging sizes, with the goal to optimize fill-rates. Based on the outside temperature, it also assigns the right insulation type and amount of ice needed to maintain food safety, while optimizing packaging usage.

In the US, we have a similar initiative, the Box Fit program, which we continued to run in 2024 for all meal-kit brands. We extended the program to Factor US in September 2024, which involved an update in the box sizing logic to consider the liner and ice pack volumes when assigning a box size to a customer order. This helps us to ultimately reduce excess packaging and unused box space.

Additionally, several initiatives were implemented in our International segment's markets to reduce the amount of secondary packaging sent to customers by optimizing the size and weight of boxes and other packaging materials. For example, in September 2024, we introduced a smaller box size in our Norwegian market for customer orders with fewer meals. A similar project is being tested in our UK market.

2. Recycling and End-of Life Actions as a Circular Business Practice: Innovation in Primary Packaging Materials

Two projects were underway in 2024 to increase the recyclability and repurpose rate of our primary packaging in our Factors business in Canada, and in our International segment's markets. We continued to test the use of bagasse (a material derived from sugar cane processing) as a compostable alternative to plastic for Factor Canada's bento boxes. In our International segment, we committed to supporting a project with our supplier for dressings and sauces to transition to cellulose-based packaging as an alternative to plastic.

We also developed a packaging roadmap for Factor US, to continue improving on the sustainability and circularity of our product packaging. The roadmap defines a packaging material hierarchy, which will support our teams in applying circular design principles to our products, in particular in the evaluation of packaging material alternatives.

Metrics and Targets

Targets Related to Resource Use and Circular Economy

Packaging

We have not set targets related to packaging (circular product design, primary raw material use, or sustainable sourcing and use of renewable resources), given the complexity and multifaceted nature of improving packaging sustainability while also maintaining food safety and quality. Despite not having targets for our packaging, we have reduced the amount of packaging materials used per meal.

Food Waste

Due to the significance and materiality of food waste for our industry and our own operations, the HelloFresh Group Management Board, together with our Global Sustainability function, set clear targets on food waste reduction per euro of revenue:

We have two active food waste reduction targets:

- By 2025: Reduce food waste sent to landfill and incineration by 52% per euro of revenue from our meal-kit production facilities where the HelloFresh Group has operational control[23], from a 2019 baseline[24].
- By 2025: Reduce food waste sent to landfill and incineration by 56% per euro of revenue in our other businesses' production facilities where the HelloFresh Group has operational control, from a 2021 baseline[24].

Food waste occurs as a result of production processes in our facilities, and therefore these targets are classed as resource outflows. The targets relate to waste management and increasing circular material use rate by setting clear goals to avoid disposal of food waste, and promoting the reuse or recycling of purchased food products that would otherwise not be used or sold by the HelloFresh Group. For example, alternative uses to disposal via landfill and incineration that are being used to achieve these targets include: donations, composting, anaerobic digestion, land application, or animal feed.

Please see the table below for more detailed metrics on our food waste reduction targets.

Group Food Waste	2024	2023
Meal-kit business		
Food waste disposed per euro of revenue	0.20 g	0.14 g
Other businesses		
Food waste disposed per euro of revenue	1.13 g	0.54 g

In our International segment, we additionally set individual market-level objectives to track progress at a more granular level.

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[23] Sites over which the HelloFresh Group has operational control, as defined by the GHG protocol: where we have the authority to introduce and implement our own operating policies.
[24] The 2019 and 2021 baselines are out of the external assurance scope

Food Waste Disposed in own Operated Meal-kit Facilities per Euro of Revenue

Baseline 2019²

-66%

2019	2020	2021	2022	2023	2024
0.60 g	0.40 g	0.68 g	0.38 g¹	0.14 g	0.20 g
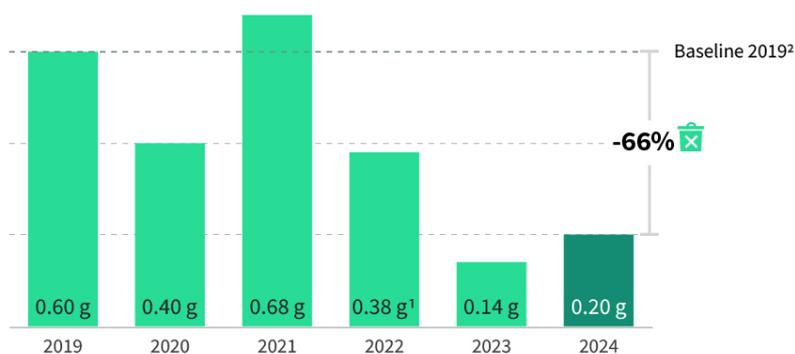
¹ Figure corrected based on revised process
² The 2019 baseline is out of the external assurance scope.

Food Waste Disposed in own Operated Ready-to-eat and Other Business Facilities per Euro of Revenue

Baseline 2021¹

-58%

2021	2022	2023	2024
2.73 g	2.18 g	0.54 g	1.13 g
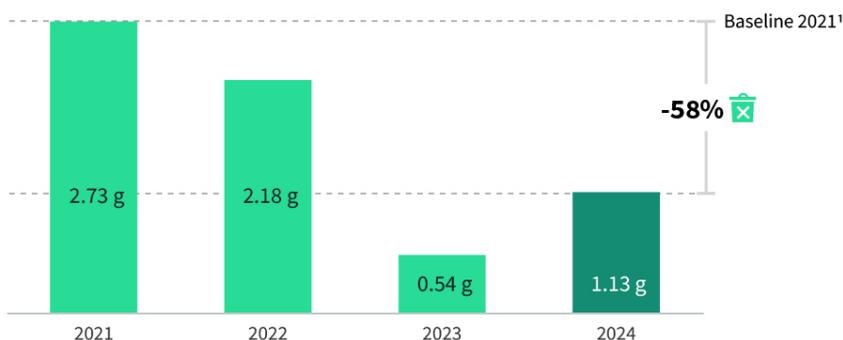
¹ The 2021 baseline is out of the external assurance scope.

Despite the efforts made throughout the reporting year to further reduce our food waste sent to landfill and incineration, an increase compared to the previous reporting year can be observed. This is the result of improvements in reporting processes, increased quality of underlying data and further harmonizing of our procedures across our International and North American segments. Even though food waste to landfill figures increased in 2024, we have realized a reduction of 66% in meal-kit facilities against the 2019 baseline, and a reduction of 58% in our ready-to eat facilities against the 2021 baseline, and remain on track to meet our 2025 targets.

Methodology, Assumptions, and Calculations

As with our emissions reduction targets, our food waste targets are compensation-linked and thus influence the variable compensation components of our Management Board. The targets are intensity-based, normalizing the total tons of food waste diverted to landfill or incineration by facilities over which we have operational control relative to our revenue. In line with the waste hierarchy, the targets incentivize the reduction of waste at source, and where this is not possible, diversion towards organics recycling, composting, or donations. The HelloFresh Group has set these targets voluntarily; they are not mandated by legislation.

The targets were set using two metrics: total grams of food waste diverted to landfill or incineration (numerator) and total revenue (in euros) for the base year (denominator). The reduction targets are applicable to food waste disposed to landfill or incineration, given that the least circular value is generated from these waste streams. Diversion from disposal includes recovery operations, such as use for animal feed or anaerobic digestion, recycling via composting, or reuse through donations of food for human consumption.

For our meal-kit business, our food waste reduction target was set using our 2019 baseline, which is 0.60 grams per euro of revenue. For our ready-to-eat product category, the baseline used is from 2021, with 2.73 grams per euro of revenue[25].

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[25] When our meal-kit business-related target was set, we only had one product category. Our second food waste target was set following the acquisition of Factor 75 and other brands, which expanded our product categories.

Given that the scope of these targets is those facilities over which we have operational control, our facilities for GoodChop, The Pets Table, and Factor Benelux brands, as well as meal-kit facilities in Italy, Spain, Ireland, and Switzerland are excluded; we do not have operational control over these facilities. Additionally, our BeCool and HelloConnect subsidiaries are not within scope as they do not generate revenue from the production of food products, and thus are not relevant for food waste.

Tracking Target Progress, and Relevant Performance Trends

Progress against our targets is tracked and reported to the HelloFresh Group's C-level executives on a quarterly basis.

Resource Inflows

Resource Inflows Description

The HelloFresh Group has two resource inflows related to the manufacturing of our products: ingredients and packaging.

Ingredients are the food items that we purchase to assemble and prepare our meal kits, ready-to-eat meals, and pet food. Examples include: fruits, vegetables, fresh herbs, spices, canned products (beans, tomatoes), meat, fish, plant-based protein alternatives, grains, and convenience products (prepared desserts, baking mixes).

For food safety and quality purposes, these ingredients and prepared meals need to be sent to customers with packaging. For our meal kits, the primary packaging of procured ingredients is prepared by the food product suppliers in line with defined specifications. For ready-to-eat primary and secondary packaging, as well as meal-kit secondary packaging, we procure packaging from specialized suppliers.

Overall Total Weight of Products and Technical and Biological Materials

in tons	2024		
	Primary	**Secondary**	**Total**
Total weight of products and technical and biological materials Used	12,782.4	98,070.6	**110,853.0**
Share of biological materials (%)	9.5%	92.4%	**82.8%**
Total weight of recycled components	496.5	40,425.4	**40,921.8**
Share of recycled components (%)	3.9%	41.2%	**36.9%**

We define technical materials as any packaging that is made from non-biological materials: metal, plastics, glass, and Tetra Pak. For biological materials, we include packaging that is made of biodegradable or compostable materials, as well as paper-based packaging. Where material type information was not available, we assume that the packaging used is technical, and calculate average material weight by the corresponding ingredient category. As we consider our ingredients to be a fully biological - and therefore recyclable - material, we focus our disclosure on recycled content of resource inflows on our product packaging, as this is the area where our operations can have the largest impact.

For primary packaging, we collect primary data on material type, weight, and amount of recycled content from suppliers, and match it with ingredient consumption values. Where primary data is not available, we use estimates based on average values for each ingredient category (for example, proteins, beverages, spices, dairy). For secondary packaging, we similarly gather information on material type, weight, and recycled content directly from suppliers, and match it to consumption values.

Resource Outflows

Packaging Recyclability

Similar to the reporting of resource inflows above, we also focus our disclosure on the recyclability of resource outflows to solely include the rates of recyclable content in product packaging:

% Recyclability of Product Packaging	2024
Primary Packaging	35.5%
Secondary Packaging	93.6%
Total Product Packaging	**82.3%**

To assess recyclability of our product packaging, we use primary data from suppliers for material type, recyclability, and weight where available, and apply estimates for incorrect or missing values, as described in the Resource Inflows subchapter above. Once the recyclability of a packaging material is determined, we calculate the % recyclability of our product packaging by matching individual unit weights with consumption values, and dividing this figure by total packaging material weight.

Waste

Given the nature of our products, and as identified by our DMA, food waste is our most material waste stream. We therefore concentrated our data collection efforts on food waste in 2024, with our reporting focused on the food waste volumes generated at our facilities. As this represents only a part of our overall waste footprint, we are establishing improved data collection processes for our other production waste streams, and will report on these in 2025.

Our facility managers and warehouse management systems track the movement of food ingredients in our facilities, including whether they are consumed in production, disposed of, or donated. We use this data to match the number of disposed ingredients with their corresponding weights to calculate the total tons of food that are disposed of or donated throughout our operations. For disposals, volumes are then allocated to the different waste treatment types (directed to landfill or incineration, to recycling, or other recovery operations), based on on-site observations by facility managers.

in tons	2024
Food waste diverted from disposal	**20,707.6**
Food waste diverted from disposal due to donations[1]	8,799.4
Food waste diverted from disposal due to recycling[2]	7,530.7
Food waste diverted from disposal due to other recovery operations[3]	4,377.5
Food waste directed to disposal	**3,423.4**
Food waste directed to disposal by incineration	25.5
Food waste directed to disposal by landfilling	3,397.9
Food waste directed to disposal by other disposal operations[4]	0.0
Total food waste	**24,131.0**
% of non-recycled food waste[5]	14.2%

[1] Donations: via charity partners for human consumption
[2] Recycling: composting
[3] Other recovery operations: use as animal feed, or for anaerobic digestions
[4] Other disposal operations: there are currently no other disposal methods apart from landfill and incineration for the HelloFresh Group
[5] Non-recycled waste: calculated as a % of total food waste that is directed to disposal

EU Taxonomy

EU Taxonomy

Regulatory Landscape and Context

The Commission Delegated Regulation (EU) 2021/2139 (4 June 2021) supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council, known as the EU Taxonomy Regulation (further "EU Taxonomy") is a science-based classification system establishing which economic activities can be considered environmentally sustainable. The regulation is a key component of the European Commission's action plan to redirect capital flows towards a more sustainable economy.

The Commission Delegated Regulation (EU) 2022/1214 (9 March 2022) that amends the Delegated Regulation (EU) 2021/2139 in regard to the economic activities in certain energy sectors and the Delegated Regulation (EU) 2021/2178 (6 July 2021) regarding specific public disclosures for those economic activities were considered for the purposes of this disclosure. The EU Commission published two additional draft FAQs on the Climate Delegated Act and Article 8 Delegated Act (19 December 2022), which have also been reviewed for the purpose of this report.

In addition, the European Commission approved, in principle, on 13 June 2023, a new set of EU Taxonomy criteria for economic activities making a substantial contribution to one or more of the non-climate environmental objectives, namely: sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems. The Environmental Delegated Act includes proposed changes to the Disclosures Delegated Act, including the content of the mandatory reporting templates.

To complement this, the Commission has adopted targeted amendments to the EU Taxonomy Climate Delegated Act, which expand on economic activities contributing to climate change mitigation and adaptation that had not been included so far, focusing on manufacture and transport sectors.

Finally, the Draft Commission Notice on the interpretation and implementation of certain legal provisions of the EU Taxonomy Environmental Delegated Act, the EU Taxonomy Climate Delegated Act and the EU Taxonomy Disclosures Delegated Act, published on 29 November 2024 has also been reviewed.

Reporting Requirements for the HelloFresh Group

As a large non-financial undertaking, the HelloFresh Group is required to present the share of the group turnover, capital expenditure (CapEx), and operating expenditure (OpEx) for the reporting period 2024 that is associated with EU Taxonomy-eligible economic activities under the first two environmental objectives (climate change mitigation and climate change adaptation, including for the expanded activities), as well as the non-climate environmental objectives listed above, in accordance with Article 8 of the Taxonomy Regulation and Article 10 (2) of the Article 8 Delegated Act.

An economic activity is Taxonomy-eligible if it fits the description of any of the activities corresponding to the six environmental objectives detailed in the Delegated Acts supplementing the EU Taxonomy. We have excluded activities that represented less than 0.1% of their respective KPIs (turnover, CapEx and OpEx).

Additionally, as a large non-financial undertaking, HelloFresh is required to present the share of the turnover, CapEx, and OpEx for the reporting period 2024 that is also Taxonomy-aligned.

An economic activity is Taxonomy-aligned where the activity is eligible and complies with all of the following: the Substantial Contribution (SC) criteria; the Do No Significant Harm (DNSH) criteria; and the Minimum Safeguards (MS).

Eligibility and Alignment Disclosures

	Proportion of turnover / total turnover		Proportion of CapEx / total CapEx		Proportion of OpEx / total OpEx	
	Taxonomy-aligned (per objective)	Taxonomy eligible (per objective)	Taxonomy-aligned (per objective)	Taxonomy eligible (per objective)	Taxonomy-aligned (per objective)	Taxonomy eligible (per objective)
CCM	0.0%	0.0%	0.0%	17.5%	0.0%	20.5%
CCA	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
WTR	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
CE	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
PPC	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
BIO	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Climate change mitigation (CCM)
Climate change adaptation (CCA)
Water and marine resources (WTR)
Circular economy (CE)
Pollution (PPC)
Biodiversity and ecosystem (BIO)

Turnover	FY 2024		SC[1] criteria						DNSH[2] criteria									
Economic activities (1)	Code(s) (2)	Absolute Turnover (3)	Proportion of Turnover (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity (16)	Minimum safeguards (17)	Taxonomy-aligned proportion of turnover, FY2023 (18)	Category enabling activity (19)	Category transitional activity (20)
		MEUR	%	Y; N; EL; N/EL[3]	Y; N; EL; N/EL	Y; N; EL; N/EL	Y; N; EL; N/EL	Y; N; EL; N/EL	Y; N; EL; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E[4]	T[5]
A. TAXONOMY ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	0%	0%	0%	0%	0%	0%								0%	N/A	N/A
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0%														0%	N/A	N/A
A. Turnover of Taxonomy eligible activities (A1+A2)		0	0%														0.0%	—%	
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Turnover of Taxonomy-non-eligible activities (B)		7,661	100%																
Total A + B		**7,661**	**100%**																

[1] Substantial Contribution
[2] Do No Significant Harm
[3] Y - Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective; N - No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective; EL: Eligible, Taxonomy-eligible activity for the relevant environmental objective; N/EL - Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective
[4] E - Enabling
[5] T - Transitional

Turnover is defined as net turnover applying IFRS (IAS 1 Paragraph 82(a)) and is disclosed in note 6 of the Group's 2024 Annual Report as Group Revenue for a total consideration of MEUR 7,661.3 for the financial year 2024 (2023: MEUR 7,596.6).

The EU Taxonomy is a cornerstone of the EU's sustainable finance framework and an important market transparency tool that helps direct investments to the economic activities most needed for a green transition. As such, the Commission has so far focused on a number of economic activities that are perceived to be generating the greatest environmental and climate impacts, such as manufacturing, transportation, and energy production. At the time of this report's publication, food production, food distribution, and activities related directly with food manufacturing were outside of the scope of the EU Taxonomy.

The core revenue sources for the HelloFresh Group – the sale of meal kits, ready-to-eat and other direct to consumer food products and subscriptions – cannot be classified into one of the activities described in the EU Taxonomy.

A performed analysis of all activities showed that only one particular revenue stream is derived from offering refrigerated courier services to third parties and was identified as eligible under Activity 6.5: Transport by motorbikes, passenger cars and light commercial vehicles of the Climate Change Mitigation objective. However, it was immaterial to the HelloFresh Group in 2024 and therefore not included in the reporting.

Economic activities (1)	Code(s) (2)	Absolute CapEx (3)	Proportion of CapEx (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1) or eligible (A.2) CapEx, FY 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
		FY 2024		**SC[1] criteria**						**DNSH[2] criteria**									
		MEUR	%[6]	Y; N; EL; N/EL[3]	Y; N; EL; N/EL	Y; N; EL; N/EL	Y; N; EL; N/EL	Y; N; EL; N/EL	Y; N; EL; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E[4]	T[5]
A. TAXONOMY ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%								0.0%		
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Manufacturing of plastics packaging goods	1.1 CE	—															0.1%		
Collection and transport of non-hazardous waste in source segregated fractions	5.5 CCM	9.4	3.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.5%		
Transport by motorbikes, passenger cars, and light commercial vehicles	6.5 CCM	9.7	3.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								5.4%		
Installation, maintenance, and repair of charging stations for electric vehicles in buildings	7.4 CCM	0.6	0.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								—%		
Acquisition and ownership of buildings	7.7 CCM	35.8	11.3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								18.2%		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		55.5	17.5%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%								24.3%		
A. CapEx of Taxonomy eligible activities (A1+A2)		55.5	17.5%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%								24.3%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
CapEx of Taxonomy-non-eligible activities (B)		261.2	85.6%																
Total A + B		**316.7**	**100%**																

[1] Substantial Contribution

[2] Do No Significant Harm

[3] Y - Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective; N - No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective; EL: Eligible, Taxonomy-eligible activity for the relevant environmental objective. N/EL - Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

[4] E - Enabling

[5] T - Transitional

[6] The percentages have been calculated on the basis of the non-rounded Euro amounts, consequently, rounding differences may occur

Total CapEx, as defined by the EU Taxonomy, shall cover additions to tangible and intangible assets during the financial year. CapEx additions are considered before depreciation, amortization and any remeasurements for the relevant financial year and exclude fair value changes (IAS 16, 38, 40, 41, IFRS 16). CapEx additions also cover additions to tangible and intangible assets resulting from business combinations (applying IFRS 3). Total CapEx additions (denominator) for the financial year 2024 for HelloFresh SE amount to MEUR 316.7 (2023: MEUR 418.9) as per Notes 8 "Property, Plant and Equipment" and 10 "Intangible Assets" of the Group's 2024 Annual Report. Acquired goodwill is not included.

The performance of an analysis of all economic activities revealed that 17.5% (2023: 24.3%) of the CapEx is considered to be eligible under the definition of the EU Taxonomy, as they relate to the purchase of output from Taxonomy-eligible economic activities or related to assets or processes that are associated with Taxonomy-eligible economic activities. The figure corresponds to expenditures that have been classified under one of the following activities:

Activities above the HelloFresh Group's materiality threshold regarding the environmental objective climate change mitigation:

- Activity 5.5: Collection and transport of non-hazardous waste in source segregated fractions
- Activity 6.5: Transport by motorbikes, passenger cars, and light commercial vehicles
- Activity 7.7: Acquisition and ownership of buildings
- In addition, Activity 7.4: Installation, maintenance, and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings) was found to be material in 2024

There were no activities above the HelloFresh Group's materiality threshold regarding the environmental objective transition to a circular economy. Last year, activity 1.1: Manufacturing of plastics packaging goods was found to be material, but that was not the case in 2024 given the majority of the machinery related to that activity was installed last year.

OpEx		FY 2024		SC[1] criteria						DNSH[2] criteria									
Economic activities (1)	Code(s) (2)	Absolute OpEx (3)	Proportion of OpEx (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1) or eligible (A.2) OpEx, FY 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
		MEUR	%[6]	Y; N; EL; N/EL[3]	Y; N; EL; N/EL	Y; N; EL; N/EL	Y; N; EL; N/EL	Y; N; EL; N/EL	Y; N; EL; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E[4]	T[5]
A. TAXONOMY ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.0	0%	0%	0%	0%	0%	0%	0%								0%		
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Collection and transport of non-hazardous waste in source segregated fractions	5.5 CCM	1.1	0.6%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.2%		
Transport by motorbikes, passenger cars and light commercial vehicles	6.5 CCM	16.2	8.9%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								16.1%		
Acquisition and ownership of buildings	7.7 CCM	4.5	2.5%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								2.5%		
Data processing, hosting and related activities	8.1 CCM	15.5	8.5%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								7.7%		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		37.3	20.5%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%								26.5%		
A. OpEx of Taxonomy eligible activities (A1+A2)		37.3	20.5%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%								26.5%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OpEx of Taxonomy-non-eligible activities (B)		144.9	79.5%																
Total A + B		**182.2**	**100%**																

[1] Substantial Contribution
[2] Do No Significant Harm
[3] Y - Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective; N - No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective; EL: Eligible, Taxonomy-eligible activity for the relevant environmental objective. N/EL - Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective
[4] E - Enabling
[5] T - Transitional
[6] The percentages have been calculated on the basis of the non-rounded Euro amounts, consequently, rounding differences may occur

Total OpEx, as defined by the EU Taxonomy, shall cover direct non-capitalized costs relating to research and development (R&D), building renovation measures, short-term lease, maintenance and repair, and any other direct expenditures relating to the day-to-day servicing of assets of property, plant, and equipment by the undertaking or third-party outsources that are necessary to ensure the continued and effective functioning of such assets. It should be noted that research and development costs already accounted for in CapEx shall not be counted as OpEx (for instance, development costs for intangible assets, IAS 38).

The EU Taxonomy OpEx definition is restrictive and should not be confused with a more standard (and broad) definition of OpEx commonly used in financial reporting, or in the case of the HelloFresh Group, with fulfillment expenses. Under the EU Taxonomy definition, total OpEx for the financial year 2024 amounts to MEUR 182.2 (2023 MEUR 169.7)

The performance of an analysis of all economic activities, including the newly added ones, revealed that 20.5% (2023: 26.5%) of that OpEx is considered to be eligible under the definition of the EU Taxonomy, as they relate to the purchase of output from Taxonomy-eligible economic activities or related to assets or processes that are associated with Taxonomy-eligible economic activities.

The decrease in eligible OpEx is mainly due to a decrease in eligible expenses related to activity 6.5.

In 2024, the following activities are above the HelloFresh Group's materiality threshold and therefore identified as eligible, all under climate change mitigation:

- Activity 5.5: Collection and transport of non-hazardous waste in source segregated fractions

- Activity 6.5: Transport by motorbikes, passenger cars, and light commercial vehicles

- Activity 7.7: Acquisition and ownership of buildings

- Activity 8.1: Data processing, hosting and related activities

The HelloFresh Group's relevant economic activities only contribute to either climate change mitigation or transition to a circular economy. Therefore, double counting could be avoided.

Alignment Assessment

The HelloFresh Group continues to believe the transition to a climate-neutral and sustainable economy by 2050 offers new opportunities for companies and citizens across the EU, and remains supportive of the EU sustainable finance framework and developments around it.

The practical implementation of the EU-Taxonomy reporting requirements remains challenging, primarily driven by:
- Difficulties experienced by various agents across the value chain to provide, in an auditable manner, if at all, the necessary information required to comply with the SC and the DNSH criteria.
- Misalignment in standards and frameworks across geographies, particularly in the US, against EU Taxonomy criteria.
- Difficulty to integrate in-depth physical climate risk assessment considerations into the existing Enterprise Risk Management System (ERMS) to the level of analysis required by the EU Taxonomy.

DNSH Criteria

The Taxonomy regulation requires undertakings, among other criteria, to conduct a robust scenario-based climate risk and vulnerability assessment in the reporting year that follows a number of predetermined steps and criteria. The risks that need to be evaluated are established by the EU Taxonomy regulation, which includes a comprehensive list of temperature-related, wind-related, water-related, and solid mass-related acute and chronic risks that are to be evaluated at the activity level.

While a number of climate/weather-related risks were identified and analyzed at the Group level as part of the standard 2024 risk assessment processes for the HelloFresh Group, these do not cover all taxonomy proposed risks to the level of granularity that is required to establish alignment.

As a result, the requirements of Appendix A could not be met. Therefore, no further DNSH criteria assessment was performed.

Substantial Contribution (SC) Criteria

The SC criteria requirements of our identified Taxonomy-eligible activities could not be met, mainly due to insufficient information from third parties provided in our systems.

Minimum Safeguards

Our assessment of minimum safeguards criteria revealed that we did not comply with all requirements. For further details on our ethical trading and fair labor practices, including on our human rights risk assessment, please refer to the subchapter "General Policies Related to Own Workforce" of this report. This subchapter also provides information on our Code of Ethics.

Final Note

The table below captures the requirements of the Supplementary Delegated Act 2022/1214 dated 9 March 2022, with regard to nuclear and gas power, pertaining to the HelloFresh Group.

	Nuclear energy related activities	
1	The undertaking carries out, funds or has exposures to research, development, demonstration, and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
	Fossil gas related activities	
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

Social

Own Workforce

Our employees are as unique as they are diverse, yet we are all united to change the way people eat – forever

Own Workforce

Our workforce is a source of pride and inspiration. Our employees and their talents are as unique as they are diverse, and yet we are all united by one shared mission: to change the way people eat - forever.

The following chapter describes our material topics related to our own workforce, as well as the policies, processes, actions, metrics, and targets that we have in place to manage them.

Given the wide range of material topics that we have identified related to our own workforce, we have structured this section of the report into theme-specific subchapters. This approach allows us to best demonstrate how our policies, actions and processes specifically address each topic, and how metrics are used to track our progress.

General Policies Related to Own Workforce

Code of Ethics

Our Code of Ethics ("the Code") outlines our commitment to provide a safe and inclusive workplace based on our core values of respect, responsibility, and integrity. It sets out our ethical standards and provides clear guidance on how we expect everyone at the HelloFresh Group to uphold these standards in their day-to-day work. The Code applies to everyone working at the HelloFresh Group across all markets, including our Management Board, Managing Directors, and Executive Officers.

The Code states that the HelloFresh Group does not tolerate any form of child labor, modern slavery, excessive working hours, or any other violations, and underlines our support for the principles established under the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Our ethical standards set out in the Code are further specified in different Group-wide compliance policies which are referenced in the respective sections of the Code, such as our Ethical Trading Policy (see below). In addition, they are complemented by local compliance policies in individual markets.

The Code is communicated to our employees through various channels. It is included in our employment contracts, in our mandatory annual compliance training, and is available on our Group intranet and Group website. The overall responsibility for the implementation of the Code is with our Management Board. For a detailed description of our approach to respecting human rights, including labor rights, please see the disclosure on our Human Rights Statement below.

Ethical Trading Policy

Our Ethical Trading Policy sets out our binding minimum standards for ethical conduct in our own operations, and those of our suppliers, including the prohibition of child labor or any form of forced labor, compulsory labor, or human trafficking. These standards are based on the Universal Declaration of Human Rights and ILO standards.

The Ethical Trading Policy is available to employees at all times on our Group intranet and our Group website.

Human Rights Statement

In 2023, we started to roll out a Group-wide human rights due diligence program that aligns with the German Supply Chain Act. As part of this program, we have published our Human Rights Statement, which emphasizes our commitment to protect human rights, as well as our strategy to mitigate risks for human rights and respond to violations in our own operations and supply chains. Our strategy is based on international frameworks and guidelines such as the Universal Declaration of Human Rights, the ILO, and the OECD Guidelines for Multinational Enterprises. At the heart of our due diligence program is an annual risk assessment to identify human rights risks in our own operations and supply chains worldwide. Based on the results of our risk assessments, we develop and implement measures to mitigate identified risks. If violations are identified, we take immediate action to respond to these violations. The implementation of the due diligence program is monitored by our Human Rights Officer, who reports directly to the Chief Financial Officer. For further information, please refer to the HelloFresh Group Human Rights Statement.

Whistleblowing Policy

The Group Whistleblowing Policy describes the grievance mechanism in place at the HelloFresh Group. The HelloFresh Group offers everyone inside and outside our organization, including those in our value chain (upstream and downstream), the possibility to report concerns. The grievance mechanism can be used to report suspected violations

and risks that affect our employees, our direct and indirect suppliers in our supply chain, other business partners, or other third parties.

Our Whistleblowing Policy and access to the grievance mechanism are made available to employees via the HelloFresh website (both internally and externally), the HelloFresh Group intranet, in our annual compliance training, and in our Code of Ethics and Ethical Trading Policy (both available on our company intranet and [website](#)).

Processes for Engaging with Own Workforce

Employee Surveys

Employee surveys are conducted across the HelloFresh Group to identify, assess, and address a broad range of employee experiences and needs. In 2024, we ran our bi-annual Engagement Survey with all employees, which focused on topics such as engagement, management, well-being, compensation and benefits, and learning and development. Separately, we launched our second Diversity, Equity and Inclusion (DE&I) survey across all International markets in 2024, which will continue annually. The DE&I survey aims to gather additional demographic data from our employees, as well as to quantitatively measure their levels of inclusion and engagement, and the main drivers behind them. The 2024 iteration explored areas like inclusion, psychological safety, and employee ability to voice concerns. The survey is sent to all relevant employees through e-mail and internal communication platforms, and local teams may also choose to create their own internal communications campaigns. Specifically on Health and Safety, our International segment conducts an annual survey, which focuses on health and safety culture, sentiment and engagement, assessing all team members' views on our proactivity, purpose, people and processes. Engagement rates are monitored across each survey.

The senior leadership overseeing employee experience for our respective International and North American segments at the HelloFresh Group holds ultimate responsibility for ensuring that this engagement with our own workforce occurs and results in targeted action plans and commitments.

Employee Resource Groups

We established our first Employee Resource Groups (ERGs) in 2018, and have added new groups over the years to support our diversity and inclusion approach. These groups serve to promote employee interests across themes such as gender, sexual orientation, family status, religion and ethnicity/race equality, and thus form an integral part of how we communicate and engage with our employees on DE&I, and on learning and development. Employees with a shared interest in diversity-related topics can voluntarily join the groups to feel a sense of community, increase their network, share in discussions and training, and mark important occasions. ERGs are formed by volunteer employees on a regional level and meet regularly (at minimum, quarterly), and host events and initiatives throughout the year. ERGs also help to drive the review of processes and policies, are involved in development and community initiatives, and act as consultants to different teams and leadership.

In 2024, we introduced the following ERGs:

- African Heritage Network (HelloFresh SE & DACH, Berlin): committed to fostering an inclusive, supportive, and equitable environment for African and Black employees. The network promotes professional development, advocates for empowerment and equality, and celebrates the diverse perspectives and contributions of the community.

- Black Heritage Network (HelloFresh UK): dedicated to creating spaces where the Black community can connect, grow, and thrive.

- Neuroinclusion, Empowerment, and Unity Network (HelloFresh SE & DACH, Berlin & HelloFresh UK): committed to fostering an inclusive and supportive workplace that values and celebrates neurodivergent individuals. The mission is to promote awareness, understanding, and acceptance of neurodiversity while contributing towards a culture that embraces the unique strengths and perspectives of all employees.

The HelloFresh Group thus has a total of 15 ERGs across our different markets:

ERG Name	Location(s)
Asians Mobilizing for Progress (AMP)	US
Asian Network	Berlin
DESI	Berlin
FreshParents	Berlin, Benelux, US
FreshPride	Berlin, US, UK, Benelux, Nordics, Canada
FreshVets	UK, US
Gender Equality Team (GET)	Berlin
LIMES (Leveraging Inclusivity for Minority Employee Success)	US, Canada
Muslim Community Network	Berlin
Women Inclusion Network (WIN)	US, Canada
CHAI (Chutzpah, Harmony and Inclusion)	US
African Heritage Network	Berlin
Black Heritage Network	UK
NEU Network (Neuroinclusion, Empowerment, and Unity)	Berlin, UK
DE&I Committee/DE&I Guild	DACH, Australia & New Zealand, Ireland

Each ERG has a chair who holds overall accountability for implementation and engagement. Each ERG also has an executive sponsor, who supports the ERG in achieving more visibility, and offers a direct line of communication with senior leadership.

ERG highlights are shared with the respective leadership team and DE&I Steering Committee on a monthly or quarterly basis. The increased exposure of ERGs to senior leadership helps drive the implementation of actions and initiatives within the business that address the needs of employees.

Works Council

At HelloFresh SE, we also engage with our own workforce through a Works Council based in Berlin, Germany, which is composed of elected employee representatives. The Works Council for HelloFresh SE supports the collection of employee opinions by conducting surveys on a variety of topics, and incorporates key findings into meetings with our Director of Employee Relations, who is responsible for HelloFresh SE's engagement with the Works Council.

As a result of monthly exchanges between the Works Council and our Director for Employee Relations, we have, among others, coordinated on the following agreements and processes in 2024:

- Hybrid Work Agreement: a works agreement on the topic of flexible working in the office and from home was concluded.

- Internal Mobility Process: the Works Council has provided feedback on our initially proposed approach with the aim of establishing a fairer process for internal mobility. The aim of our internal mobility process is to encourage career development and skills growth within HelloFresh SE for our employees.

Processes to Remediate Negative Impacts on Own Workforce

Grievance Mechanism

If concerns regarding potential violations of our ethical standards, as set out in our Code of Ethics, and other compliance policies or applicable laws are raised through our grievance mechanism, we systematically review, investigate and take corrective action where necessary. Our grievance mechanism can be used by internal and external stakeholders to report any concerns regarding violations of our ethical standards or applicable laws, including topics such as DE&I, Health and Safety, and Human Rights.

Our grievance mechanism includes a whistleblowing tool – our SpeakUp! platform – which is accessible for our employees as well as for any external stakeholders via a mobile app and web browser, and allows for anonymous reporting if preferred. For employees in our facilities, we provide the additional option to report concerns via a phone line. These channels are available to all employees globally. For further information on our complaint procedure, please refer to our Whistleblowing Policy. In addition, employees can raise concerns directly with their line manager, Local

Compliance Officer, Legal Department, dedicated Human Resources contact points, or our Global Ethics and Compliance team.

We do not tolerate any retaliation against anyone who reports a concern in good faith or cooperates in an investigation, regardless of whether the concern is confirmed. Individuals who believe they have experienced retaliation are asked to report this to our Global Ethics and Compliance team.

Our remediation process provides for a standardized approach to investigating and responding to concerns regarding violations of our ethical standards. If a concern regarding a potential violation has been identified through one of our reporting channels, the responsible incident manager will determine whether any immediate actions are required to address the violation or to mitigate further violations, and whether a formal investigation is required. Depending on the result of the investigation, appropriate actions are agreed upon with the relevant parties. This may include corrective actions to remedy occurred violations such as disciplinary measures ranging from a written warning, to summary dismissal of the respective employee, but also preventive actions to mitigate risk of violations in the future such as training, policy review, or others.

Our strategy to ensure the effectiveness of our grievance mechanism is based on a comprehensive communication approach including the earlier-mentioned SpeakUp! platform, posters with Quick Response (QR) codes which direct workers to further information, integration in all relevant compliance policies, and annual training on how to report a concern. In addition, we track the number of reports received through our grievance mechanism in our Group-wide case management system. Regular checks are conducted in our facilities on whether information on our grievance mechanism is available and accessible.

Additionally, as part of our International segment's DE&I survey launched in 2024, we asked employees whether the processes in place to address instances of discrimination and harassment are perceived as effective. Answers to this question were assessed to determine awareness and effectiveness of our grievance mechanism, specifically the SpeakUp! platform. Following this, we launched a [Discrimination and Harassment Prevention Training](#) across all markets, aimed at educating employees on how to identify and report discrimination and harassment via our [SpeakUp!](#) channels. We also launched a Group-wide campaign on the topic. We will continue to monitor the effectiveness of these efforts in the 2025 DE&I survey.

Our grievance mechanism is included in our annual compliance training (e-learning), which is rolled out through our central learning management system (LMS). We monitor completion rates through the LMS, and follow up with employees who have yet to complete the training.

Adequate Wage Compliance Reviews

We have defined processes in both our International and North American segments to assess whether our employees receive adequate wages. In our North American segment, formal wage compliance checks are conducted on an (at minimum) bi-annual basis in order to assess compliance with statutory requirements both for salaried and hourly employment contracts. Similarly, in our International segment, formal external wage benchmarking is completed once a year. This process is supported by external providers, and overseen by our Director of Compensation in collaboration with our Human Resources team. Following these assessments, should a necessary wage readjustment be identified, affected employees are notified.

Actioning Direct Feedback on Training and Development Opportunities

The HelloFresh Group encourages employees to take advantage of available learning and development opportunities as per our policies. Our International segment has an intake process, whereby a team or employee can identify a gap or need for training on specific topics. Additionally, there is a central Learning and Development inbox that can be used to raise training requests.

Within our North American segment, appointed Human Resources colleagues schedule bi-weekly meetings to assess any skills gaps being raised by employees. Insights are shared with our Talent and Learning and Development teams to develop reactive or proactive trainings and solutions.

Driving Continuous Improvement on Health and Safety

We strive to remediate negative impacts on our own workforce by driving ongoing progress and best practice in our health and safety (H&S) processes. For example, we conduct annual program reviews in our International segment, and annual safety audits in our North American segment to review our H&S policies, programs, and incidents, and implement corrective actions where needed.

Additionally, we have processes for incident management and reporting to senior leadership in both segments. In our International segment, we have an Operational Excellence Framework (OEF) in place, which includes the development of standardized H&S protocols, enhanced training, and a commitment to risk management through structured H&S audits and compliance reviews. Within the OEF, our International segment's H&S performance is reviewed daily, and feeds into a H&S scorecard that is reviewed monthly by leadership to support in addressing H&S issues. Similarly, our North American segment's Safety team collects all incidents reported by colleagues on-site at our facilities, and aggregates the data in bi-weekly reports that are shared with senior management for review, and for defining any necessary remediating actions.

Targets Related to Managing Material Topics for Own Workforce

As of 2024, the HelloFresh Group has not set formalized Group-wide targets related to our own workforce, however our actions and policies reflect careful consideration of the sensitivities and appropriateness of measures taken for each material subtopic across our operating locations. This allows for flexibility and customization by our local markets' teams and for their employees. We track our Group-wide performance and impacts related to our own workforce against several metrics (see disclosures in "Metrics Related to Own Workforce"), and more qualitatively through employee surveys, ERGs, and engagement with the HelloFresh SE Works Council. We are committed to fostering a safe, inclusive, diverse, dynamic, and equitable workplace for our employees through the actionable policies and programs described in this chapter, and evaluate their effectiveness on an ongoing basis.

We will continue to assess the suitability of setting Group-wide targets for our material subtopics in 2025 and onwards. For instance, for H&S, the HelloFresh Group is working on finalizing a three-year strategy, which will include targets. We strive to disclose these in 2025.

Human Rights

One of our central commitments at the HelloFresh Group is to promote and respect human rights in the context of our business activities. We understand our responsibility to uphold human rights in our own operations and supply chain as an integral part of our business and corporate policy.

In this subchapter, we outline our approach to the management of human rights and prevention of risks in line with our strategy.

Policies Related to Human Rights in Own Workforce

Our [Code of Ethics](#), [Ethical Trading Policy](#), and [Human Rights Statement](#) outline our overarching commitment to respect the human rights of those within our workforce, and set out our strategy to address this material topic and mitigate potential impacts.

Taking Action on Human Rights in Own Workforce

Ethical Trading Basics Training

In 2024, we continued the roll out of our Ethical Trading Basics Training to employees in key departments relevant for the implementation of our human rights strategy (Procurement, Food Safety and Quality Assurance, HR, Sustainability, Legal, Compliance), as well as to all management. This training aims to raise awareness of protected human rights and our approach to mitigate risks. The training consists of two e-learning modules developed for the HelloFresh Group, including explanations on relevant protected human rights and our human rights strategy.

General Discrimination and Harassment Prevention Training

To address the risk of unequal treatment and discrimination, we have developed and rolled out a deep-dive discrimination and harassment prevention training to all employees. The training consists of an e-learning module explaining the different forms of discrimination and harassment, typical examples, and guidance on how to respond to concerns and violations including information on our grievance mechanism and other engagement channels. By the end of 2024, 4,335 employees had completed the training.

Discrimination and Harassment Prevention Training for People Managers

In addition, we created a dedicated training for people managers outlining our expectations on how to prevent discrimination and harassment and providing clear expectations and guidance on how to respond to violations and concerns that are raised by employees. This training has been rolled out Group-wide to all employees with personnel responsibilities. We have also created a toolkit for people managers including guidance on the appropriate handling and escalation of incidents to the respective local HR teams who are responsible for reviewing any concerns. By the end of 2024, 2,180 employees had completed this training.

Human Resources Training on Investigations of Discrimination and Harassment Concerns

The trainings described above were complemented by several workshops with responsible Human Resources (HR) colleagues and Employee Relations teams to reinforce our remediation process, with a focus on the handling of discrimination and harassment concerns.

Enhancement of Grievance Mechanism and Remediation Process

To support our increased focus on discrimination and harassment prevention, we reviewed our [grievance mechanism](#) and remediation process in 2024. This resulted in several adjustments to our remediation process including requirements regarding the timeline for the handling of discrimination and harassment concerns and additional guidance on the development and implementation of corrective and preventive actions. In addition, we reviewed language barriers regarding our grievance mechanism. To enhance accessibility, we complemented our communications on our grievance mechanisms in our facilities and hubs with additional languages using posters with QR codes. Our process to identify corrective action in the case of identified potential negative impacts is described in disclosures under ["Processes to Remediate Negative Impacts on Own Workforce"](#).

Enhancement of Compliance Case Management

We implemented a new compliance case management system in 2024, which allows us to more efficiently handle concerns raised through our different reporting channels and track additional metrics such as information on vulnerable groups affected and protected characteristics relevant in the context of discrimination and harassment concerns. This will help us to better understand trends, identify potential risks for affected groups and legally protected rights, and take more targeted remedial measures if necessary.

Diversity, Equity, and Inclusion

Policies Related to Diversity, Equity and Inclusion in Own Workforce

Below, we describe the DE&I principles included in our Code of Ethics and Employee Handbook, to demonstrate how they support the management of our material DE&I-related impacts and risks. We focus our disclosure on our Group-level Code of Ethics, as well as on our Employee Handbook, which applies to our US operations, given that these policies cover significant portions of our own workforce. Smaller markets may additionally have their own specific policies which support the principles set out in our Code of Ethics, for example on anti-discrimination, anti-harassment, and bullying.

Code of Ethics

Our Code of Ethics sets our Group-wide standard regarding non-discrimination and harassment and outlines our commitment to an inclusive culture and work environment. Our Code takes a strict stance on prohibition of any form of discrimination, including based on racial and ethnic origin, skin color, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national extraction, or social origin. It is complemented by the local policies detailed below.

Employee Handbook

The Employee Handbook for HelloFresh US and all its subsidiaries is an example of how local markets apply our Code of Ethics. In line with the Code, the Handbook outlines our specific policies relating to, for example, equal employment opportunity, anti-harassment and non-discrimination, accommodation of disabilities, pregnancy, and other conditions. The Handbook prohibits any form of harassment and discrimination.

Employees are required to review and confirm their acceptance of the Handbook upon joining HelloFresh US, and it is made available electronically via e-mail and on our internal company portal. The Senior Vice President of People for our North American segment is accountable for the implementation of this policy.

Taking Action on Diversity, Equity and Inclusion in Own Workforce

We are committed to maintaining a strong focus on DE&I at the HelloFresh Group, and understand that there is always progress to be made. We continuously revisit the foundations of our DE&I strategy, identify challenges and opportunities, and launch new initiatives to bridge the gaps. Actions implemented to address DE&I topics are informed by our internal strategic objectives, which are developed using data such as insights from employee surveys and other feedback tools, industry studies, and internal expertise.

We have dedicated roles for DE&I that lead targeted projects for their respective entities – some of which are described below. This is in addition to the resources allocated to our ERGs, who each have executive sponsors as well as financial support from the HelloFresh Group. Other functions, such as our Ethics and Compliance team, may equally run DE&I initiatives, such as the anti-harassment training, in consultation with our DE&I colleagues.

In 2024, we launched several new initiatives to support our work in this area. For reporting purposes, we have grouped these into the themes of Leadership and Training, Recruitment, and Communications, and focused on those with a wider scope. Several additional local projects and campaigns were led by our ERGs and DE&I colleagues across the HelloFresh Group in 2024.

Leadership and Training

At our HelloFresh SE entity[26], we launched our Women in Leadership Framework in May 2024 with the aim to maintain a scalable, dynamic framework across three pillars: attract, retain, and promote. The framework identifies key drivers for, and barriers to, achieving gender diversity and cross-functional projects to address these. By launching this framework, we aim to increase gender diversity at leadership levels. We will conduct bi-annual revisions to monitor and improve the framework.

As part of our Leadership Essentials optimization project in our International segment, we also developed an e-learning DE&I module for managers, enabling them to create and sustain an inclusive team culture within the context of the HelloFresh Group. This initiative was implemented in September 2024.

In addition, a discrimination and harassment prevention training was rolled out in 2024, as described in disclosures under "Taking Action on Human Rights". The training explains different forms of discrimination and harassment, providing typical examples including a number of DE&I-specific issues. It also offers guidance on how to respond to concerns and violations, including information on our grievance mechanism and other engagement channels.

Recruitment

We encourage our recruitment teams to explore alternative recruitment channels, and to have a diverse pool of candidates from the beginning of the recruitment process in order to mitigate unconscious bias. This proactive approach is key to enhancing diversity within our recruitment funnel, ultimately increasing our chances of cultivating a workforce that accurately reflects the demographics of the general population, and for optimizing talent.

We track and assess the impact of our DE&I recruitment efforts using internal DE&I representation metrics, such as the percentage of women in Associate Director positions or higher, and with objectives to guide our progress. Establishing bias interruption and mitigation processes for hiring and promotions, as well as prioritizing the recruitment of talent from underrepresented groups[27], forms a key part of our approach to this topic. We also recognize the critical role that data plays in monitoring our efforts towards our diversity and inclusion objectives, and as such, we have incorporated diversity and inclusion data into our core people data products. This data is reported to our C-level executives on a quarterly basis.

Communications

We launched targeted inclusion campaigns across our business in 2024, to elevate diverse voices and increase the sentiment of inclusion. For example, we conducted a Group-wide 'Voices of Inclusion' campaign in October 2024, which took place as part of our broader Diversity Month activities. The objective of the campaign was to drive inclusion among employees, especially diverse employees, by empowering them to share their thoughts and lived experiences, as well as to educate and elicit empathy in allies.

Other activities as part of our Diversity Month included asking for employees' insights across the HelloFresh Group via a question posed each week on themes related to core topics that emerged from the DE&I survey results. Topics included Harassment & Discrimination Awareness, Strength in Diversity, Inclusive Leadership, and Embracing Authenticity. Answers were shared through internal communication channels, and on a dedicated landing page on our internal company portal. At HelloFresh SE, we hosted a live panel discussion with representatives from diverse groups covering the key themes in the campaign.

Ultimately, we will assess the effectiveness and success of our communications, and the rest of our work associated with our roadmap, through our annual DE&I survey. We hope to see continued increase in the sentiment of inclusion amongst all of our employees, and particularly those in underrepresented groups at HelloFresh.

Training and Skills Development in Own Workforce

'Learning Never Stops' is a core value at the HelloFresh Group: we are dedicated to fostering and supporting the ongoing professional development of our employees. This commitment is evidenced through key policies and programs that prioritize growth and development opportunities across all levels of the organization.

In this subchapter, we disclose our policies, processes, and actions to manage the training and skills development of our employees, and report on relevant metrics.

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[26] HelloFresh SE is our Group Headquarters, located in Berlin, Germany. Headcount for HelloFresh SE on 31.12.24 was 1,543.
[27] Underrepresented groups for the HelloFresh Group include women and people identifying as non-binary.

Policies Related to Training and Skills Development

To support our commitment to fostering continuous growth and professional development across our global workforce, we have established tailored Learning and Development policies for our employees across markets. The policies include providing financial and structural support for employee-led training and development initiatives, and they share a unified purpose: to enable employees to pursue learning and development opportunities aligned with our ethos of 'Learning Never Stops'. Each policy applies to specific groups of employees based on regional and employment conditions.

The Senior Vice President of People has overall accountability for the implementation of these policies. Our Learning and Development policies are introduced to employees during onboarding and remain accessible through internal company platforms, ensuring transparency and ease of reference.

Taking Action on Training and Skills Development of Own Workforce

We have several dedicated teams across our markets and segments that work to develop and improve the training and career development opportunities offered to our employees, and that lead the actions and initiatives described below. Each segment has dedicated resources for this, and individual teams and employees are able to request funding for learning and training opportunities. By providing resources dedicated to the training and development of our employees, we reduce the likelihood of contributing or causing negative material impacts on our own workforce, and increase the likelihood of positive impacts arising from these measures.

Global Learning Management System Integration

In 2024, the HelloFresh Group successfully implemented and launched a new Learning Management System for learning and development across the HelloFresh Group. The 360 Learning Management System ("360 LMS") will enable us to collect our learning and development data, and will be used to understand our overall engagement and thus inform future actions. Employees can use the 360 LMS to give feedback on the specific learning pathways and content provided to them. This feedback is then reviewed by the Learning and Development team, which holds ultimate accountability for developing our learning content accordingly. We are currently in the process of promoting the 360 LMS and enabling an effective roll out.

Implementation success is measured by the number of employees we have logged into the 360 LMS. We aim to further expand access to this system in 2025 and beyond by including employees in our facilities and logistics hubs.

Future Leaders

In 2024, we welcomed a new cohort of program participants to our annual Future Leaders Program. This program aims to recognize, nurture, and connect top talent within the HelloFresh Group. Participants join for a two-year period and benefit from tailored learning opportunities and exclusive networking events. In addition, we held our global Future Leaders summit over two days in New York and Berlin in 2024.

We hold monthly review meetings and twice-yearly executive steering committee meetings to assess the engagement and success of the program, and to ensure that it also supports the strategic direction of the HelloFresh Group. We collect data and feedback from participants that link to the program's outcomes, and build this into the annual review of the Future Leaders Program.

Leadership Essentials Program

In 2024, we optimized our existing Leadership Essentials Program, a course on transformational leadership and creating shared team visions, to enable participants to access the program autonomously through our digital 360 LMS. We broadened access to the program, making it available to all HelloFresh leaders globally, thus offering more career and skills development opportunities. Leadership content topics can be selected or assigned based on individual development plans.

As mentioned in disclosures included under ["Actioning Direct Feedback on Training and Development Opportunities"](), the 360 LMS provides employees with the opportunity to provide feedback and to rate course content, and this also applies to the Leadership Essentials Program. We hold quarterly review cycles (or as company changes require content to be updated) with business leaders to ensure the content meets the needs of the company.

Mint Mentoring Program

We continued to make our Mint Mentorship Program available to our International segment's HelloFresh employees, as well as our Global Tech team in 2024. The Mint Mentorship Program aims to promote knowledge and skills sharing, provide opportunities for senior employees to develop leadership skills, create spaces for role models from traditionally unrepresented groups, and enable productive relationships through a proactive learning culture. The program was conducted three times in 2024.

Every program we deliver requires both our mentors and mentees to provide feedback on the effectiveness and the impact that the mentoring program has had. We use this information to review and make adjustments to every new program, where appropriate.

Health and Safety

At HelloFresh we have a duty of care to our employees to ensure everyone goes home as healthy and safe as they came in to work. We continue to strive towards our safety vision of a 'safety-first workplace' through strong leadership, robust processes, a positive safety culture, data insights, and employee engagement. Our operations face a diverse number of potential health and safety impacts associated with manufacturing and logistics, including workplace transport, ergonomics, chemicals (including gases), working at height, operating machinery, driving, and slips and trips. Our health and safety management systems, which are used to manage, record, and track risks and incidents, cover 100% of our own workforce.

Every market has a dedicated Health and Safety (H&S) team who support them in managing potential impacts, monitoring and reporting on performance, taking action as required, and training local teams.

We allocate the necessary resources to manage H&S, including dedicated management personnel, specialized engineering teams, continuous process improvement initiatives, and technology. Specifically related to H&S incident prevention, financial resources are allocated to trainings, hazard prevention programs, and operational risk management.

Policies Related to Health and Safety of Own Workforce

The HelloFresh Group has several policies in place to drive a risk-based approach to H&S to minimize the risk of harm to our people, the risk of workplace accidents, and promote a positive H&S culture. All of our relevant H&S policies are accessible to team members via the HelloFresh Group internal company portal, and are also communicated to new employees through safety orientations.

Health and Safety Policy Statement (International)

Our Health and Safety Policy Statement is our International segment's workplace accident prevention policy, and covers our six foundation principles as a commitment to safeguard our employees, customers, and the environment through rigorous safety standards and continuous improvements. These principles are:

- Leadership Commitment
- Robust Processes
- Safety Culture
- Data Insights
- Employee Engagement
- Continuous Improvement

The scope of this policy is limited to our International segment. Our Chief Operating Officer approves and maintains organizational responsibility for the policy.

As well as being accessible through our internal company portal, the policy is communicated to all of our International segment's H&S leads. The policy was developed in alignment with relevant local health and safety requirements. We collect input from market stakeholders, auditors, and risk management professionals to continually adapt the policy, and to align with operational priorities, regulatory standards, and safety needs. Our International segment is currently working on aligning this policy to third-party health and safety standards.

Safety Policy and Standards Governance Policy (North America)

Our governance policies for the US and Canada (Safety Policy and Standards Governance for the US, and Occupational Health and Safety Policy Statement for Canada), define the structures, responsibilities, and procedures to promote a safe working environment while addressing regional regulatory requirements. They therefore act as our workplace accident prevention policies.

The above-mentioned policies apply to all HelloFresh operations in the US and Canada, outlining the standards and commitments required to maintain workplace safety. Both policies ensure compliance with Occupational Safety and Health Administration (OSHA) standards, alongside federal, state, provincial, and local regulations.

In the US, the policy is approved by the Senior Vice President of People with implementation oversight delegated to the Head of Safety and Security. In Canada, the policy is formally endorsed by the CEO of HelloFresh Canada, with shared responsibility among management, workers, and the Joint Health and Safety Committee (JHSC) for enforcing safety standards and ensuring compliance.

Taking Action on Health and Safety of Own Workforce

Through the implementation of our H&S policies described above, we strive to avoid any workplace incidents at our facilities and offices. Additionally, we implemented several proactive actions in our International and North American segments to improve our prevention of workplace accidents, as well as our H&S management systems. These are described below.

Monthly Health and Safety Reporting

The HelloFresh Group migrated to a global monthly health and safety reporting process in January 2024, which captures key metrics such as Lost Time Injury Frequency Rate (LTIFR), corrective actions implemented, and incident trends to support real-time risk management. Our H&S teams collate data across all markets for consistency. Through this process, our International and North American H&S teams also apply a 'four eyes principle': all material risks are reviewed and data is verified for completeness and accuracy. Having a single, centralized H&S database supports improved global understanding of health and safety trends as well as risk analyses, and thereby informs the development of global safety policies, and preventative actions.

Ongoing Development Problem Solving and Accident Investigation Training

In 2024, the HelloFresh Group's International segment continued to progress on the ongoing development of the Problem Solving and Accident Investigation Training program for our local H&S leads. The program is based on a 'train the trainer' methodology, and aims to equip H&S teams across the International segment with the tools and skills to conduct root-cause analyses on high potential incidents, and implement corrective actions. The program is therefore expected to increase our resilience as a learning organization and mature our culture of safety throughout the HelloFresh Group. The initial roll out of this training program commenced in November 2024 and is expected to continue into 2025.

Safety Observation Program

Our Safety Observation Program was implemented in 2021 by our North American segment to strengthen proactive safety measures and improve overall workplace safety culture. As part of the program, floor managers at our facilities complete safety observations four times per work week. During observation sessions, each manager dedicates time to identifying safety concerns, enabling them to proactively mitigate risks. Data collected from observation sessions is analyzed at both site- and global-level to detect trends, enhance safety culture, and prevent future incidents.

The program is supported by both labor resources and our Health and Safety Management Program, which allocates dedicated time for operational leaders to complete the safety observations. Additionally, the program is backed by a budget that includes training, safety tools, and technology to track and analyze the collected data.

Effectiveness is tracked through a centralized system. We monitor key metrics such as the number of observations completed, the types of hazards identified, and the resolution rates for corrective actions. Regular reports are generated to assess the program's impact on reducing incident rates, and on improving our safety culture.

In-House Treatment Program

In our US operations, we continued to offer immediate care in 2024 through our in-house treatment program for all work-related injuries. By providing treatment in our on-site clinics, combined with our in-house Health and Safety

Management program, we can give our employees a prompt medical diagnosis and care, facilitating faster recovery. We pride ourselves on focusing on immediate care, along with an increased emphasis on prevention and the timely reporting of workplace incidents.

Partnership with the British Standards Institute

In 2024, our International segment's H&S team continued their partnership with the British Standards Institute (BSI) Group, an international market leader for standards and certification, to assess the effectiveness of our H&S management systems and risk controls. This collaboration enables our International segment to apply external assurance to our processes, while strengthening our systems through site-based management action plans as part of our ongoing health and safety strategy.

Metrics Related to Own Workforce

Employee Characteristics

Definition of an "Employee" of the HelloFresh Group

We define "employees" as workers who are employed directly by the HelloFresh Group and its entities on a permanent or limited term basis. Our employee count therefore includes temporary, non-guaranteed[28], and permanent employees that are contracted by our undertaking.

Total Number of Employees by Gender

Below, we present our total headcount as of 31.12.2024, split by gender.

	2024
Total	**21,138**
Male	11,528
Female	9,129
Others/Not Reported	481

Number of Employees by Country

The table below provides the number of employees in countries where the HelloFresh Group has 50 or more employees, and that represent at least 10% of the total number of employees as of 31.12.2024.

Country	2024
Germany	3,521
United States	8,807

Total Number of Employees by Contract Type

The figures presented below break down our headcount by gender, region, and employee type. These figures represent the headcount as of 31.12.2024.

	2024			
	Female	**Male**	**Other/ Not Disclosed**	**Total**
Number of employees	**9,129**	**11,528**	**481**	**21,138**
Number of permanent employees	5,519	7,356	342	**13,217**
Number of temporary employees	421	879	13	**1,313**
Number of non-guaranteed employees	3,189	3,293	126	**6,608**

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[28] Following the definition provided in the CSRD's ESRS S1 standard, application requirement 56, non-guaranteed hours employees are employed by the HelloFresh Group without a guarantee of a minimum or fixed number of working hours.

Employees That Have Left the HelloFresh Group

	2024
Number of employees that have left the HelloFresh Group	12,254
Rate of employee turnover	55.0%

For the metrics "Number of employees that have left the HelloFresh Group" and "Rate of employee turnover", we have included all employees in all facilities, offices, and locations who have left voluntarily, involuntarily, or due to retirement and natural contract expiration.

The rate of employee turnover was calculated by dividing the total number of exits from the HelloFresh Group by the average employee headcount during the 2024 reporting year. The turnover rate is calculated for the entire employee base (both white-collar and blue-collar roles), and is historically higher in operational facilities, in particular our meal-kit pick-and-pack centers.

Metrics on Collective Bargaining Coverage

Percentage of Employees Covered by Workers' Representatives

	2024
Employees (in the EEA) covered by workers' representatives	51.0%

Overall Percentage of Employees Covered by Collective Bargaining Agreements

	2024
Employees covered by collective bargaining agreements	23.0%

To calculate the metrics on collective bargaining coverage above, each country of operation was assessed for coverage of its own workforce by workers representatives and collective bargaining agreements. Where a location had coverage by workers' representatives and collective bargaining agreements, all respective employees were considered as covered. The number of employees used to calculate both figures are as of 31.12.2024.

Social Dialogue

We do not have agreements with our employees for representation by a European Works Council. Our employees at our HelloFresh SE entity do, however, have a German Works Council in place.

Metrics on Human Rights

Below, we present figures related to human rights in our own workforce. All HelloFresh Group entities, employees, other workers in our own workforce, facilities, and countries of operation are included in these metrics. For each metric, we define the terms that are important to understanding our approach to calculation.

Total Number of Incidents of Discrimination

In 2024 we recorded 336 incidents of discrimination. Included in the figure are all incidents and allegations of discrimination that we have identified through legal actions filed, notifications by authorities, our grievance mechanism, or other established processes to detect incidents. Incidents included above are those that arise out of, or in, the course of working at the HelloFresh Group. All employees and operating locations are included in the calculations.

We define discrimination as the less favorable treatment of an employee in comparison to others in a similar position, including any forms of harassment, on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or any other relevant forms.

Total Number of Complaints Filed through Channels Available to Own Workforce

In 2024, we recorded 790 complaints filed through channels for people in our own workforce to raise concerns. Any report or claim made by employees or other stakeholders in our own workforce regarding ethics and compliance violations in our own operations, or about our ethics and compliance policies and procedures reported through our grievance mechanism, are included in the figure above.

Total Number of Complaints Filed through National Contact Points for OECD Multinational Enterprises

All complaints filed in the reporting year to OECD National Contact Points (NCPs) in the 18 countries where the HelloFresh Group's entities operate are included in this metric. However, it is important to note that though our operations in the Philippines are within scope of this metric, there was no corresponding NCP in 2024, and therefore it was not possible to obtain data. In 2024, 0 complaints were filed to OECD National Contact Points regarding the HelloFresh Group.

Total Amount of Fines, Penalties, and Compensation for Damages for Complaints and Incidents of Discrimination

In 2024, the HelloFresh Group paid €0 for material fines, penalties, and compensation for damages as a result of violations regarding social and human rights factors. This includes penalties, fines, and compensation for damages relating to breaches and violations of laws, regulations, or voluntary commitments on labor rights and fundamental human rights including discrimination and thus corresponds to the material amounts paid for the incidents and complaints reported above.

Total Number of Severe Human Rights Incidents Connected to Own Workforce

In 2024, the HelloFresh Group had 0 severe human rights incidents connected to our own workforce. We define severe human rights incidents as significant adverse events related to our operations and value chain that result in the violation of fundamental human rights, in negative impacts on our employees and other workers within our own workforce, that are irreversible or very challenging to remediate, and which affect a significant number of individuals. In the context of this chapter of the report, the scope of this metric is limited to our own employees.

Total Amount of Fines, Penalties and Compensation for Severe Human Rights Incidents Connected to Own Workforce

In 2024, the HelloFresh Group paid €0 for material fines, penalties, and compensation for damages as a result of severe human rights issues and incidents connected to our own workforce. This metric thus corresponds to the amount of material fines, penalties, and compensation paid for the incidents reported above.

Metrics on Adequate Wages

Two metrics related to adequate wages are presented below. For our countries of operation within the EEA, we define adequate wage in line with Directive (EU) 2022/2041 of the European Parliament and of the Council on Adequate Minimum Wages in the European Union. For our countries of operation outside the EEA, or for countries within the EEA with no applicable minimum wage, we primarily based our thresholds on adequate wage levels provided on government websites, European Union or country-level statistics, official workers' unions resources, and if these were unavailable, other online sources.

In 2024, no employees (0%) were paid below the applicable adequate wage benchmark in their respective country.

Health and Safety Metrics

We use the metrics presented below to track the performance of our health and safety actions and policies. All operating countries, facilities, and offices are within scope and included in the calculations. Where primary data is not available, as is the case for some of our offices, we use estimations based on data for similar locations.

	2024
Number of fatalities in own workforce as result of work-related injuries and work-related ill health	0
Number of fatalities as result of work-related injuries and work-related ill health of other workers working on the undertaking's sites	0
Number of recordable work-related accidents for own workforce	296
Rate of recordable work-related accidents for own workforce	6.5
Number of cases of recordable work-related ill health of employees	0

Definition of Work-Related Injuries, Fatalities, and Ill Health

We define work-related injuries and ill health as those which result from failures in our processes, the manner in which the task or work in question was structured, executed or overseen, as well as issues with our machinery, equipment, or on-site conditions. An injury, fatality, or case of ill health that occurs at an external site while an employee was conducting work on behalf of the HelloFresh Group would also be considered as work-related.

Fatalities as Result of Work-related Injuries and Work-related Ill Health

Within this metric's scope are all fatalities which occurred due to work-related injuries or ill-health at our sites.

Work-related Accidents for Own Workforce

To calculate the "Number of Work-related Accidents for Own Workforce", we sum the number of lost-time incidents (LTIs) that have been recorded in our health and safety management systems. We define LTIs as work-related injuries which result in the injured parties being unable to attend work.

Rate of Recordable Work-related Accidents for Own Workforce

For the "Rate of Recordable Work-related Accidents for Own Workforce", we multiply the number of LTIs (see above) by one million, and divide by the total hours worked by all employees. The majority of total hours worked is based on actual time registration data in our facilities, and a limited share is estimated based on the number of contractual working hours. We use the multiplier of one million to standardize the rate to reflect the number of incidents per 1,000,000 hours worked.

Cases of Recordable Work-related Ill Health of Employees

To calculate the "Number of cases of Recordable Work-related Ill Health of Employees", we sum the number of cases of work-related ill health recorded in our health and safety management systems.

Diversity, Equity & Inclusion Metrics

Gender Distribution at Top Management Level

Gender Category	2024	
Male	545	64.2%
Female	302	35.6%
Others/Not reported	2	0.2%
Total	**849**	**100.0%**

At the HelloFresh Group, we define "top management" as any employee that is at minimum a Head of Department (Associate Director), and at maximum a member of the Management Board. The values presented above are as of 31.12.2024. All employees (hourly and salaried), are included in the calculation.

Distribution of Employees by Age Group

Age group categories	2024	
Under 30 years old	2,774	31.8%
Between 30 and 50 years old	5,441	62.4%
Over 50 years old	511	5.9%
Total	**8,726**	**100.0%**

The values presented above, split by age group, are those for salaried employees as of 31.12.2024. We will work to expand the scope of the metric to include all employees in 2025.

For our definition of employee and our approach to headcount calculations, please see the subchapter "Employee Characteristics".

Training and Skills Development Metrics

The HelloFresh Group is committed to ensuring our employees utilize the learning and development opportunities made available to them. To highlight and improve these opportunities, we measure the metrics presented below.

Average Number of Training Hours per Employee

	2024
Average number of training hours per employee	2.1

Until mid-2024, our International and North American segments used separate learning management systems, and calculated the training metrics above differently, as explained below. In 2024, we merged to a centralized platform – our 360 LMS. The metric therefore captures the average number of training hours per employee in 2024 from all LMS that were in place. Several live, instructor-led trainings also occurred, however these are not captured in the metric for 2024 for our International segment. Our International segment's Learning and Development team is currently setting up a process to collect these offline training hours, and will include them in our 2025 reporting.

For our International segment, the metric was calculated using the total number of hours spent by salaried[29] employees in our e-learning platforms in 2024 across all International markets; hourly[30] employees are excluded from the metric's scope, given that they typically do not have corporate e-mail addresses and thus cannot access our LMS.

For our North American segment, the metric includes both the offline hours from instructor-led trainings (using employee surveys) and e-learning platforms. The metric for this segment is calculated by summing the total number of training hours for employees, divided by the total number of employees at year-end 2024, and it relates to all salaried employees in the North American segment.

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[29] Salaried employees: refers to our employees whose pay is fixed as part of their employment contract.
[30] Hourly employees: refers to our employees whose pay is determined by the actual hours worked.

Workers in the Value Chain

Our Ethical Trading Policy & Human Rights Statement outline our commitment to protect the human rights of workers in our supply chain

Workers in our Value Chain

Policies Related to Workers in our Value Chain

Our [Ethical Trading Policy](#) and [Human Rights Statement](#) outline our overarching commitment to protect the human rights of workers in our supply chain and local communities, and set out our strategy to mitigate risks and address impacts. To address these effectively, our human rights strategy builds on an annual ethical risk assessment to identify risk categories within our supplier base, i.e. supplier groups whose business activities are associated with increased ethical risk. For further details, please see our [Human Rights Statement](#) on our website.

Our [Ethical Trading Policy](#) applies to all suppliers, agents, consultants, and other service providers of the HelloFresh Group and all its subsidiaries. It covers everyone working for, or on behalf of, the HelloFresh Group or our partners, including but not limited to full and part-time employees, as well as temporary workers. The Ethical Trading Policy sets out our expectations towards our partners to uphold fair business practices and respect the rights of their employees.

Our policy regarding suppliers and other stakeholders is integrated into our standard supplier contracts, included in the supplier onboarding process, and accessible for all external stakeholders on our Group website.

Processes for Engaging with Workers in our Value Chain

Our current engagement efforts are focused on our direct suppliers, in the context of implementing our [Ethical Trading Policy's](#) requirements and due diligence to ensure that workers in our value chain are protected from labor and human rights risks.

We use Sedex (Supplier Ethical Data Exchange) as our main provider of ethical assurance for companies within our supply chain. Sedex is one of the world's largest data platforms for ethical supply chain assessments, which allows companies to exchange data with their suppliers and gain greater visibility into their ethical practices. Suppliers submit information on their ethical performance through self-assessments and audits, resulting in a rating of the ethical risk for their facilities and production sites. The information provided offers insights into the demographics of a supplier's workforce, the supplier's individual ethical risk profile, and their management systems to mitigate human rights risks. [Audits](#) are typically conducted based on the SMETA (Sedex Members Ethical Trade Audits) standard, an audit standard provided by Sedex. SMETA audits include engagement (for example, interviews) with a sample pool of workers at a supplier's site, the findings of which are reflected in the audit report and made accessible through Sedex.

Another engagement channel we use is our [grievance mechanism](#), which includes our SpeakUp! platform. Through the SpeakUp! platform, concerns regarding potential human rights-related violations or risks can be raised by any individual within or outside the HelloFresh Group, explicitly including workers in our value chain. The SpeakUp! platform is accessible to value chain workers at all times via a mobile app and web browser, and allows for anonymous reporting if preferred.

Processes to Remediate Negative Impacts and Channels for Workers in our Value Chain to Raise Concerns

We respond to violations of human rights and environmental standards through a systematic and standardized process (described below), and where a breach has occurred, with measures to terminate the violation or mitigate any risks. If we become aware of a potential violation along our supply chains, we first investigate the concern in cooperation with our supply chain partners. If a breach has occurred or is imminent at one of our direct suppliers or within their supply chains, we will work with our partners to take appropriate corrective actions to stop or minimize the extent of the violation, and prevent violations going forward. Depending on the severity of the violation, the actions may also include the suspension or termination of the business relationship.

We are aware that despite great care in the implementation of our prevention program, violations of human rights and environmental standards can occur at our suppliers. Our [grievance mechanism](#) also offers those outside our company the opportunity to report human rights and environmental violations or breaches of the law in connection with our own business activities and the business activities of our business partners, especially our suppliers.

Taking Action on Material Topics Related to Workers in our Value Chain

Ethical Trading Policy

To ensure our suppliers' commitment to comply with our ethical standards, we ask our suppliers in risk categories to acknowledge our Ethical Trading Policy.

Sedex Onboarding and Self Assessments

Newly onboarded suppliers that fall within identified risk categories are required to become a member of the Sedex platform and complete a comprehensive self-assessment questionnaire. The self assessment questionnaire is completed by suppliers at a site-level for their facilities that provide products or services to the HelloFresh Group. An ethical risk rating is determined based on this questionnaire.

Audits

Through the Sedex platform, we prioritize the request of third-party SMETA audits from our high-risk suppliers on a case-by-case basis, which allows us to identify specific impacts and risks at a site level. These audits include a report on findings, if any, as well as a corrective action plan including timelines for rectification.

Ethical Incident Management Process

In 2024, we further enhanced our remediation process for unethical practices of our suppliers. We introduced a dedicated step-by-step framework ensuring a thorough investigation of any concerns regarding human rights incidents within our supply chains and the implementation of corrective and preventive measures where necessary.

Targets Related to Workers in our Value Chain

As of 2024, the HelloFresh Group has not yet set targets related to managing impacts on workers in our value chain. We are, however, measuring and tracking the number of suppliers that have signed our Ethical Trading Policy. Details on our performance against this metric are detailed in the subchapter "Metrics for Workers in Value Chain" below.

Metrics for Workers in our Value Chain

Given that our Ethical Trading Policy details our minimum human rights standards for our own operations and our suppliers, we measure and track the percentage of global suppliers that have signed the policy and thus commit to its adherence. All product categories, brands, and markets are included in the metric.

Suppliers That Have Signed our Ethical Trading Policy

	2024
% of Tier-1 suppliers that have signed our Ethical Trading Policy	65%

The metric above is limited to our direct suppliers, with whom we have direct contractual agreements (known as "Tier-1" suppliers), and reflects suppliers within identified risk sectors. Furthermore, the metric only includes suppliers who have signed the latest version of our Ethical Trading Policy.

Consumers
& End-users

We strive for high standards
of food safety & quality
for our customers, along
with rigorous data privacy
& protection measures

Consumers and End-users

As supported by our DMA results, providing our customers with safe, high-quality food, and with product offerings that support a healthy lifestyle, while also ensuring their data security and ability to freely share their experience with our products and company, are key considerations for us.

Given the wide range of material subtopics that we have identified related to our consumers and end-users, we have split this chapter of the report into theme-specific subchapters. This approach allows us to best demonstrate how our policies, actions, and processes specifically address the material subtopics that we have identified through our DMA, and to organize our metrics accordingly.

Our disclosures on the material subtopics identified related to our consumers and end-users are presented in their respective topic-specific chapters:

- Food Safety
- Data Security and Freedom of Expression
- Health and Nutrition

Food Safety

Providing our customers with safe, high quality food is of paramount importance to us. In this chapter, we cover our policies, approach to food safety management, and performance against key metrics.

Policies Related to Food Safety of our Products for Consumers and End-users

This subchapter outlines the policies and processes we have implemented to proactively manage potential food safety impacts and risks within our supply chain and operations. Our approach is based on a rigorous supplier management process, which addresses upstream risks through thorough vetting, continuous monitoring, and adherence to established safety standards. By maintaining strong communication channels and detailed reporting requirements, we aim to identify and address potential food safety issues early in the supply chain.

Within our own operations, we strive to maintain quality and safe products through our Food Safety & Quality Programs. These programs outline how each HelloFresh site controls risk and assures the quality attributes of the products or product groups and their associated processes. They incorporate Hazard Analysis and Critical Control Points (HACCP) principles, prerequisite programs, as well as verifications and validations. We use process control methods to manage and optimize production processes to improve efficiency, product quality, and to reduce waste. The HelloFresh Food Safety & Quality programs were created utilizing the most current regulatory guidance, SQF[31]/BRCGS[32] code, industry best practices, and relevant academic literature to address all potential food safety hazards.

Our policies are stored centrally on our internal company portal, and are thus readily accessible for relevant teams such as Food Safety and Quality Assurance (FSQA), Operations, Customer Care, and Procurement. A full review of the documented and implemented policies is conducted when required, or when changes occur that may affect product quality or food safety.

International Food Quality & Safety Policy

Our Food Quality & Safety policy is central to our commitment to safeguarding consumer health and delivering products that meet the highest standards of quality and food safety. It defines clear expectations for food safety across our value chain – from farm to fork – ensuring every step, from sourcing to delivery, meets stringent standards.

The policy also prioritizes risk management and compliance with verified external standards, such as BRCGS, GLOBALG.A.P.[33], and GFSI[34]. We believe that maintaining the highest food safety and quality standards is a shared responsibility, with engagement from employees, suppliers, and partners to uphold these priorities at every level.

The responsibility for upholding this policy lies with both our upstream and downstream Chief Operating Officers. The policy applies to all of our International segment's facilities, locations, brands, and employees.

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[31] SQF: Safe Quality Food (SQF) is a food safety standard recognized by GFSI.
[32] BRCGS:British Retail Consortium (BRC) Global Standard specify safety, quality and operational criteria for food producers and suppliers.
[33] GLOBALG.A.P: Global Good Agricultural Practices (GLOBALG.A.P) is a brand of smart farm assurance solutions for the certification of agriculture, aquaculture, and floriculture focused on advancing safer and more responsible agriculture practices.
[34] GFSI: Global Food Safety Initiative.

Food Safety and Quality Assurance – Supplier Approval Procedure Policy (International)

Our International segment's Supplier Approval Policy details the expected process for supplier approval within our FSQA team, which involves reviewing food safety of our suppliers prior to approval to mitigate food safety risks in our products. This process applies to all current and future suppliers of the HelloFresh Group for our meal-kit brands across all markets; however it excludes our US operations and associated brands given that they have their own Supplier Approval Procedure Policy in place. The process applies to all food suppliers, manufacturers, agents, brokers, wholesalers, and third-party storage providers, and is applicable to both HelloFresh- and private-branded products.

To develop the policy, we engaged key stakeholders – internal teams, industry bodies, and regulatory authorities – gathering insights to align with both international and local standards. Our approach established clear, fair criteria that support compliance while addressing industry-specific needs, particularly prioritizing food safety and quality. We maintain transparent communication to keep stakeholders informed of compliance requirements, and actively incorporate their feedback to support continuous improvement.

The procedure sets out our requirement for all suppliers' sites to have obtained GFSI approved certification, including BRCGS Global Food Safety Standard, International Food Standard (IFS), and Food Safety System Certification (FSSC) 22000. Accountability for this procedure sits with our Chief Operating Officer.

Food Safety and Quality Assurance - Supplier Approval Procedure Policy (North America)

Our US and Canadian markets have separate Supplier Approval Compliance Programs. The principles and procedures are aligned across both markets, ensuring consistency in supplier evaluation and compliance. These policies describe the expected process to select, evaluate, approve, and monitor suppliers within our North American segment's FSQA team.

The processes outlined in the policies involve the review of food safety certifications (GFSI or equivalent) and/or compliance with FDA and/or USDA regulations for our consumables suppliers, any undertaking with whom we have food-related brand partnerships, as well as our co-manufacturers, with the aim of mitigating food safety risks. Holding these food safety certifications is mandatory for these suppliers to be approved by our FSQA teams. The Director for Quality and Food Safety, Suppliers and Operations has responsibility for this policy.

Serious Food Safety Complaint Policy

Customer complaints represent one of the key information sources for any food safety management system. Our Serious Food Safety Complaint Policy provides a framework for handling serious food safety complaints and remediating any impact on consumers. It applies to all International HelloFresh brands, excluding brands connected with our US market. The Head of Food Safety & Quality Assurance (FSQA), Procurement and Customer Care and Operations have accountability for the implementation and governance of this policy.

Processes for Engaging with Consumers and End-users on Food Safety

We primarily engage with consumers through our voluntary feedback and customer service channels, via our websites, social media accounts, and apps, which are available to consumers at all times. Food safety and quality-related engagements typically occur post-sale and during delivery of our products to customers. As described in the disclosure on channels for consumers and end-users to raise concerns, each food safety-related complaint is reviewed by our FSQA teams to assess severity, potential causes, and where possible implement corrective actions to prevent further occurrence. Customer perspectives thus inform future actions aimed at managing actual and potential impacts.

We consider customers that are particularly vulnerable to impacts as those with allergies or food intolerances. We additionally engage with these customers by including clear key allergen labelling (gluten, dairy, etc.) on all recipe cards, in-app, and on our website. Additionally, all ingredients used in recipes and meals are listed, allowing customers to identify any products they may be allergic or intolerant to.

In the case of an identified food safety or quality issue resulting in a product recall, customers are notified through at least one of the following channels: email, app notifications, SMS, or phone call. These channels, as well as the reports made by customers via these channels, are overseen and monitored at several tiers across the organization, with oversight by the Head of FSQA.

Processes to Remediate Food Safety-Related Negative Impacts and Channels for Consumers and End-users to Raise Concerns

Across the HelloFresh Group, food safety concerns can be raised across different avenues including our website chat functions, our customer service phone lines, via our social media channels and our Customer Error Reporting Tool (CERT) for complaints related to missing ingredients and quality issues, while other complaints categories can be raised via our customer care platform.

When concerns relate to food safety, trained customer care representatives fill in the complaint form according to the severity of the complaints. A food safety complaint falls under specific categories such as biological, chemical, or physical hazards. Complaints which impact the health or safety of a consumer are then escalated to food safety customer care specialists, who will reach out to the consumer directly to obtain further information.

Our FSQA team reviews each entry and, if needed, further investigates the severity of complaints through a list of requirements (i.e food safety complaints classification, complaint investigation, and root cause analysis).

Each escalation is carefully monitored until resolved by our Customer Care team, who are responsible for updating customers on the outcome of the investigation if they require it, or if their complaint has been escalated, via phone and/or email, in order to assess whether or not they are satisfied with the proposed solution.

If the case is not resolved via live chat, customers can also leave their reviews via the customer care survey provided after every interaction to evaluate and share feedback about their experience or via various platforms such as Google reviews, Trustpilot, Google Play Store, and Apple App Store.

Taking Action on Food Safety of Products for Consumers and End-users

We are committed to safeguarding customers by proactively managing food safety risks and taking opportunities to enhance product quality and safety. Through comprehensive oversight across our supply chain – from supplier onboarding to the certification of our own facilities – we address material food safety impacts that could affect consumer health. Our approach includes taking preventive action to identify and control potential hazards, implementing minimum standards at high-risk points, and conducting weekly internal and Good Manufacturing Practice (GMP) audits to evaluate our actions. Where a specific concern related to food safety is raised by consumers, we follow the procedure outlined in "Processes to Remediate Food Safety-Related Negative Impacts and Channels for Consumers and End-users to Raise Concerns".

We have dedicated teams across our International and North American segments, working in our offices and facilities across markets to assess supplier compliance with our requirements, and carefully inspect the quality of goods that we receive.

Upstream

As outlined in our FSQA - Supplier Approval Procedure Policy, we maintain a supplier onboarding process. This includes approving suppliers' manufacturing facilities by reviewing certifications, asking risk-based questions and auditing suppliers classed as high risk. Where suppliers do not hold an independent GFSI certification, we conduct food safety audits of the production site for due diligence.

Own Facilities

In 2024, we strengthened our commitment to achieving GFSI certification in our own HelloFresh facilities, maintaining both BRCGS and SQF standards across selected sites in our global operations. This year, we successfully certified 19 facilities, including 14 of our International segment's facilities, as well as our Canadian sites, which received the BRCGS Storage and Distribution certification, with most achieving the highest "AA+" rating. For the first time, our sites undergoing their third certification audit participated in unannounced audits. Additionally, 5 US facilities earned Safe Quality Food (SQF) certification, with most obtaining scores above 97 out of 100. Please see our values in "Metrics Related to Food Safety" for our 2024 performance.

Targets Related to Food Safety

The HelloFresh Group does not have Food Safety targets as of 2024. Our FSQA teams do, however, monitor supplier performance, as well as our own sites' performance, on key food safety indicators. Though we have not set quantitative targets for these indicators, we strive to improve performance over time while also monitoring supplier non-compliance. These metrics are reported in the subchapter "Metrics Related to Food Safety".

Data Security and Freedom of Expression

Data privacy and the protection of customer, employee, supplier, and other stakeholder data are vital components of our global operations. As such, we have policies in place and take actions to protect the data we handle, and to ensure that we comply with data protection legislation applicable in the markets in which we operate. These are described in the chapter below.

Responsibility for complying with customer privacy and data protection is shared between the Global Legal Team, which reports directly to the Chief Financial Officer, and our local privacy experts. In most cases, the Global Legal Team provides guidelines, policies, and training, supplemented by local privacy initiatives and a variety of training to suit individual local needs. The ultimate legal responsibility for data privacy compliance lies with the HelloFresh Group General Counsel.

Policies Related to Data Security of Consumers and End-users

Information Security Policy

The objective of our Information Security Policy is to outline the responsibilities of our employees to help safeguard the information we collect, process, and store, and to support compliance with the appropriate regulations. The policy outlines essential guidelines and controls surrounding the secure and appropriate use of digital assets and information across the organization. Its general objectives are to mitigate material risks related to data security, operational integrity, and compliance, while also seizing opportunities for secure digital innovation. The policy covers several critical areas, including Acceptable Use, Access Control and Password Management, Data Handling, Security Policies (Clean Desk, Endpoint Security, and Remote Working), Incident Management and Risk Assessment, Security Awareness, and Policy Exemption Requests.

The Vice President of IT & Security and the HelloFresh Group's General Counsel have accountability for the implementation and governance of this policy.

The policy applies to all employees, consultants, freelancers, and business process outsourcing (BPO) of the HelloFresh Group and its subsidiaries, in all countries. The policy is shared with employees by local HR and Legal teams as required by local legislation, and is available on our internal company portal.

Customer Data Retention and Deletion Policy

Our Customer Data Retention and Deletion Policy establishes the framework for handling, retaining, archiving, and deleting data across the organization. It aims to ensure compliance with legal, regulatory, and business requirements while mitigating risks related to data protection and security. The policy outlines the following key aspects: Data Retention Guidelines, Responsibilities of Data Owners, Data Handling Processes, and Archival and Deletion Protocols.

The policy applies to all who work within the HelloFresh Group as well as third parties who are engaged by the HelloFresh Group for activities within the scope of the policy. The policy applies to all customer data which is collected for the purpose of use within the HelloFresh Group. Anonymized customer data is not covered. The policy was communicated to employees via email upon internal publication, and is since available at all times on our company intranet.

The Director of Global Data Management has accountability for governance and implementation of this policy.

Data Protection Policy

Our Global Data Protection Policy outlines the HelloFresh Group's approach to ensuring compliance with our applicable statutory provisions, including the General Data Protection Regulation (GDPR) and other applicable national provisions on data protection, such as the German Federal Data Protection Act (FDPA).

The policy applies to all HelloFresh Group companies that are subject to GDPR, their employees, and any third parties (contractors, consultants) working with the Group. It also applies to everyone who works at our company, in particular our employees. The policy provides information about the main concepts and principles of data protection law, and the roles and responsibilities for data protection at the HelloFresh Group. The policy also sets out mandatory instructions for data protection. This policy is communicated to employees through various channels, for example during the onboarding of new colleagues, via e-mail or through announcements on our digital Group-wide communication platform, and is available on our internal company portal.

The HelloFresh Group's General Counsel has accountability for governance and implementation of this policy.

Data Protection Incident Policy

Our Data Protection Incident Policy outlines our process for the management of personal data breaches and data protection incidents. The policy also outlines the duties of the Data Protection Officer when handling such incidents. This policy addresses our identified risk of potential non-compliance with our relevant data protection obligations. The policy applies to HelloFresh SE and all its German subsidiaries and is communicated to employees through various channels, for example during the onboarding of new colleagues, via e-mail, or through announcements on our digital Group-wide communication platform. The HelloFresh General Counsel has accountability for governance and implementation of this policy.

Due regard was given to the protection of our customers and employee data in the development of each of the aforementioned policies.

Whilst the human rights of our customers and end-users were considered during our Human Rights Risk Assessment and in the development of our annual Human Rights Statement, we have not identified material risks relating to this stakeholder group connected with our business, and therefore our human rights commitments do not directly address the rights of this group, nor do our policies in this category specifically align with internationally recognized instruments such as the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights of Work, or the OECD Guidelines for Multinational Enterprises.

Whistleblowing Policy

Our Whistleblowing Policy describes the grievance mechanism in place at the HelloFresh Group. The policy is available online at all times, and is accessible to our customers. Through our grievance mechanism and its tools, like our SpeakUp! platform, customers can raise any concerns relating to breaches of regulations, laws, or our Code of Ethics by the HelloFresh Group or its employees. They can do so anonymously, thereby encouraging freedom of expression.

Specifically relating to our products and services, customers can provide feedback directly in-app or on our website through our dedicated customer care channels. Each customer feedback is processed by our Customer Care teams, and where needed corrective actions are taken.

Processes for Engaging with Consumers and End-users about Impacts

The HelloFresh Group provides a number of engagement opportunities for consumers in relation to the potential impacts on their data privacy and protection. Our privacy statement, which includes information from our Global Data Protection Policy, is made available publicly on our website and is accessible to customers at all times. Users are made aware of their rights regarding the use and processing of their data upon creating an account on our brands' apps or websites, and are provided with contact information to direct any objections or requests relating to these rights.

In 2024, we began the implementation of a dedicated data privacy operations platform, which allows users to interact with the HelloFresh Group specifically on their data protection-related queries and requests in a more efficient and streamlined way, directly from their account profile settings. The platform was made available in 2024 in the Benelux and DACH regions, and is planned for implementation across all geographies by the end of 2025. This platform is overseen by our Data Protection Officer.

To monitor effectiveness of this channel, we have objectives in place that track how many requests are processed monthly. We also have time-tracking features in the platform which tell us the due date of the request, and the average time it takes for us to process these requests.

Regarding freedom of expression of consumers, please refer to the corresponding subchapter in our chapter on Food Safety. The channels reported here are the primary avenues through which consumers can openly share their experience with our products and company.

Processes to Remediate Data Security and Privacy-related Negative Impacts and Channels for Consumers and End-users to Raise Concerns

We have a comprehensive process in place as per our Data Protection Incident Policy to remedy a breach if incurred.

Upon identifying a data breach, a structured response process is activated to address and mitigate the breach. This process begins with notifying the Data Protection Officer, executing immediate containment measures, and confirming

the breach. A preliminary risk assessment is then performed to gauge the potential impact, followed by a formal report to executive management and the supervisory authority. If the breach poses a high risk to individuals' rights, affected individuals are notified promptly with details on measures taken to protect them. Throughout the process, the incident is documented, detailing affected data, the actions taken, and any preventative steps implemented prior to and post-breach to improve future security.

An emergency response within the first 24 hours involves isolating impacted systems, securing data, reviewing logs, and protecting storage media. The investigation assesses the extent of exposure, number of data subjects, and potential consequences. If the breach risks significant harm, clear communication is provided to those impacted, detailing protective actions and any mitigation strategies to minimize adverse effects.

Our current risk management framework actively integrates data protection by assessing risks such as unauthorized access, data breaches, and regulatory non-compliance through our risk register. Each data protection risk is evaluated for both its likelihood and impact (inherent and residual), allowing us to prioritize these risks within our broader risk management approach. To mitigate these risks, we apply a suite of preventive controls, including data encryption, access management, and single sign-on (SSO) protocols, which collectively strengthen access security for sensitive information. Additionally, data security policies and procedures are in place to support consistent protection standards. We utilize real-time monitoring and cybersecurity threat detection tools to swiftly identify and respond to any potential data breaches or unauthorized data access incidents. Our Data Breach Response Plan provides a structured approach to managing incidents if they occur. Regular employee training reinforces best practices in data protection, fostering a company-wide culture of security awareness and reducing the risk of human error.

Specifically for concerns raised by customers, please see the detailed disclosure on our [grievance mechanism](#). Our grievance mechanism and its tools, such as our [SpeakUp](#)! platform, are available to all customers. Additionally, customers can raise concerns or give feedback directly about our products and services through our customer care channels, available in-app and on our website, as described in our Food Safety chapter and its corresponding subchapter ["Processes for Engaging with Consumers on Impacts"](#).

Taking Action on Data Security

The HelloFresh Group took a number of preventative actions in 2024 to mitigate data privacy and security risks to our employees and customers.

For example, we implemented a Zero Trust Solution (ZTS) as an additional security measure for users' remote access to key systems. This solution, which includes a VPN layer, provides secure access to sensitive information for employees and other authorized users working remotely. This significantly reduces the risk of unauthorized access, thereby mitigating the potential for data breaches that could affect both employees' and consumers' information. The enhanced security adds an extra layer of protection against cyber threats, improving overall data privacy and compliance. The solution was deployed on all laptops across the HelloFresh Group during 2024 via Mobile Device Management, which assesses whether devices have installed the ZTS, allowing us to follow-up with employees who had not yet installed the software.

Training

We continue to ensure that employees receive ongoing training relating to data privacy and cybersecurity. Employees handling personal data undergo online data protection training with an examination at the end of the training as part of our standard onboarding procedure. Specialized Customer Care agents, who focus on the handling of and response to privacy-related questions, undergo privacy training on a regular basis. Training also encompasses cybersecurity matters as part of our general annual mandatory compliance training. The general compliance training includes an information security module that covers the basics of information security as well as the company-specific policies and best practices. Furthermore, a mandatory annual security awareness training is provided globally to all HelloFresh Group employees who use company-provided devices (laptop, mobile phone) to access any systems, applications, or databases of the HelloFresh Group. Employee participation in these trainings is mandatory, and attendance is monitored. Additionally, our Security team assesses training effectiveness and employee vigilance by running regular phishing simulations.

Vendor Due Diligence

We maintain our vendor due diligence program, which requires any vendors that handle personal data to disclose which personal data is processed, and which technical and organizational measures are put in place to protect personal data. Vendors handling personal data on behalf of the HelloFresh Group are required to enter into respective Data Protection Agreements with us, including standard contractual clauses (SCC) where required.

Where data security incidents were identified during the reporting year, we followed our Data Breach and Response procedure to remediate the incidents.

Targets Related to Managing Data Security

The HelloFresh Group did not have a formalized global target on data security or freedom of expression for the reporting year 2024. Instead, we monitor data security and privacy compliance on a continued basis, including through the expansion of our data privacy platform. Additionally, we assess on an annual basis the number of confirmed cases of data privacy breaches and fines within specific thresholds, as presented in the subchapter "Metrics Related to Data Security and Privacy".

Health and Nutrition

Our mission at the HelloFresh Group is to change the way people eat – forever. Helping our customers save money with every meal, and delivering fresh, high-quality tasty food is a key focus of our business model and strategy.

Accordingly, continuing to innovate our product and product range that is healthy, convenient, and affordable was identified as a material topic. The healthiness component is a relatively new opportunity for the HelloFresh Group, and is the focus of the chapter below.

Given that this is a new strategic opportunity identified for the HelloFresh Group that we are currently investigating, our policies, processes, actions, and targets to leverage this opportunity are not as developed as those for our other material subtopics related to consumers and end-users. We will continue to develop our approaches to this opportunity in the coming years.

Policies Related to Consumer Health and Nutrition

We have not yet developed formalized policies which specifically address increased consumer awareness on healthiness, as this was a new opportunity identified for the HelloFresh Group during our 2024 double materiality assessment.

Processes for Engaging with Consumers and End-users on Health and Nutrition

We have direct engagement channels with our customers, through which we gain insight into their perspectives. These include features in-app and on our website, available at all times, to provide feedback on recipes, as well as dedicated customer care channels. In 2024, we also conducted surveys and studies with selected customer groups. For example, our International segment's Strategic Product Development team completed studies specifically on healthy, convenient, and time-saving food solutions with samples of customers across our different markets. Regarding healthiness, the studies provided our teams with key insights on customer perceptions of our meal-kit offering, improvement areas for our products and ingredients, and how customers define and assess healthiness. For convenience and time-saving insights, we focused on the key contributors to higher cooking times for customers.

These direct engagement channels are supported by analyses conducted on data related to customer interactions with our products, for example their selection of conscious choices, reduced cooking times, or family-focused preferences, as well as recipe order rates.

Processes to Remediate Negative Impacts Related to Health and Nutrition

As described above, we have direct engagement channels through which our customers can contact our teams and provide feedback on the recipes and ingredients that they receive. These channels are available in-app and on our websites.

Each recipe's and meal's performance is assessed on a weekly basis, and negative feedback received through recipe surveys is reviewed by our culinary teams to assess, and where possible, provide solutions for our customers. Additionally, insights from customer feedback, collected through channels in-app and on our websites, are shared with our Product Development teams to inform future product innovations to meet our customers' needs, including healthiness.

Taking Action to Address Health & Nutrition for Consumers and End-users

While our business inherently strives to balance the affordability, convenience, and nutritional value of our meal kits, as mentioned at the start of this chapter, we identified a key opportunity relating to the healthiness of our products in our 2024 materiality assessment. We are cognizant of the fact that 'health' is not a universally established metric and that the components which support a healthy, balanced meal are nuanced on an international, national, and individual consumer level.

We have nevertheless worked throughout 2024 to further develop our recipes' offering towards more conscious choices for our customers. In our International segment, we strengthened our nutrition guardrails for recipes with dedicated nutrition and ingredient claims in recipe tags. These guardrails have been developed following World Health

Organization (WHO) and official national dietary guidelines and regulations, as well as comprehensive consumer insights research on customer preferences. By using both regulatory requirements and customer insights, we can develop products that help satisfy customers and enable them to make conscious choices supporting a balanced diet. Additionally, we launched calorie counts in 2024 for all of our meal kit product category's recipes, supporting customers in making informed decisions.

In our North American segment for our HelloFresh meal-kit brand, a dedicated health and nutrition campaign was launched in March 2024 for National Nutrition Month, which spotlighted recipes recommended by our dietitians. Additionally, across 2024, several filters were introduced to our web-based weekly menu, allowing customers to filter recipes on offer by nutrition parameters like dietary preference, or specific ingredients to be avoided. Our GreenChef brand similarly increased recipe nutrition transparency by introducing "Carb Smart", "Fiber Smart" and "Dairy Free" recipe tags, and by launching a customer-facing Nutrition Standards Guide.

Our teams will continue collaborating to deliver an increased selection of health conscious choices to meet customer demand, and to enhance clear and effective communication towards customers about the nutrition and health benefits of our products.

Targets Related to Nutrition & Health

We have not yet established formal targets relating specifically to this opportunity in 2024, while we continue to assess the appropriate expansion of this concept.

Metrics Related to Consumers and End-users

Metrics Related to Food Safety

GFSI Certified Suppliers

	2024
Suppliers with GFSI food safety certifications	87.1%

The figure above represents the total number of suppliers within scope that have GFSI food safety certifications, out of our total supplier base within scope of this metric.

For our International segment, all Tier-1 suppliers and all markets for the HelloFresh Group's core brands are included within the metric's scope: Australia, New Zealand, Nordics (Sweden, Denmark, Norway), DACH (Germany, Austria, Switzerland), Spain, Italy, France, Ireland, UK, and Benelux (Belgium, Luxembourg, Netherlands). Ready-to-eat brands which contribute to less than 5% of turnover are excluded from the metric.

Similarly, for our North American segment, all Tier-1 suppliers, and all brands which contribute more than 5% of revenue are included within the metric's scope. Where a broker is used, GFSI data for the corresponding manufacturing site is used, in accordance with our Supplier Approval Procedure Policy.

HelloFresh Certified Sites

Our FSQA team strives to improve and maintain compliance to key food safety requirements by holding recognized GFSI certifications across selected HelloFresh sites.

We track our progress against these targets using the metrics presented below on facilities certified under two different food safety certification schemes benchmarked by the GFSI:

- **British Retail Consortium Global Standard (BRCGS):** for our International sites.

- **Safe Quality Food (SQF):** for our sites in the United States and Canada.

Both standards assure the quality and safety of products handled within our operations and in our supply chain.

	2024
Group: Total number of facilities certified under GFSI[1] (BRCGS[2] or SQF[3])	**19**
International: Total number of facilities in EU & ANZ[4] certified under BRCGS	10
US and CA: Total number of facilities in US & CA certified under GFSI (SQF & BRCGS)	9

[1]GFSI: Global Food Safety Initiative
[2]BRCGS: Brand Reputation through Compliance Global Standard
[3]SQF: Safe Quality Food
[4]ANZ: Australia & New Zealand

For HelloFresh International, only sites which have been operational for more than 12 months and produce more than 15,000 meal-kit boxes annually are included in our GFSI/BRCGS assessment; this represents 10 out of 17 of our International market's facilities.

For our US and Canada operations, all of our HelloFresh (meal-kit) and EveryPlate facilities are within scope. Brands which individually contributed less than 5% to Group revenue in 2024, namely GreenChef, the Pets Table, and GoodChop are not within the GFSI/SQF metric scope. Given the limited revenue size and maturity of the ready-to-eat product category in Canada, these facilities will be excluded until 2026.

Metrics Related to Data Security and Privacy

	2024
Number of confirmed cases of data privacy breaches or violations resulting in a warning or dismissal of an employee	1
Number of confirmed cases of data privacy breaches or violations resulting in total fines above 0.01% of HelloFresh Group's revenue	0

We define a data privacy breach as a breach of security resulting in the accidental or unlawful loss, destruction, alteration or unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. The metrics above demonstrate the number of confirmed cases of data privacy breaches or violations that have resulted in a warning or dismissal of an employee, or where the total fines amount to more than 0.01% of group revenue; these two criteria act as materiality thresholds. All HelloFresh markets and brands are included within the scope of this metric. Input on all fines received during the reporting year is collected from our local and global legal teams across the business, requiring key details such as fine amount, issuing authority, and reasoning for the fine.

Governance

Governance

Business Conduct

The Role of the Administrative, Supervisory and Management Bodies on Business Conduct

For further information on the composition of our Supervisory and Management Board, and their roles and responsibilities, please refer to the Report of the Supervisory Board in our 2024 Annual Report.

Business Conduct Policies and Corporate Culture

Code of Ethics

Our core values of integrity, respect, and responsibility are integrated into our daily operations and reflected in our Code of Ethics ("The Code"), which is structured around four pillars: our planet, our people, our community and governance, and our business. The Code establishes our corporate culture, and provides clear guidance on how we expect all employees to help us deliver on our commitments and to uphold our values in their daily work. It is communicated to all employees at the HelloFresh Group during onboarding, and is available on our internal company portal and on our Group website. These efforts are complemented by mandatory training, explained in more detail in the disclosure on our business conduct training below.

Compliance at the HelloFresh Group is managed by our Global Compliance function, together with Local Compliance Officers. Their work includes training on compliance and ethics, along with other duties regarding policy management, reporting on and investigating ethical concerns, and managing general communications around the topic. The Global Compliance function reports directly to the Chief Financial Officer, and our Management Board takes overall responsibility for this topic.

Identifying, Reporting, and Investigating Concerns about Unlawful Behavior or Behavior in Contradiction of our Code of Ethics

Potential violations of applicable laws or ethical standards set out in our compliance policies, including our Code and Ethical Trading Policy, are identified and reported by individuals through our grievance mechanism. Our grievance mechanism is available for both internal and external stakeholders to report violations of our policies. The investigation of reports of unlawful behavior, or behaviors in violation of our ethical standards, follows an internally standardized process. We do not have other procedures beyond those stipulated in the EU Whistleblowing Directive[35] to investigate business conduct incidents.

Protection of Whistleblowers

An effective grievance mechanism which ensures the protection of whistleblowers is an essential requirement for upholding our ethical core values in our business activities. It enables us to identify and respond to possible misconduct swiftly and prevent violations going forward. As such, we take any reports of concerns regarding possible violations of applicable laws or our ethical standards, as well as risks for human and environmental rights seriously. Our Whistleblowing Policy and grievance process, implemented in 2023, are compliant with the HinSchG (Gesetz für einen besseren Schutz hinweisgebender Personen); Directive (EU) 2019/1937 (EU Whistleblowing Directive) transposed into German national law.

Specifically, the policy details our commitment to providing protection to whistleblowers and affected individuals. We do not tolerate any discrimination against individuals who provide information in good faith, regardless of whether the suspicion is confirmed or not. Our SpeakUp! platform offers the possibility to create a secure mailbox, allowing individuals to remain anonymous. The platform also has a voice alteration service to prevent the identification of whistleblowers that choose to report incidents in an audio format.

We provide information and training to our employees on the HelloFresh Group's Whistleblowing Policy and protections through our intranet, posters, policies, and QR codes. Information is additionally integrated into annual training (hosted on our LMS) provided to employees. The policy and available internal reporting channels are integrated into our annual mandatory ethics and compliance training.

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[35] (EU) 2019/1937: Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law

Business Conduct Training within the HelloFresh Group

As part of our [Code of Ethics](#), all employees are required to comply with applicable laws and our internal standards on topics such as anti-corruption, conflicts of interest, non-discrimination and harassment, data protection, fair competition, respect for human rights, financial crimes, and insider trading. All employees are also required to undertake mandatory basic compliance training via e-learning modules upon joining the company, and every two years thereafter. The basic compliance training is complemented by annual deep-dive trainings on individual topics covered in our Code of Ethics based on identified focus areas. In 2024, the deep-dive training focused on educating [employees](#) and [people managers](#) on the prevention of harassment and discrimination in the workplace as an identified focus area.

In addition to our [Code of Ethics](#), we have implemented further Group-wide compliance policies specifying our standards and expectations regarding ethical trading, anti-corruption and bribery, competition laws, capital market compliance, and information security. Upon joining the company, all employees are required to read and acknowledge their review of our compliance policies and complete the basic compliance training.

Our ethics and compliance policies apply to all employees and functions. Employees that hold direct relationships with tenders, suppliers, or other business partners, like our Procurement function, are typically most at-risk of corruption and bribery.

Prevention and Detection of Corruption or Bribery

Prevention of Corruption and Bribery

The HelloFresh Group is committed to operating in an ethical and transparent manner, in strict compliance with all applicable anti-corruption and anti-bribery laws and regulations. A foundational requirement to conducting business with integrity is for all decisions taken by our employees to be free from improper influence, and for employees themselves to refrain from exerting improper influence.

Our approach to preventing incidents of corruption and bribery from occurring is through clear standards regarding gifts and invitations, and through training and regular communication with our employees on our policies and processes. Upon joining the HelloFresh Group, employees are required to read and formally acknowledge our Anti-Corruption Policy, which is applicable to all employees and interactions between our employees and authorities, business partners, suppliers, agents and any service providers. The policy sets out our standards with regards to corruption and bribery, in an effort to prevent any corrupt practices from occurring. Our Management Board is accountable for policy implementation and adherence.

The Anti-Corruption Policy is complemented by our mandatory compliance training, which includes a dedicated module on our ethical standards for anti-bribery and anti-corruption. Together, the policy and annual training equip employees with the knowledge to identify bribes in different business contexts, and to report incidents and take action in line with our processes. Employees can access the Anti-Corruption Policy on our dedicated Ethics & Compliance Portal on our Group-wide company intranet at all times.

Detecting and Addressing Corruption and Bribery

Suspicions of corruption or bribery are detected by employees, following the guidance provided in the trainings and policy described above. Employees can report any concerns through our [grievance mechanism](#).

Our Global Compliance function conducts an initial review of all reports received on corruption and bribery through our grievance mechanism, and assigns the concern to local compliance teams or dedicated functions, such as the US Asset Protection team, for further review and investigation. Where an individual in a management position is involved, the investigation is led and monitored by our Global Internal Audit function.

Governance of Corruption and Bribery Incidents

As part of the HelloFresh Group's regular compliance reporting, our Management Board is informed of any ongoing corruption and bribery cases, as well as their outcomes. Through the Audit Committee, the Supervisory Board is informed on an at least half-yearly basis of corruption and bribery cases at the HelloFresh Group.

Members of the Management and Supervisory Board are required to complete our basic compliance training, which, as described above, includes modules on anti-corruption and anti-bribery. The training must be completed every two years by all members of the Management and Supervisory Board.

Functions at Risk of Corruption and Bribery

Our Procurement teams are considered to be a function at risk of corruption and bribery due to the nature of their work which includes negotiating contracts, evaluating tenders, and conducting supplier visits. Like other HelloFresh Group employees, our Procurement teams are required to complete the basic compliance training, as well as formally acknowledge our Anti-Corruption Policy upon joining the company. In both our compliance training and the Anti-Corruption Policy, specific examples on detecting and managing cases of potential corruption and bribery within a procurement context are included.

As key decision makers for the Group, our Senior Management have significant influence and thus may be more frequently exposed to corruption and bribery risks than other employees, and may be able to override controls. We therefore consider Management to be a risk group for corruption and bribery.

Below, we present the proportion of our Senior Management and Procurement employees in our workforce (aggregated as "functions-at-risk") that are covered[36] by our basic compliance training, which includes a module on anti-corruption and anti-bribery.

	2024
Employees in functions-at-risk that are covered by compliance training programs	100%

Metrics Related to Corruption and Bribery

Confirmed Incidents of Corruption or Bribery

In 2024, there were 0 convictions, and €0 of fines paid related to confirmed violations of anti-corruption and anti-bribery laws. Any fines or convictions that would have been triggered as a result of a violation of anti-corruption and anti-bribery laws were in scope. The data is collected by our Local Compliance Officers, and aggregated by our Group Compliance function.

Actions to Address Breaches in Procedures and Standards of Anti-Corruption and Anti-Bribery

Since the HelloFresh Group did not experience any breaches of anti-corruption and anti-bribery laws in 2024, we did not need to take any actions to address breaches.

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[36] Covered: enrolled in training.

Appendices

Appendix 1 - Emission Factors

Metric	Data Point	Emission Factor
Scope 1 emissions	Gross Scope 1 GHG emissions	IEA, DEFRA
Scope 2 emissions	Gross Scope 2 GHG emissions	IEA, DEFRA
Scope 3 emissions	Purchased Goods & Services - Ingredients	Latis-HowGood
Scope 3 emissions	Purchased Goods & Services - Packaging	IDEMAT
Scope 3 emissions	Purchased Goods & Services - 3rd Party Operated Sites	IEA, DEFRA
Scope 3 emissions	Purchased Goods & Services - Other purchased goods & services	EXIOBASE
Scope 3 emissions	Fuel- and Energy-related Activities	IEA, DEFRA
Scope 3 emissions	Upstream Transportation and Distribution - Inbound	GLEC
Scope 3 emissions	Upstream Transportation and Distribution - Outbound	GLEC
Scope 3 emissions	Waste generated in operations	EPA
Scope 3 emissions	End-of-life treatment of sold products	HelloFresh LCA Study

Glossary

ASC: Aquaculture Stewardship Council

BAP: Best Aquaculture Practices

Benelux: Belgium, the Netherlands, Luxembourg

BPO: Business process outsourcing

BRCGS: British Retail Consortium Global Standard

BSI: British Standards Institute

CapEx: Capital expenditures

CO$_2$e: Carbon dioxide equivalent

CSRD: Corporate Sustainability Reporting Directive

DACH: Germany, Austria, Switzerland

DE: Germany

DEFRA: Department for Environment, Food & Rural Affairs (UK)

DE&I: Diversity, equity, and inclusion

DMA: Double materiality assessment

DNSH: Do No Significant Harm

DPC: Dynamic Packaging Configurator

EFRAG: European Financial Reporting Advisory Group

ERGs: Employee Resource Groups

ERMS: Enterprise risk management system

ESG: Environmental, Social, and Governance

ESRS: European Sustainability Reporting Standards

EV: Electric vehicles

E-Van: Electric van

F-gas: Fluorinated gases

FLP: Future Leaders Program

FSC: Forest Stewardship Council

FSQA: Food Safety and Quality Assurance

GLOBALG.A.P.: Global Good Agricultural Practices

GDPR: EU General Data Protection Regulation

GFSI: Global Food Safety Initiative

GHGs: Greenhouse gases

GHG Protocol: Greenhouse Gas Protocol Corporate Accounting and Reporting Standard Revised

HACCP: Hazard Analysis and Critical Control Points

HGB: Handelsgesetzbuch

HR: Human Resources

IEA: International Energy Agency

IROs: Impacts, risks, and opportunities

JHSC: Joint Health & Safety Committee

KPIs: Key performance indicators

LCA: Life Cycle Assessment

LkSG: Lieferkettensorgfaltspflichtengesetz

LMS: Learning Management System

LTI: Lost-time incidents

LTIFR: Lost-time injury frequency rate

MS: Minimum safeguards

MSC: Marine Stewardship Council

MSCI: (previously) Morgan Stanley Capital International

MWh: MegaWatt hours

NA: North America

NFRD: Non-Financial Reporting Directive

NGOs: Non-governmental organizations / Nonprofit organizations

Nordics: Denmark, Norway, Sweden

OEF: Operational Excellence Framework

OpEx: Operational expenditures

OSHA: Occupational Safety and Health Administration

PEFC: Programme for the Endorsement of Forest Certification

PPC: Pollution; Pollution Prevention and Control

QR: Quick response

RECs: Renewable Energy Certificates

R&D: Research and Development

RMS: Risk Management System

RSPO: Roundtable on Sustainable Palm Oil

COSO: Committee of Sponsoring Organizations of the Treadway Commission

SASB: Sustainability Accounting Standards Board

SC: Substantial Contribution criteria

SDGs: Sustainable Development Goals

Sedex: Supplier Ethical Data Exchange

SMETA: Sedex Members Ethical Trade Audits

Solar PV: Solar photovoltaic

SQF: Safe Quality Food

UK: United Kingdom

US: United States

WHO: World Health Organization

ZTS: Zero Trust Solution

360 LMS: 360 Learning Management System

Independent assurance practitioner's report[37]

To HelloFresh SE, Berlin

Assurance Conclusion

We have conducted a limited assurance engagement on the combined separate non-financial report of HelloFresh SE, Berlin, (hereinafter the „Company") to comply with §§ [Articles] 289b to 289e HGB [Handelsgesetzbuch: German Commercial Code] and §§ 315b to 315c HGB including the disclosures contained in this combined separate non-financial report to fulfil the requirements of Article 8 of Regulation (EU) 2020/852 (hereinafter the „Combined Non-Financial Reporting") for the financial year from 1 January to 31 December 2024.

Not subject to our assurance engagement were the external sources of documentation or expert opinions mentioned in the Combined Non-Financial Reporting, which are marked as unassured.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the accompanying Combined Non-Financial Reporting for the financial year from 1 January to 31 December 2024 is not prepared, in all material respects, in accordance with § 315c in conjunction with §§ 289c to 289e HGB and the requirements of Article 8 of Regulation (EU) 2020/852 as well as with the supplementary criteria presented by the executive directors of the Company.

We do not express an assurance conclusion on the external sources of documentation or expert opinions mentioned in the Combined Non-Financial Reporting, which are marked as unassured.

Basis for the Assurance Conclusion

We conducted our limited assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised): Assurance Engagements Other Than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board (IAASB).

The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under ISAE 3000 (Revised) are further described in the "German Public Auditor's Responsibilities for the Assurance Engagement on the Combined Non-Financial Reporting" section.

We are independent of the Company in accordance with the requirements of European law and German commercial and professional law, and we have fulfilled our other German professional responsibilities in accordance with these requirements. Our audit firm has complied with the quality management system requirements of the IDW Standard on Quality Management: Requirements for Quality Management in the Audit Firm (IDW QMS 1 (09.2022)) issued by the Institut der Wirtschaftsprüfer (Institute of Public Auditors in Germany; IDW). We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our assurance conclusion.

Responsibility of the Executive Directors and the Supervisory Board for the Combined Non-Financial Reporting

The executive directors are responsible for the preparation of the Combined Non-Financial Reporting in accordance with the relevant German legal and European regulations as well as with the supplementary criteria presented by the executive directors of the Company. They are also responsible for the design, implementation and maintenance of such internal controls that they have considered necessary to enable the preparation of a Combined Non-Financial Reporting in accordance with these regulations that is free from material misstatement, whether due to fraud (i.e., manipulation of the Combined Non-Financial Reporting) or error.

This responsibility of the executive directors includes selecting and applying appropriate reporting policies for preparing the Combined Non-Financial Reporting, as well as making assumptions and estimates and ascertaining forward-looking information for individual sustainability-related disclosures.

The supervisory board is responsible for overseeing the process for the preparation of the Combined Non-Financial Reporting.

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[37] Our engagement applied to the German version of the combined separate non-financial report 2024. This text is a translation of the independent assurance practitioner's report issued in German language, whereas the German text is authoritative.

Inherent Limitations in the Preparation of the Combined Non-Financial Reporting

The relevant German statutory legal and European regulations contain wording and terms that are still subject to considerable interpretation uncertainties and for which no authoritative, comprehensive interpretations have yet been published. As such wording and terms may be interpreted differently by regulators or courts, the legal conformity of measurements or evaluations of sustainability matters based on these interpretations is uncertain.

These inherent limitations also affect the assurance engagement on the Combined Non-Financial Reporting.

German Public Auditor's Responsibilities for the Assurance Engagement on the Combined Non-Financial Reporting

Our objective is to express a limited assurance conclusion, based on the assurance engagement we have conducted, on whether any matters have come to our attention that cause us to believe that the Combined Non-Financial Reporting has not been prepared, in all material respects, in accordance with the relevant German legal and European regulations as well as with the supplementary criteria presented by the executive directors of the Company, and to issue an assurance report that includes our assurance conclusion on the Combined Non-Financial Reporting.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), we exercise professional judgment and maintain professional skepticism. We also:

- obtain an understanding of the process to prepare the Combined Non-Financial Reporting.

- identify disclosures where a material misstatement due to fraud or error is likely to arise, design and perform procedures to address these disclosures and obtain limited assurance to support the assurance conclusion. The risk of not detecting a material misstatement resulting from fraud is higher than the risk of not detecting a material misstatement resulting from error, as fraud may involve collusion, forgery, intentional omissions, misleading representations, or the override of internal controls.

- consider the forward-looking information, including the appropriateness of the underlying assumptions. There is a substantial unavoidable risk that future events will differ materially from the forward-looking information.

Summary of the Procedures Performed by the German Public Auditor

A limited assurance engagement involves the performance of procedures to obtain evidence about the sustainability information. The nature, timing and extent of the selected procedures are subject to our professional judgement.

In conducting our limited assurance engagement, we have, amongst other things:

- evaluated the suitability of the criteria as a whole presented by the executive directors in the Combined Non-Financial Reporting.

- inquired of the executive directors and relevant employees involved in the preparation of the Combined Non-Financial Reporting about the preparation process, and about the internal controls relating to this process.

- evaluated the reporting policies used by the executive directors to prepare the Combined Non-Financial Reporting.

- evaluated the reasonableness of the estimates and the related disclosures provided by the executive directors.

- performed analytical procedures and made inquiries in relation to selected information in the Combined Non-Financial Reporting.

- performed site visits.

- considered the presentation of the information in the Combined Non-Financial Reporting.

- considered the process for identifying taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Combined Non-Financial Reporting.

Restriction of Use

We draw attention to the fact that the assurance engagement was conducted for the Company's purposes and that the report is intended solely to inform the Company about the result of the assurance engagement. Accordingly, the report is not intended to be used by third parties for making (financial) decisions based on it. Our responsibility is solely towards the Company. We do not accept any responsibility, duty of care or liability towards third parties.

Berlin, 12 March 2025
PricewaterhouseCoopers GmbH Wirtschaftsprüfungsgesellschaft
[Original German version signed by:]

sgd. Susanne Riedel   sgd. ppa. Dr. Kay Lubitzsch
Wirtschaftsprüferin   Wirtschaftsprüfer
[German public auditor]   [German public auditor]

HELLOFRESH

GROUP