

# Samworth Brothers Responsible Sourcing Charter



Version 1, December 2022

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## INTRODUCTION

We do good things with great food - Samworth Brothers' purpose and values put both people and the environment at the centre of what we do. In 2021 we launched our new Responsible Business Strategy – our Positive Impact Plan. Our ambition is to be a force for good - making a positive difference for our people, our communities and in our supply chain. One key pillar in our strategy is 'Sourcing with Care'. We cannot implement this workstream without partnership, collaboration, and support from our suppliers.

This supplier charter covers a variety of sourcing areas that we are focussing on to drive positive change. It outlines our minimum requirements and policies, but also explains our new approach to work more collaboratively so that collectively we can make a larger positive impact. We also risk assess our suppliers and ask they link to us on Sedex, in 2022 we had risk assessed 98% of suppliers by spend.

Section 1: Treating people fairly - Human Rights

Section 2: Sourcing with Care for the Planet

- a. Palm Oil
- b. Soy
- c. Packaging
- d. Marine sustainability

Section 3: Animal Welfare

## SCOPE

All supply chains must comply with requirements listed in sections 1 and 2. Section 3 is relevant to supplier of meat and fish proteins, dairy, and egg production.

## ROLES AND RESPONSIBILITIES

The Responsible Business Team are responsible for this document, any future developments and monitoring implementation.

It is the responsibility of Samworth NPD and Innovation teams to be familiar with this sourcing charter and communicate it when onboarding new suppliers and ensure suppliers are compliant with it.

It is the responsibility of group and site procurement and technical teams to ensure existing suppliers are working to these standards.

It is the responsibility of the supplier to ensure the standards are communicated and adhered to at all stages of the supply chain.

## SECTION 1: TREATING PEOPLE FAIRLY – HUMAN RIGHTS REQUIREMENTS

### 1.1 Samworth Brothers Human Rights Requirements

**Action required:** All suppliers are to be compliant with this Human Rights Requirements – includes minimum requirements and SEDEX – see [appendix 1](#) for ETI base code and [appendix 2](#) for requirements

## I.2 Samworth Brothers Responsible Sourcing Programme

**Action required if contacted:** Select suppliers will be informed that they are in scope for an additional Samworth Brothers Responsible Sourcing Programme – this involves an annual meeting to discuss your approach to sustainability including both environmental work and Human Rights due diligence. The aim is that this is collaborative, and we work together to better understand risk and mitigate it in our supply chains. Further details will be provided to relevant suppliers.

### SECTION 2: SOURCING WITH CARE FOR THE PLANET

Securing a sustainable supply of raw materials is fundamental to the future growth of our business and achieving our ambition to deliver our Positive Impact Plan.

Our plan is based on the following broad areas:

- Sustainable sourcing to the highest standards from our network of current and new suppliers
- Delivering a step change to sustainable sourcing through the continuous improvement of our policies with our customers and suppliers
- Understanding and reacting to the impact that land conversion and deforestation are having on the natural environment and our ability to have a sustainable future.
- Ensuring recognised certification to sustainable sources is adopted across our raw material portfolio

We have three current measurable objectives:

- Zero deforestation and conversion free supply chains by 2025
- Carbon Net Zero for Scope 3 emissions by 2040

**Action required if contacted:** To move us forward in this area select suppliers will be contacted to take part in our Responsible Sourcing Programme – as mentioned [above](#).

Additionally, we have specific requirements for specific areas and commodities: Palm oil, soy, packaging, marine sustainability – as detailed below.

#### 2.1 Palm Oil

We purchase palm oil and palm oil derivatives for several of our products, sourced from reputable producers who have direct contact, and in some cases ownership, of the palm plantations and palm mills. Our usage is not significant in relation to global production; however, it is an important raw material particularly in our savoury pastry category.

We need to ensure that no palm oil or derivatives we purchase contribute to any negative impact on environmental or ethical grounds. We are members of the Roundtable for Sustainable Palm Oil (RSPO) and fully support the principles and criteria of the scheme. Over the years we have worked to increase the percentage of segregated palm oil.

**Action required:** if sourcing palm oil directly or as a subcomponent of an ingredient it must be RSPO certified segregated. Any questions or concerns with this please engage directly with the Samworth Group Responsible Business Manager.

#### 2.2 Soy Sourcing

Soy exists as both direct soy and embedded soy in animal feed in the products we make. Our soy footprint is primarily formed from embedded soy in ingredients such as in meat, eggs, farmed fish and dairy products.

Samworth Brothers have committed to zero deforestation and conversion of peatlands in our supply chain by 2025. We have further strengthened this commitment as we are signatories of the UK Soy Manifesto and are members of the Soy Transparency Coalition.

**Action required:**

- 1) We will ask relevant suppliers to complete questionnaires to help us better understand our soy supply chain.
- 2) We ask suppliers to match our commitment of zero deforestation by 2025 and work to create an action plan and comply with the UK Soy Manifesto.

## 2.3 Packaging

Packaging should be fit for purpose, designed to protect the safety of the consumer, and maintain the integrity of the product.

Packaging should be designed with circularity in mind and be fully recyclable in the UK. It should be optimised to minimise the overall weight of packaging and to reduce its carbon footprint.

Whilst working within our customer (UK retailer) frameworks, we are committed to the following requirements for our packaging.

### **Plastic Packaging**

- All plastic packaging must be made from a single material type (mono material).
- All plastic packaging must contain a minimum of 30% post consumer waste (excluding regrind) where available and viable.
- Contamination levels for recyclability should adhere to CEFLEX guidelines for Flexibles.
- Compostable plastics are not currently considered viable.

### **Paper Packaging**

- 100% of paper raw material to be sourced from sustainable and ethical forest with PEFC or FSC sources preferred.
- Contamination levels for recyclability should conform to OPRL guidelines.

## 2.4 Marine Sustainability

- Wild caught seafood - MSC or equivalent where available – please liaise with site teams and refer to retailer requirements.
- Farmed seafood – please liaise with site teams and refer to retailer requirements.

Any questions or concerns with this please engage directly with the Samworth Group Responsible Business Manager.

## SECTION 3: ANIMAL WELFARE

We support the aspirations of our retailer customers by ensuring compliance to their welfare policies. All raw materials supplied to us must support the five freedoms.

### Five Freedoms

The fundamentals of our Animal Welfare objectives are based on the 'Five Freedoms' outlined by FAWC.

- **Freedom from Hunger and Thirst** - by ready access to fresh water and a diet to maintain full health and vigour.
- **Freedom from Discomfort** - by providing an appropriate environment including shelter and a comfortable resting area.
- **Freedom from Pain, Injury or Disease** - by prevention or rapid diagnosis and treatment.
- **Freedom to Express Normal Behaviour** - by providing sufficient space, proper facilities and company of the animal's own kind.
- **Freedom from Fear and Distress** - by ensuring conditions and treatment which avoid mental suffering.

### Cage Free Eggs

We have committed to moving to 100% cage-free eggs by the end of 2025 for our own Brands. This is outlined in a separate statement on our website.

## APPENDIX 1 – ETHICAL TRADING INITIATIVE BASE CODE

### 1. Employment is freely chosen

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.

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

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 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

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of 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.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

### 4. Child labour shall not be used

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; “child” and “child labour” being defined in the appendices.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards

## 5. Living wages are paid

5.1 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.

5.2 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.

5.3 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.

## 6. Working hours are not excessive

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.\*

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

## 7. No discrimination is practiced

7.1 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.



## 8. Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or 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 homeworking 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

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited

## APPENDIX 2 – SAMWORTH BROTHERS HUMAN RIGHTS REQUIREMENTS

These requirements have been developed with collaboration in mind through openness and transparency. We request that the Samworth Brothers Responsible Business Manager is contacted if any human rights concerns are brought to your attention.

Adherence to these requirements is a condition of supply to Samworth Brothers.

### Human Rights Approach

Samworth Brothers' values put people at the core of what we do, and the organisation is committed to working in line with the United Nations (UN) Guiding Principles on Business and Human Rights.

We follow the standards that are contained in the Ethical Trading Initiative ([ETI](#)) [base code](#), and local and national laws. It is expected that our suppliers to do the same.

We expect our suppliers to have policies and processes in place to proactively manage human rights risks throughout their supply chains.

### Scope of requirements

Suppliers that fall into the scope of these compliance requirements are as follows:

- All tier 1 food manufacturing sites.
- All tier 1 packaging suppliers.
- All agents (food and packaging).
- All second-tier suppliers via agents (food and packaging).
- Service suppliers.

In addition, suppliers that fall outside of this scope may be asked to provide evidence of Labour Standards compliance and actions undertaken in support of Human Rights.

### Registering sites on the Supplier Ethical Data Exchange (SEDEX)

All suppliers outlined above (in scope of requirements) are required to be Sedex registered, including each appropriate subsidiary site or supplier sites that supply products or services to Samworth Brothers. Requirements include:

- Ensuring the appropriate membership level for your organisation.
- Registering each manufacturing site that directly supplies any Samworth Brothers business on SEDEX.
- Agents must also register on SEDEX.
- From time-to-time Samworth Brothers may request that additional high ethical risk sites are registered on SEDEX. Suppliers must be proactively liaising with companies in their supply chain to assist with this process. When these requests are made, Samworth Brothers will be transparent about why this additional information is needed.

### Link to Samworth Brothers

- All supplying sites that are required to register on SEDEX must also link to Samworth Brothers on SEDEX.
- Sites must ensure that all data held in SEDEX is visible i.e., double check visibility settings and that any ethical audits undertaken are published.

## SEDEX Self-Assessment Questionnaire (SAQ)

- All supplying sites that are required to register on SEDEX must complete the SAQ to 100%.
- The SAQ should be reviewed and updated at least annually. Care should be taken when completing the SAQ. Supplying sites should use the questionnaire to conduct a gap analysis and identify areas for improvement.

## Risk Assessment Process

We undertake a risk assessment of our supply chain to determine where we need to focus our due diligence.

In our first-tier supply chains our risk assessment comprises 3 elements.

- As members of the Food Network for Ethical Trade (FNET) we apply the FNET risk assessment methodology to our supply chain, which identifies high risk countries and products. This methodology provides us with our prioritisation into high, medium, and low risk sites.
- We focus on supply chains with inherent and/or historical risk. These include seafood, poultry, and fresh produce for example.
- We use the Supplier Ethical Data Exchange (SEDEX) data tool to identify areas of additional risk.

## Ethical Audit Due Diligence

Suppliers who have undertaken an ethical audit either themselves, or under instruction from another customer, are required to share the audit with us by allowing us visibility on SEDEX. We do not require our suppliers to undertake an ethical audit on our behalf.

Whilst we do not require an ethical audit, Samworth Brothers reserve the right to request or undertake an announced, semi-announced or unannounced ethical audit, of any site supplying Samworth Brothers, at any time, regardless of country risk rating or supplier status.

## Audit Reports and Corrective Actions

As a responsible business Samworth Brothers has duty to apply a continuous improvement model across our supply chain, therefore for those sites that have had an ethical audit, either for themselves or for other customers the following applies:

- At the end of the audit a 'Corrective Action Plan Report (CAPR)' will be initiated by the auditor and discussed with the site/supplier representatives. This is a high-level list of actions that need to be undertaken, the timescales for completion, and an indication of whether a follow-up visit is required to verify progress.
- The audit body will produce the audit report and send it to the supplier/site within a maximum of 28 days. It is the responsibility of the supplier to ensure that a copy of this audit is visible to Samworth Brothers. The audit body must upload the audit to SEDEX, which is paid for by the supplier/site.
- Where any critical or business critical non-conformance are raised, the supplier must alert Samworth Brothers within 48 hours, regardless of country risk rating.
- Critical or business critical non-conformances must be closed out within the time frame agreed with the auditor, including undertaking a follow-up audit if required. Any critical or business critical non-conformances identified during a pre-supply audit must be addressed before commencing supply and verified as soon as possible. It is the responsibility of the primary supplier to manage this process.