

Samworth Brothers Responsible Sourcing Policy

Our responsible sourcing principles for supply partners



Version 2
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1. INTRODUCTION

1.1 Why Responsible Sourcing is important for us

We do
GOOD things
with
GREAT food

Samworth Brothers' purpose puts both people and the environment at the centre of what we do. Our Responsible Business Plan is comprised of four pillars and the first pillar is 'Responsible Sourcing'. A major part of delivering our Plan is driven by action in our supply chains.

Our commitments:

- We have committed to reducing our whole value chain carbon footprint - also known as our absolute Scope 3 GHG emissions. As part of this work, we are working with our supply partners to help them set their own carbon reduction commitments.
- We are setting targets to sustainably source key raw materials. For example, we have committed to ensuring that our own-brand product supply chains will be deforestation and conversion free by 2025.
- We are committed to sourcing animal-derived ingredients from supply partners that demonstrate continuous improvement in animal health and welfare.
- We are committed to championing human rights and ensuring that people are treated fairly throughout our business and supply chains.

This Responsible Sourcing Policy ('the Policy') explains our approach to work more collaboratively with supply partners to achieve common objectives and defines our requirements.

Samworth Brothers fully supports delivery of the UN Sustainable Development Goals (SDGs) by 2030. Our business and brands positively impact several SDGs. Through our supply chain we believe we can have the greatest impact on nine of the goals:



I.2 Scope - who does the Policy apply to?

Our Policy defines our expectations for our direct (tier one) suppliers of ingredients, packaging and selected indirect categories. We expect supply partners to work with us to comply with both the letter and the spirit of this Policy – and to be able to clearly demonstrate that this is the case.

Our Tier One suppliers are expected to work with their supply chains to ensure that these requirements are also complied with throughout their supply chains. Our ambition for visibility will not stop with direct suppliers in all cases. We may require greater detail regarding further tiers within supply chains as our programme evolves.

Specific requirements for individual raw materials are defined within individual policies and referenced in this document. It is the responsibility of the supplier to ensure that they understand and implement policies that are relevant to their trading activity with Samworth Brothers.

2. RESPECT FOR HUMAN RIGHTS

Samworth Brothers have global supply chains. It is a requirement that all suppliers, regardless of geographical location, ensure that their business activities comply with relevant local laws and regulations and this Policy. It is the responsibility of suppliers to document and understand these local laws and regulations. We expect all suppliers to respond to requests regarding supply chain data in a full, prompt and supportive manner.

2.1 Upholding the Ethical Trade Initiative (ETI) Base Code

- Samworth Brothers are committed to working in line with the United Nations (UN) Guiding Principles on Business and Human Rights. Upholding the Ethical Trading Initiative (ETI) base code is one of the requirements of doing business with Samworth Brothers.
- Suppliers are required to show compliance with the ETI base code and labour laws, for example working towards the eradication of recruitment fees and that no discrimination is practiced. We expect our suppliers to have policies and processes in place to proactively manage human rights risks throughout their supply chains.

2.2 Responsible Recruitment

- Samworth Brothers supports the Employer Pays Principle; that no worker should pay for a job, and that the cost of recruitment should be borne not by the worker, but by the employer.
- The charging of recruitment fees to migrant workers can create debt bondage, where a person is trapped in work to pay off a debt. In 2022 it was reported that a fifth of people in forced labour exploitation were in a situation of debt bondage. Samworth Brothers is committed to working with suppliers to resolve issues where recruitment fees are identified.

2.3 Demonstrating Compliance via Supplier Ethical Data Exchange (SEDEX)

- We ask the following suppliers to register on SEDEX and link to Samworth Brothers (ZC1043909).
 - All direct suppliers: Food manufacturing sites, Packaging suppliers, and Agents (food and packaging)
 - All food manufacturing and packaging sites supplied via agents that are required to complete our technical self-assessment questionnaire in Foods Connected
 - Indirect suppliers – will be risk assessed and asked to join Sedex on a case-by-case basis
- From time-to-time Samworth Brothers may request that additional high ethical risk sites are registered on SEDEX. Suppliers must proactively liaise 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.
- Supplying sites in scope must complete the following:
 - Ensure the appropriate membership level for your organisation
 - Register each supplying site on SEDEX
 - Link to Samworth Brothers on SEDEX
 - Complete the Self-Assessment Questionnaire (SAQ) to 100% - this should be reviewed and updated at least annually
 - Grant visibility to any ethical audit on SEDEX and ensure all recent audits are published

2.4 SEDEX Members Ethical Trade Audit (SMETA)

- As a responsible business, Samworth Brothers has a duty to apply a continuous improvement model across our supply chain; therefore for those sites that have had an SEDEX Members Ethical Trade Audit (SMETA), 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. 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.
- We do not routinely require suppliers to undertake a SMETA (ethical audit) on our behalf. However, SMETA audits may be required of suppliers on a case by case, risk assessed, basis.

3. RESPECT FOR THE ENVIRONMENT

Securing a sustainable supply of raw materials is fundamental to the future growth of our business and achieving our commitments within our Responsible Business Plan. Within our plan we have identified specific work programmes.

3.1 Climate

- Samworth Brothers have committed to reducing our whole value chain carbon footprint - also known as our absolute Scope 3 GHG emissions. We have set targets to reduce all of our emissions, in line with the latest science designed to keep global warming below 1.5°C. These Science-Based Targets (SBTs) have been submitted to the Science-Based Targets Initiative (SBTi) for approval.
- We expect key supply partners to set carbon reduction targets for Scopes 1, 2 & 3 in line with climate science (Science-Based Targets (SBTs) approved by the Science-Based Targets Initiative (SBTi)).

3.2 Marine Ecosystems

- Marine ecosystems are critically important to our daily lives and the future of the planet. We have an ambition for 100% of our seafood to be sustainably sourced. Many of our source fisheries are already certified as independently certified to the Aquaculture Stewardship Council (ASC) standard, Marine Stewardship Council (MSC) standard, whilst others are working towards this goal, often through Fishery Improvement Projects (FIPs).
- We expect key supply partners to ensure fish sourcing standards meet specific customer or brand requirements.

3.3 Water Stress

- A critical component of water stewardship is collective action. The Courtauld 2030 Water Roadmap is a practical response for the protection of water resources, and brings together food and drink businesses to collectively take action in water catchments. The overarching goal of the Roadmap is for 50% of the UK's fresh food to be sourced from areas with sustainable water management by 2030.
- We expect key supply partners to identify water risk hotspots in the supply chain, understanding the sourcing risk from any high-risk locations, for example via the WWF Water Risk Filter (<https://waterriskfilter.org/>) or WRI Aqueduct Water Risk Atlas (<https://www.wri.org/aqueduct>).

3.4 Deforestation

The Supplier ensures that its operations do not directly contribute to deforestation or loss of biodiversity. We expect our suppliers to respect the principle of Free, Prior, Informed Consent (FPIC) and land rights of indigenous population and local communities within their supply chains when sourcing commodities.

3.4.1 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. Palm oil is a commonly used edible vegetable oil that is found in multiple ingredients from margarine to bread.
- 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.
- We have a commitment that all Palm oil is free from deforestation and conversion by 2025, with a cut-off date of December 2020.
- Supply partner requirements:
 - All palm oil used in Samworth Brothers products must be physically certified to Roundtable on Sustainable Palm Oil (RSPO) and come from a Segregated (SG) supply chain model.

3.4.2 Soy

- For Samworth Brothers, our soy footprint is primarily formed from embedded soy within animal feed, for ingredients such as meat, eggs, farmed fish and dairy products.
- Samworth Brothers ambition is that all soy used as animal feed in our global supply chain is sourced from areas which are verified as zero deforestation, with a target to source 100% verified deforestation free and conversion free (vDCF) physical soy embedded in our supply chain by the end of 2025.
- We have further strengthened this commitment as we are signatories of the UK Soy Manifesto and are supporters of the Soy Transparency Coalition.
- Supply partner requirements:
 - Where soy is present (directly or embedded within supply chains as animal feed) we require suppliers to be actively working towards the following:
 - **Policy;** a publicly available deforestation commitment (encompassing both legal and illegal deforestation / conversion) to be implemented by the end of 2025, with a cut-off date of January 2020 or earlier; and to cascade the commitment to their suppliers.
 - **Data Requests;** complete data requests, when requested, to help us better understand our soy supply chain.
 - **Soy Transition Plan;** having a detailed Soy Transition Plan in place that outlines your plans to move to verified deforestation and conversion free soy. This needs to be agreed between Samworth Brothers and each relevant supplier, to demonstrate action for full implementation of the commitment by the end of 2025.

Soy Transition Plan Guidance

Please consider the following guidance when working on your transition plan:

- a. Identify the volume of soy in your supply chain, where soy is sourced from and any existing sustainability or deforestation and conversion free claims. This will help to prioritise which of your own suppliers you should engage with first. You may wish to use a conversion factor tool or other footprint calculator, to estimate the volume of soy used in your supply chain based on product weight. The [RTRS Soy Footprint Calculator](#) is one example but others are available.
- b. Identify if any volumes can be traced to a lower risk country of origin (N. America, Europe etc.).
- c. If sourced from a country with a specified/suspected risk, can you provide assurance that the soy isn't linked to deforestation and conversion. This may be through:
 - Proof of certification to a standard benchmarked to the [FEFAC Soy Sourcing Guidelines](#):
 - Segregated certification would be considered verified deforestation and conversion free (vDCF)
 - Mass balance and area mass balance are models which support the production of deforestation and conversion free soy, but do not guarantee that soy is entering a company's specific supply chain entirely meets the standard. This is because these shipments of soy are a blend of soy grown to the standard, and conventional material. For this reason, they are considered transitional tools and should be used to help build volumes of deforestation and conversion free material before moving to fully vDCF supplies by the end of 2025.
 - Alternative, equivalent evidence that verifies soy is deforestation and conversion free will also be considered. For example, the shipper (who first places the soy on the UK market) may have their own verification system in place. Alternative evidence should be independently verified.

3.4.3 Packaging

- We have a responsibility, together with our suppliers, to help prevent environmental problems associated with packaging. We only use packaging where it serves a clear purpose and we are supporters of the UK Plastics Pact, which aims to eliminate problematic plastics, reduce the total amount of packaging on supermarket shelves, and help build a stronger UK recycling system.
- Supply partner requirements:
 - All virgin paper and board packaging should be sourced from sustainably managed forests, to ensure net zero deforestation (FSC or PEFC sources preferred).
 - Work together with us to minimise the overall weight of packaging and to reduce its carbon footprint.

4. RESPECT FOR ANIMAL WELFARE

4.1 Farm Animal Welfare

- The fundamentals of our animal welfare objectives are based on the 'Five Freedoms' outlined by the Farm Animal Welfare Commitment (FAWC). All raw materials supplied to us must support the five freedoms.
 - Freedom from Hunger and Thirst
 - Freedom from Discomfort
 - Freedom from Pain, Injury or Disease
 - Freedom to Express Normal Behaviour
 - Freedom from Fear and Distress

4.2 Eggs

- We have committed to moving to 100% cage-free eggs by the end of 2025.

5. WORKING IN PARTNERSHIP

Samworth Brothers expects Supply Partners to continually improve their performance – from meeting the minimum requirements in the first instance; to achieving good and eventual best practice – and to demonstrate progress.

5.1 Responsible Sourcing Self-Assessment Questionnaire

- We ask specified supply partners to complete our Responsible Sourcing Self-Assessment Questionnaire (SAQ). The purpose of the SAQ is to gather data to help support transparency and collaborative working.

5.2 Responsible Sourcing Programme

- We need to work with supply partners on complex issues. We will do this through our Responsible Sourcing Programme, developing joint plans in collaboration.
- This involves an annual meeting with selected supply partners to discuss your approach to sustainability including both ethical and sustainable sourcing. Suppliers will be informed if they are in scope.

5.3 Reporting Breaches

- We are a business with strong values of responsibility and integrity. We always work to do the right thing.
- We understand the challenge of social and human rights issues in complex global supply chains and that many challenges are systemic in nature and cannot be addressed alone. Consequently, we encourage supply partners to proactively disclose where they are having challenges meeting this policy. This enables us to work together to address issues and strengthen systems for improvement.
- Where any non-compliances are identified, Samworth Brothers approaches remediation in an open and transparent manner and aims to collaborate with its supply partners to resolve issues rather than terminating business relationships. This ensures issues are addressed and any workers impacted obtain access to remedy. However, if we believe a supply partner is not providing appropriate support to remedy issues, we will have no option other than to terminate our business relationship with them.
- We request that the Samworth Brothers Responsible Business Team is contacted if any concerns are brought to your attention: responsiblebusiness@samworthbrothers.co.uk

5.4 Revisions to the Policy

- The Samworth Brothers Responsible Sourcing Policy will be reviewed on a regular basis and updated as necessary. The latest version of the Responsible Sourcing Policy will be made available on the Samworth Brothers corporate website, <https://www.samworthbrothers.co.uk>.

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