

SASB INDEX

RESPONSIBLE BUSINESS
REPORT *2023*

SAMWORTH
BROTHERS

TOPIC	CODE	DISCLOSURE	RESPONSE
Energy management	FB-PF-130a.1	<ol style="list-style-type: none"> The entity shall disclose the total amount of energy it consumed as an aggregate figure, in gigajoules (GJ). The entity shall disclose the percentage of energy it consumed that was supplied from grid electricity. The entity shall disclose the percentage of energy it consumed that is renewable energy. 	<ol style="list-style-type: none"> 1,473,390 GJ. 23.18%. 23.22%.
Water management	FB-PF-140a.1	<ol style="list-style-type: none"> The entity shall disclose the amount of water, in thousands of cubic metres, that was withdrawn from all sources. The entity may disclose portions of its supply by source if, for example, significant portions of withdrawals are from non-freshwater sources. The entity shall disclose the amount of water, in thousands of cubic metres, that was consumed in its operations. The entity shall disclose its water withdrawn in locations with High or Extremely High Baseline Water Stress as a percentage of the total water withdrawn. The entity shall disclose its water consumed in locations with High or Extremely High Baseline Water Stress as a percentage of the total water consumed. 	<ol style="list-style-type: none"> 1,265,637 m3. *Note this figure includes metered water usage for primary production sites only (not including non-operational sites such as offices). N/A. We don't measure water discharge, so we're unable to report water consumption. 0% (100% of water is withdrawn from within the UK, classified as low-medium in the WRI national water stress rankings). 0% (100% of water is withdrawn from within the UK, classified as low-medium in the WRI national water stress rankings).
	FB-PF-140a.2	<ol style="list-style-type: none"> The entity shall disclose the total number of instances of non-compliance, including violations of a technology-based standard and exceedances of quantity and/or quality-based standards. 	<ol style="list-style-type: none"> There were 38 instances of trade effluent consent non-compliance (out of 974 samples) during the year, that resulted in the issue of a compliance letter from a water company. We work closely with our water retailer and wholesalers on monitoring effluent quality and implementation of corrective action, in the event of issues being identified. There were no formal enforcement actions taken.
	FB-PF-140a.3	<ol style="list-style-type: none"> The entity shall describe its water management risks associated with water withdrawals, water consumption, and discharge of water and/or wastewater. The entity shall discuss its short-term and long-term strategies or plan to mitigate water management risks. For water management targets, the entity shall additionally disclose: <ol style="list-style-type: none"> Whether the target is absolute or intensity-based, and the metric denominator if it is an intensity-based target. The timelines for the water management plans, including the start year, the target year, and the base year. The mechanism(s) for achieving the target. The percentage reduction or improvement from the base year. The entity shall discuss whether its water management practices result in any additional lifecycle impacts or tradeoffs in its organisation, including tradeoffs in land use, energy production, and greenhouse gas (GHG) emissions, and why the entity chose these practices despite lifecycle tradeoffs. 	<ol style="list-style-type: none"> Water management risks are present in our operations; both from the potential limitation of water use volume restrictions as well as trade effluent volume restrictions placed upon us via local water undertakers. Specific risks are localised to individual bakeries, dependent upon local infrastructure. Risks are monitored and discussions held with water undertakers on a regular basis to review performance versus trade effluent consents. We regularly assess the water-related risks at our facilities and track bakery water use through our monitoring and targeting software, and automated water meters. This allows us to track water usage on a half hourly basis, to determine high usage sites and track unusual consumption patterns. We work closely with our water retailer and wholesalers, on our water supply and how to conserve it and our effluent, including monitoring of its quality and implementation of corrective action, in the event of issues being identified. We've considered water management risks as part of our climate risk assessment in line with the recommendations of the Task Force on Climate-related Financial Disclosures. Water availability is integral to two identified risks: <ul style="list-style-type: none"> Risk: climate-related impacts on the cost and availability of raw materials. Strategic response: we've long-standing relationships with key suppliers and regularly monitor material availability and supply plans to ensure continuity and have dual sourcing arrangements in place to mitigate key material disruption risks. Risk: climate change impacts on our operations. Strategic response: management teams at each bakery are responsible for site risk management and mitigation. Each facility maintains an up-to-date and regularly tested operational business continuity plan and site-specific mitigation is in place and monitored. Proposed acquisitions are assessed under multiple scenarios and due diligence is undertaken to identify any risks and appropriate mitigation measures required. We don't have a Group-wide water reduction target, however usage is monitored at bakery level. We haven't identified any trade-offs related to our water management practices.

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Food safety	FB-PF-250a.1	<ol style="list-style-type: none"> The entity shall disclose its facilities' non-conformance rates with Global Food Safety Initiative (GFSI) recognised food safety certification programmes for (a) major non-conformances, and separately, (b) minor non-conformances. The entity shall disclose the corrective action rates associated with its facilities' (a) major non-conformances, and separately, (b) minor non-conformances. The entity may disclose the GFSI-recognised certification programme by which its facilities are audited. 	<ol style="list-style-type: none"> Major non-conformance rate = 0.0. Minor non-conformance rate = 3.9. Not applicable: there were no major non-conformances. 100% completion of corrective actions for minor non-conformances. BRCGS Global Standard for Food Safety Issue 9.
	FB-PF-250a.2	<ol style="list-style-type: none"> The entity shall disclose the percentage of food ingredients sourced from Tier 1 supplier facilities that are certified to a Global Food Safety Initiative (GFSI) recognised food safety certification programme. The entity may disclose the relevant GFSI-recognised certification programme to which its suppliers are audited. 	<ol style="list-style-type: none"> 97.3% of our food ingredients are sourced from facilities that are certified to a GFSI-recognised food safety certification programme. The GFSI certification programmes that we use include, or are provided by: British Retail Consortium (BRC), BRC agents and brokers, BRC storage and distribution, FSSC 22000, GLOBALG.A.P, IFS Food Standard, PrimusGFS, SQF.
	FB-PF-250a.3	<ol style="list-style-type: none"> The entity shall disclose the total number of notices of violation received that substantiate a violation of advisory and administrative code(s), statute(s), or other requirement(s) related to food safety. The entity shall disclose the percentage of notices of violations received related to food safety that was corrected. 	<ol style="list-style-type: none"> We've had no notices of violations. N/A.
	FB-PF-250a.4	<ol style="list-style-type: none"> The entity shall disclose the total number of food safety-related recalls issued. The entity shall disclose the total amount, in metric tonnes, of food product subject to recalls. The entity may disclose the percentage of recalls that were voluntarily issued and the percentage of recalls that were involuntarily issued. 	<ol style="list-style-type: none"> There was one recall during the year affecting four products. This was due to a supplier-related issue with small stones in the leaf used in these products. 9.46 tonnes. 100% voluntarily issued.
Health & nutrition	FB-PF-260a.1	<ol style="list-style-type: none"> The entity shall disclose the total revenue from the sales of its products that are labelled and/or marketed to promote health and nutrition attributes. 	<ol style="list-style-type: none"> Samworth Brothers is primarily a private label manufacturer and as such we aren't able to collect data for these products. In terms of our owned branded businesses, we're developing systems to enable collection of this data. We've launched an extensive Modernisation Programme for which this data is in scope.
	FB-PF-260a.2	<ol style="list-style-type: none"> The entity shall discuss its process to identify and manage products and ingredients related to nutritional and health concerns among consumers. The entity shall discuss its efforts to identify concerns, the products and ingredients related to those concerns, and resulting risks and opportunities. The entity shall discuss how identified concerns and risks are managed and communicated. The entity shall discuss its use of certification programmes that address consumer concerns and preferences over ingredients, additives and potential allergens. The entity shall discuss any significant complaints, such as those resulting in significant lawsuits, relating to nutritional and health concerns associated with products and/or ingredients, and any efforts to mitigate the related future risks. 	<ol style="list-style-type: none"> We've in place a cross-functional and multi-disciplinary Portfolio Evolution Team, that meets regularly to continually develop, review and appraise our health and nutrition strategy. We've an established health and nutrition database in place. This enables collection of nutritional and recipe data used to calculate Nutrient Profiling Model (NPM) scores. This data informs our position and workstreams. We utilise consumer insight from our dedicated insight function as well as the expertise of our nutritionists to identify emerging science and trends. We've governance processes in place to highlight and manage concerns through our portfolio evolution and Responsible Business Forums. We offer a breadth of choice within our product range which includes vegan, vegetarian and gluten-free products, for example. These products are manufactured to high industry standards. Our relevant manufacturing sites maintain approval from BRCGS, the Roundtable on Sustainable Palm Oil (RSPO), the Marine Stewardship Council (MSC) and our retailer customers. We received no significant complaints relating to nutritional or health concerns in 2023.

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Product labelling & marketing	FB-PF-270a.1	<ol style="list-style-type: none"> The entity shall disclose the percentage of advertising impressions made on children. The entity shall disclose the percentage of advertising impressions made on children that promote products that meet the CFBAI Uniform Nutritional Criteria or equivalent dietary guidelines for children. 	<ol style="list-style-type: none"> The majority of product manufacture at Samworth Brothers is for retailer private label. Samworth Brothers is not responsible for any advertising relating to these products and as such we don't collect data concerning advertising of these products. Samworth Brothers' owned brands are subject to our Responsible Marketing Policy published on our company website. Our media targeting is regularly monitored by our media agency and the third-party media owners. We don't market any of our products to children under the age of 16 unless both the advertised product, and >90% of the advertised brand range are classified as 'non-HFSS' under the UK's Nutrient Profiling Model (NPM) system.
	FB-PF-270a.2	<ol style="list-style-type: none"> The entity shall disclose its revenue from products sold during the reporting period that are labelled as containing genetically modified organisms (GMOs), and separately, not containing GMOs (non-GMOs). 	<ol style="list-style-type: none"> Samworth Brothers doesn't manufacture any products containing GMOs.
	FB-PF-270a.3	<ol style="list-style-type: none"> The entity shall disclose the total number of substantiated incidents of non-compliance with labelling- and/or marketing-related regulatory code(s), statute(s), or other requirement(s). 	<ol style="list-style-type: none"> Zero incidents of non-compliance with labelling- and/or marketing-related regulatory code(s), statute(s), or other requirement(s).
	FB-PF-270a.4	<ol style="list-style-type: none"> The entity shall disclose the total amount of monetary losses it incurred during the reporting period as a result of legal proceedings associated with marketing and/or labelling practices, such as those related to enforcement of U.S. laws and regulations on nutrient content claims, health claims, other unfair or deceptive claims, and/or misbranded labelling. 	<ol style="list-style-type: none"> There were no legal proceedings associated with marketing and/or labelling practices.
Packaging lifecycle management	FB-PF-410a.1	<ol style="list-style-type: none"> The entity shall disclose the total weight of packaging purchased by the entity, in metric tonnes. The entity shall disclose the percentage of packaging, by weight, made from recycled and/or renewable materials. The entity shall disclose the percentage of packaging, by weight, that is recyclable, reusable, and/or compostable. The entity may break down the disclosure requested above by major packaging substrate (e.g., wood fibre, glass, metal, and petroleum-based). 	<ol style="list-style-type: none"> 34,092 tonnes. We don't currently have the systems in place to be able to calculate recycled content across our portfolio. We don't currently have the systems in place to be able to report recyclability across our product portfolio. In terms of recyclability of overall materials used (not considering packaging formats), during 2023 we used: <ul style="list-style-type: none"> Recyclable materials: N/A. Paper/card: 25,326 tonnes. Glass: 95 tonnes. Aluminium: 299 tonnes. Plastic: 8,372 tonnes.
	FB-PF-410a.2	<ol style="list-style-type: none"> The entity shall discuss its strategies to reduce the environmental impact of packaging throughout its lifecycle, such as optimising packaging weight and volume for a given application or using alternative materials, including those that are recycled, recyclable, reusable, and/or compostable. The entity shall discuss the circumstances surrounding its use of recycled and renewable packaging, including, but not limited to, discussions of supply availability, consumer preferences and packaging durability requirements. The entity shall discuss the circumstances surrounding its use of packaging that is recyclable and compostable, including, but not limited to, discussions of regulations, packaging end-of-life commitments, consumer demand and packaging durability. 	<ol style="list-style-type: none"> We're committed to developing solutions that reduce the amount of packaging used and its potential impact on the environment, without compromising on food protection. To improve plastics recyclability, we're looking to move to mono materials wherever possible. We aim to minimise plastic usage by utilising alternatives where we can, such as replacing plastic internal trays with card. To maximise what gets recycled in practice, we use the On-Pack Recycling Label (OPRL) to guide consumers about recyclability across our branded portfolio. We're also aiming to increase the amount of recycled content used in our packaging and this year have analysed our entire portfolio to evaluate recycled content potential. We maximise our use of recycled materials across our portfolio wherever possible and we're constantly reviewing new opportunities available to us in the market. This includes using recycled content from plastics trays, to make new plastic trays. Our journey to reduce our use of virgin material also includes exploration of renewable material sources such as bio-based plastics however these are generally in early developmental stages with limited scalability. Our ambition is to use 100% recyclable packaging however some challenges remain around functionality, such as where the material is to be heated or where food waste may be impacted. These items continue to be reviewed and developed into recyclable options when available.

TOPIC	CODE	DISCLOSURE	RESPONSE
Environmental & social impacts of ingredient supply chain	FB-PF-430a.1	<ol style="list-style-type: none"> The entity shall disclose the percentage of food ingredients sourced that are certified to a third-party environmental and/or social standard. The entity shall disclose the percentage of food ingredients it sourced that are certified to a third-party environmental or social standard, by standard. 	<ol style="list-style-type: none"> 4.4%. Note – this percentage has been calculated based on the number of purchased product specifications that have certification. 4.4% of purchased products have Roundtable on Sustainable Palm Oil (RSPO) certification, of which: <ul style="list-style-type: none"> 3.4% is from Segregated (SG). 0.8% is from Mass Balance (MB). 0.2% is from combined MB/SG/Identity Preserved (IP) supply chain models.
	FB-PF-430a.2	<ol style="list-style-type: none"> The entity shall disclose its supplier facilities' non-conformance rate with external social and environmental audit standard(s) or internally developed supplier code(s) of conduct for (a) major non-conformances, and separately, (b) minor non-conformances. The entity shall disclose the corrective action rates associated with its supplier facilities' (a) major nonconformances, and separately, (b) minor non-conformances. The entity shall disclose the standards and/or code(s) of conduct to which it has measured social and environmental responsibility audit compliance. 	<ol style="list-style-type: none"> We review Sedex data and monitor our suppliers to identify any significant issues, however we don't currently track the minor non-conformance rate. We don't currently track the non-conformance corrective action rates. The audit standard is Sedex Members Ethical Trade Audit (SMETA), which measures compliance to the Ethical Trade Initiative (ETI) base code and local legislation.
Ingredient sourcing	FB-PF-440a.1	<ol style="list-style-type: none"> The entity shall disclose the percentage of food ingredients sourced from regions with High or Extremely High Baseline Water Stress. 	<ol style="list-style-type: none"> 12.08%. Note – this percentage has been calculated based on the number of purchased product specifications.
	FB-PF-440a.2	<ol style="list-style-type: none"> The entity shall identify the highest priority food ingredients to its business. The entity shall discuss its strategic approach to managing the environmental and social risks that arise from its highest priority food ingredients. 	<ol style="list-style-type: none"> Our highest priority ingredients include pork, poultry, red meat, bakery, dairy, fish and seafood. We also consider palm oil and soy to be high priority due to the risk of deforestation in supply chains. We use palm oil as a direct ingredient in our products and we use soy as an indirect ingredient within animal feed in the protein we source. We use a risk assessment model to analyse the environmental and social risks of the food that we buy from our suppliers. This includes a range of indicators by country and raw material category, to identify areas of greatest risk. We monitor key areas, such as human rights risks, measurement of our soy footprint, palm oil footprint, and carbon impact through our Scope 3 analysis and reporting. We then focus our Responsible Sourcing Programme on those suppliers with the biggest impact. Our Responsible Sourcing Policy defines our targets for soy and palm oil: <ul style="list-style-type: none"> Zero deforestation and conversion-free soy by end of 2025. 100% segregated palm oil by end of 2025. In support of this target, we're also signatories to the UK Soy Manifesto.
Activity metrics	FB-PF-000.a	Weight of products sold (in metric tonnes).	252,310 tonnes.
	FB-PF-000.b	Number of production facilities.	As of December 2023: Twelve primary production sites (those which manufacture product with sales of >500 tonnes/year).