

May 2019 | Version 1.0



Responsible Sourcing Policy

Our Policy Position



Overview

Upfield expects its business partners to adhere to values and principles consistent with our own. Upfield is developing new business practices to grow our company and communities, by doing business in a manner that improves lives of workers across our supply chain, their communities and the environment, consistent with the Upfield's Purpose. Our requirements of suppliers (companies that supply Upfield with goods and/or services, across both production and non-production areas of our business) are set out in our **Responsible Sourcing Policy (RSP)**. The RSP affirms the following Fundamental Principles:

1. Business is conducted lawfully and with integrity, in compliance with laws and regulations relating to trade, data protection, privacy, intellectual property, pricing, antitrust and competition.
2. Operations should be compliant with the guidelines laid down in the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.
3. All workers are treated equally and with respect and dignity.
4. Partners should provide equal hiring, employment and promotion opportunities, without discrimination in employment, compensation, advancement, discipline, termination or retirement.
5. Employment is voluntary, and workers are free to leave work or terminate their employment upon reasonable notice. Partners shall not use any prison, slave, bonded, forced or indentured labor.
6. All workers should have the appropriate paperwork to prove they meet the minimum legal age and eligibility criteria to be employed in their respective countries.
7. Working hours for all workers are reasonable, and all work contracts must specify and comply with legally required breaks.
8. Workers are paid fair wages that align with the national or local minimum wage for both full time and contractual work. Wage calculations should be transparent, equitable and objective, including remuneration based on production, quotas, or piecework.
9. Benefits specified in work contracts should comply with mandatory benefits in the country of employment.
10. All workers are free to exercise their right to form and/or join trade unions, and to bargain collectively. Workers who choose to form or join trade unions must not be discriminated against or be intimidated with fear of job loss for joining such organizations.
11. Workers' health and safety are protected at work. Workers must be provided with hygienic working environments with adequate lighting, ambient temperature, ventilation, sanitation and potable drinking water to respect human right to water, sanitary facilities and food storage.

12. All workers have access to fair procedures and remedies and must have the assurance that grievances will be addressed fairly and in a timely manner, and with no fear of reprisal.

13. Land rights of communities, including indigenous people, should be protected and promoted at all times.

14. Business is conducted in a manner which embraces sustainability and reduces environmental impact, while ensuring compliance with all local and national environmental laws, regulations, permitting requirements and reporting standards.

15. Partner businesses should respect all internationally accepted human rights standards.

All Upfield Purchasing Agreements/ Contracts, Master and Local Purchase Agreements or Upfield Master Services Agreements specify that suppliers must acknowledge adherence to our RSP as a condition of supply. This Code Policy sets out responsibilities of Associates who engage with suppliers.

Musts

Associates who contract and/or work with Upfield's suppliers must:

- Read and understand the Fundamental Principles and consult their line manager or the relevant Social Accountability team member if they have any questions;
- Notify their line manager and, if appropriate, the compliance team member if they know or suspect that suppliers are not meeting relevant RSP requirements within the Responsible Sourcing Policy;
- Ensure that any shortlists or tendering processes for new suppliers for which they are responsible consider potential suppliers' credentials in areas covered by the RSP.

Must nots

- Associates who contract and/or work with Upfield's suppliers must not agree to any contractual changes or exclusions with respect to the RSP without consulting their Legal business partner and prior written authorization from the Compliance Officer and Head of Sustainability.

Any exception to these guidelines cannot be made without the express written approval of the Chief Compliance Officer and due notification being provided to the Chief Corporate Affairs and Communications Officer of Upfield.