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# Business Partner Code of Conduct

Policy No.PRO02



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| <b>Policy Number:</b>                 | PRO2   |
| <b>Summary</b>                        | The purpose of this Code is to set out the essential minimum requirements expected from all our business partners with regards to ethical, responsible and sustainable business practices. |
| <b>Applicability</b>                  | All Upfield Associates and Business Partners   |
| <b>Responsible Person</b>             | Chief Procurement Officer  |
| <b>Accountable for Implementation</b> | All Associates   |
| <b>Policy Ratified on:</b>            | 01.04.2021   |
| <b>Next Review Date:</b>              | 01.04.2022   |
| <b>Version</b>                        | 1  |

## 1. Purpose

At Upfield, our purpose is to make people healthier and happier with great tasting, all-natural plant-based products that are better for you and for the planet. Our delicious natural ingredients come from plants, and we are working towards making sure our packaging does too.

Our supply chains stretch around the world starting with the farmers who grow the seeds, fruits, nuts and legumes that we use in our recipes, and then on to the distributors, retailers and innovative chefs who deliver our range of plant-based products to our customers.

At Upfield we aim to create meaningful, long-lasting and sustainable relationships that will benefit economies, communities and ecosystems. We consider our business partners as true partners building a sustainable future for us all and firmly believe that every partner has a critical role to play in helping us achieve our ambition. Only by working together with business partners who are committed to good business practices and action to address social and environmental challenges can we ensure that our long-term growth is built on a platform that is better for people and better for the planet.

The purpose of this Code is to set out the essential minimum requirements expected from all our business partners. Ethical, responsible and sustainable business practices are key to our future success. Please take the time to read this Code and understand our expectation and your responsibilities.

## 2. Policy Statement

### 1. Overview and Scope

As the world pivots towards a more sustainable, natural, healthy and equitable food system, Upfield is committed to working with business partners who are committed to the principles required to build an ethical, responsible and sustainable business.

The Upfield Supplier Code of Conduct (Code) sets out our aspirations and the minimum requirements we expect all our business partners to meet. This Code applies to all our business partners: business partners, contractors, agents and any other party engaged with Upfield. We consider sustainability performance when selecting and prioritizing business partners to work with. Further we are constantly monitoring our own performance and, when being asked, will inform our clients and customers of our progress or about any significant issues.

We expect business partners to promote the principles set out in this Code (or equivalent principles) across their own supply chains, and to have appropriate processes in place to verify and demonstrate that these principles are met.

There are three areas of focus for engagement with our business partners:

- Business Integrity and Ethics
- Human Rights & Social Responsibility
- Environmental Sustainability

In addition to these focus areas, all business partners working with Upfield are expected to comply with all applicable laws and regulations. Where laws and regulation differ from this Code, or are absent, we expect business partners to meet the highest standard either reflected in the applicable law or in this Code. Where this Code conflicts with applicable laws or regulation, Upfield business partners must notify Upfield and establish an agreed and appropriate course of action.

## **2. Business Integrity & Ethics**

At Upfield we want to do business with business partners who share our values of performance passion and care. We will act with integrity and demonstrate good ethical practices in our business dealings, and we demand the highest standards of conduct from all our business partners. A commitment to business integrity, the continual pursuit of improvement forms the foundation for a successful business. We expect our business partners to adopt clear commitments on ethical business practices and require all business partners to adhere to the following minimum requirements:

### **Laws, regulations and trade controls**

We expect our business partners to comply with applicable laws and regulations, including trade sanctions and restrictions issued by recognized authorities (EU, US, United Nations), which are designed to limit trade with certain countries or their nationals.

### **Bribery and corruption**

We expect our business partners to have a zero-tolerance policy to bribery corruption or any type of fraudulent behavior, in any form, everywhere they operate. Business shall be conducted without asking for, engaging in, making, offering, promising or authorizing any bribes.

### **Conflicts of Interest**

Conflict of interests may arise when an employees' personal interest interferes or conflict with their loyalty to their employer. Our business partners must not cause any conflicts of interest for Upfield employees. We expect business partners to disclose in full any potential conflicts of interest so that they can be addressed.

### **Gifts and entertainment**

Giving and receiving of gifts and entertainment has a role to play in building business relationships, however, should never create a feeling of obligation or be perceived as a bribe. We expect our business partners to respect that Upfield employees must not provide or accept excess or inappropriate entertainment and may only offer or accept non-cash gifts of modest value occasionally.

### **Competition and anti-trust**

We expect our business partners to comply with competition and anti-trust laws which apply to their business and ours.

### **Data, Confidentiality & Proprietary Information**

We expect business partners to keep accurate records related to their business with Upfield. Business partners must ensure that all confidential, personal and proprietary information is handled appropriately, safeguarded and managed in compliance with applicable data privacy laws and regulations. Our confidential information must not be disclosed to third parties without prior authorization Information should be used only for its intended business purpose.

### **Responsible Marketing**

We expect our business partners who are engaged in marketing, advertising and promotional activities to do so in a responsible manner. Our commitments are consistent with the Consumer Goods Forum and the International Chamber of Commerce Marketing & Advertising Code and its Framework for Responsible Food and Beverage Marketing Communication.

### **Tax evasion**

We expect our business partners to take a zero-tolerance approach to the criminal evasion of taxes wherever they operate. As a minimum, we expect our business partners to have reasonable procedures in place to prevent the criminal facilitation of tax evasion by their employees or those they transact with in connection with our business.

## **3.Human Rights & Social Responsibility**

At Upfield we want to make a positive contribution to people's lives and to society. We are committed to respecting human rights, ensuring safe and secure working conditions and ensuring we help create positive social impact throughout our direct operations and across our supply chain.

Our Human Rights Statement lays our own commitment to act in accordance with the UN Guiding Principles on Business and Human Rights. We expect all our business partners to respect human rights, adopt equivalent commitments and to

adhere to the following minimum standards. Our principles apply to all workers, associates and employees, including temporary workers, students and interns. We expect our business partners to meet the same principles and expect them to adhere to the following minimum requirements:

### **Child labour**

Business partners must not use or permit any unlawful form of employment or exploitation of children. No individuals are hired under the age of 16 and not lower than the end of compulsory education, or under the legal age of work in accordance with local laws and regulations. No individuals under the age of 18 will perform hazardous work.

### **Forced labour**

Business partners must not use any form of bonded, forced, or involuntary labour. All work must be voluntary, and all workers must have the right to terminate their employment at any time.

### **Wages and benefits**

We expect business partners to pay their employees a fair wage, according to at least the legal minimum standard or appropriate industry standards, whichever is higher.

### **Working hours**

Business partners must ensure that employees do not work excessive hours in accordance with national laws, collective agreements and the provision of International Labour Organization standards on working time. Where laws, agreements or provisions are absent normal working hours should not exceed 60 hours per week including overtime. At least 24 consecutive hours of rest should be allowed every seven days, unless mutually agreed otherwise. Overtime is regulated in compliance with the law and is voluntary.

### **Working conditions**

We expect business partners to ensure the safety of their workplace in accordance with all applicable laws and regulations. Business partners will make sure workers have access to clean toilet facilities, potable water and adequate hygiene facilities. Where business partners provide workers with housing facilities, these will be clean and safe and will guarantee adequate living conditions.

### **Freedom of association and collective bargaining**

We expect business partners to respect the right of employees to join, or not join, or form a labour union in accordance with the law and without fear of reprisal or intimidation.

### **Land rights**

We expect our business partners to respect the land rights of local farmers, communities and indigenous peoples. Business partners will have all the relevant documents to prove their right (legal title or legal lease) to operate on the land their

operations are located on and should not have any on-going legal processes or events indicating that the ownership or lease right to the land is contested.

### **Health & safety**

We expect business partners to meet applicable health & safety laws and regulations. Business partners are expected to have a Health & Safety policy in place and a robust approach to safety management. Business partners will train the workers about potential exposure to hazards and will provide them with appropriate PPE, where health and safety hazards and exposure cannot be eliminated or controlled by other means.

### **Harassment and abuse**

We expect that business partners will not permit harassment, abuse, intimidation, bullying or inhumane treatments of employees including through the threat of punishment or disciplinary actions.

### **Diversity and inclusion**

We expect our business partners to treat employees fairly, encourage a diverse and inclusive workforce and not discriminate on factors such as race, gender, colour, caste, religion, ethnicity, sexual orientation, disability, age marital status, health, pregnancy, union membership, political affiliation, or national origin.

### **Grievance & access to remedy**

Business partners will ensure that a robust grievance and complaints process is in place where employees can anonymously raise their concerns in relation to any matter described in this Code. In addition, the business partner will ensure that the grievance procedure is broadly communicated within its company and that any report filed under this scheme will be treated confidential and in line with industry business standards. Upon request of Upfield, business partner will provide information about the complaints raised and how they were dealt with.

## **4.Environmental Sustainability**

Upfield is committed to addressing the environmental impact of our business from our own operations and distribution, to sourcing sustainably grown ingredients in line with our Responsible Sourcing Policy and by innovating plastic free sustainable packaging. We want to build a supply chain with partners who can demonstrate that they are tackling their environmental impacts and are committed to helping address global challenges including climate change, deforestation, plastic pollution, soil degradation, water scarcity and food waste.

We expect our business partners to adopt commitments on environmental sustainability in order to address their own material environmental impacts. We expect all business partners to adhere to the following minimum requirements:

### **Compliance with the law**

All our business partners are expected to comply with the law and must obtain and maintain all environmental permits, approvals and registrations, required to run their operations. We expect business partners to meet all public reporting requirements

related to environmental disclosures including those related to climate and material environmental impacts.

### **Environmental management**

We expect all our business partners to operate in an environmentally responsible manner. Business partners must understand their environmental impacts, establish and implement appropriate environmental policies, where applicable have management systems in place and set targets to manage their material environmental impacts.

### **Climate change & greenhouse gas emissions**

We expect all our business partners, regardless of size or sector, to play their part in tackling climate change. Business partners are expected to understand their climate impacts and risks; Where greenhouse gas emissions are identified as a material risk, business partners are expected to set policies and targets to reduce their greenhouse gas emissions. We encourage our business partners to set targets that reflect the urgency of climate change and are in line with appropriate national, international and sectoral guidance where applicable.

### **Deforestation**

We take a zero-tolerance approach to deforestation and we expect our business partners to do the same. We purchase 100% sustainably sourced palm oil, soybean oil and paper from sustainable certified sources (RSPO, FSC and Sustainable Soy).

We expect all our business partners to understand their deforestation impacts and to implement robust no-deforestation policies where deforestation is a material risk.

### **Packaging pollution**

We are committed to tackling all unnecessary packaging in our products and supply chain, innovating plastic free sustainable packaging solutions and addressing plastic pollution. We expect our business partners to understand their potential plastic pollution impacts and where significant to set policies and targets to address these impacts. We encourage our raw materials and ingredients business partners to explore ways of reducing and phasing out unnecessary plastic packaging involved in all stages of delivering goods to Upfield. Business partners are encouraged to make all packaging entering our operations reusable, recyclable or compostable.

### **Sustainable Agriculture**

We are reliant on healthy and resilient ecosystems to grow the natural ingredients we use in our products. We expect business partners of natural ingredients to adopt approaches that are in line with sustainable agricultural practices, working towards the most efficient production of safe, high quality agricultural products, in a way that protects the natural environment improves the social and economic conditions of farmers, their employees and local communities and ensures animal welfare.

### **Water scarcity**

Our supply chains stretch across the world including in areas of water stress and scarcity. We expect our business partners to understand their water impacts and risks. Where water is a material impact set policies and targets to reduce water consumption and protect water sources particularly in areas of water scarcity and water stress.

### **Food waste & resource use**

We believe that no good food should go to waste and that we must use resources responsibly. We are committed to addressing food waste and maximizing resource efficiency in our own operations and across our supply chain. We expect our business partners to identify their material waste streams and to set policies and targets to maximize resource use and minimize waste - redistributing, reusing, recycling and recovering as much as possible.

## **5.Implementation**

### Demonstrating compliance

Business partners are expected to have appropriate policies, procedures and management system(s) in place to perform their business in accordance with the principles listed in this Code.

Upfield reserves the right to request information and evidence, from our business partners in order to confirm their compliance with these principles and, where necessary, may require a business partner to undergo on-site direct, or third part audit on the business partner's and/or their subcontractor's facilities. If non-compliances are identified as a result of an audit, Upfield reserves the right request corrective actions plan and subsequent timely improvements.

Business partners will notify Upfield of any legal actions against them by the authorities, or any legal infractions concerning environmental laws, human rights, bribery and anti-corruption. We reserve the right to request and receive additional information concerning the relevant issues.

### Further information

For further information please visit our website [www.upfield.com](http://www.upfield.com) to access copies of our Code of Conduct, Responsible Sourcing Policy, Human Rights Statement, Sustainability and Responsibility commitments and ingredient specific policies. If you have any queries on the content of this Code, please speak with your Upfield contact.

**Ends**

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