



A Trading Division of
Staple Dairy Products Ltd

New Grove House, Murray Road, Orpington, Kent, BR5 3QY

ETHICAL TRADING CODE OF CONDUCT AND HUMAN RIGHTS POLICY

Staple Food Group (SFG) is a trading division of Staple Dairy Products Ltd, a UK-based business operating with a company registration number of 01881120.

SFG is committed to ensuring high standards among its suppliers and engaging with the supply base to bring about improvement. SFG will only work with reputable suppliers and manufacturers who are committed to working towards compliance with the conditions set out in this code. A process of self-evaluation, independent audit, and training is in place to ensure continuous improvement.

SFG also commits to compliance with the UK Modern Slavery Act 2015. This commitment is embedded within SFG's ethical trading and human rights policy.

1. Employment is freely chosen

- There is no forced, bonded, or involuntary prison labour.
- Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.
- A confidential whistleblowing mechanism is available to all workers to report concerns about forced labour or exploitation without fear of retaliation.

2. Freedom of association and the right to collective bargaining are respected

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.



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- Accommodation, where provided, shall be clean, safe, and meet the basic needs of workers.
- A member of senior management shall be assigned responsibility for health and safety.
- Compliance will be monitored against the UK Health and Safety at Work Act 1974 and relevant regulations.

4. **Child labour shall not be used**

- There shall be no recruitment of child labour.
- Where child labour is found, the employer shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child; “child” and “child labour” being defined below, at the end of this policy.
- Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- The policies and procedures relating to the employment of children shall conform to the provisions of the relevant ILO standards.
- Compliance will also be aligned with UK safeguarding legislation to ensure child protection.

5. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure shall not be permitted, nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.
- Compliance will be monitored against the UK National Minimum Wage Act 1998 and subsequent amendments.

6. **Working hours are not excessive**

- Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7-day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis, and shall always be compensated at a premium rate.



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7. **No discrimination is practised**

- There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Compliance will be monitored against the UK Equality Act 2010.

8. **Regular employment is provided**

- To every extent possible, work performed must be on the basis of recognised employment relationship established through national law and practice.
- Obligations to employees under labour social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. **No harsh or inhumane treatment is allowed**

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- A grievance mechanism will be made available to all workers to raise concerns confidentially.

10. **Environmental impact is managed**

- Suppliers should measure and, where appropriate, set measurable targets for reducing the environmental impacts of their business activities. In addition to complying with local laws, steps should be taken to optimise the use of energy and natural resources and reduce the generation of waste.

This policy will be reviewed on an annual basis by the SFG Senior Leadership Team with any new advice or directives from recognised certified agencies/legal bodies with standing ref. Ethical Trading compliance being adopted. Senior management will take direct accountability for ensuring compliance and will report progress annually.

Definitions

Child – Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply.

Young Person – Any worker over the age of a child as defined above and under the age of 18.

Child Labour: Any work by a child or young person younger than the age(s) specified in the above definitions which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young persons' health or physical, mental, spiritual, moral or social development.



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The provisions of this code constitute minimum, not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

Chris McNally

Chris McNally – Managing Director

W. Witkowska-Gosz

Wioleta Witkowska-Gosz – Head of Technical & Brand