

## **Supplier + Third Party Code of Conduct**

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### **INTRODUCTION**

This Code of Conduct sets out the minimum ethical and environmental standards Finnebrogue expects from all suppliers. For the purposes of this document, the term *supplier* refers **raw material suppliers** (tier 1 ingredient and packaging suppliers), as well as **third-party goods and service suppliers** (vendors, contractors, consultants, and agents).

**All suppliers are expected to read, understand, and sign this document as part of the supplier onboarding process.** Any breaches of this Code of Conduct may result in Finnebrogue ceasing to trade with the supplier. Please note this Code of Conduct has cross-departmental relevance and as such this document should be shared with all appropriate teams within your organisation before being signed and returned.

At Finnebrogue, we aim to work collaboratively with our suppliers to ensure that our shared objectives on ethical standards and environmental stewardship are achieved. As such we welcome any queries and communications.

This document should be read alongside Finnebrogue's:

- **Human Rights Policy**
- **Modern Slavery Policy**
- **Sustainable Sourcing Policy**
- **Deforestation and Land Conversion-Free (DCF) Policy for Palm Oil and Forest-Risk Commodities**

## KEY TECHNICAL REQUIREMENTS

Finnebrogue are fully committed to Food Safety, Legality, Authenticity and Quality and to processes which facilitate the continual improvement of food safety and quality management systems across all sites and our supply chain. Finnebrogue takes measures to ensure that it works with suppliers who have this same approach. This promotes strong, mutually beneficial relationships with suppliers of goods and services in order to enhance the ability of both. This assists in providing the best service for our customers and end consumers. **To ensure this we require suppliers to comply with the following supplier expectations:**

| Expectation                                                                                                                                                                                                                                        | Applies to             |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
| BRC or equivalent GFSI standard Approved (Mandatory)                                                                                                                                                                                               | Raw material suppliers |
| All manufacturing sites involved in the production of raw materials for Finnebrogue are nut and sesame seed free (Mandatory)                                                                                                                       | Raw material suppliers |
| The Supplier agrees to submit ingredient and packaging specification information through our online Foods Connected platform (Mandatory)                                                                                                           | Raw material suppliers |
| Before placing an order, the supplier must provide a list of all factories they and their sub-contractors will use for production. Once the order is confirmed, this list cannot be changed without written approval from Finnebrogue. (Mandatory) | Raw material suppliers |
| The supplier must ensure and monitor that all factories and sub-contractors in the Finnebrogue production chain comply with this Code of Conduct (Mandatory)                                                                                       | Raw material suppliers |
| Any changes to ingredient and packaging specification information must be declared to Finnebrogue, and specification must be updated on the Foods Connected platform (Mandatory)                                                                   | Raw material suppliers |

## ETHICAL STANDARDS

Finnebrogue respects and acknowledges internationally recognised human rights principles. Within our company and throughout our supply chain, we are committed to treating people with dignity and respect. **To ensure this we require suppliers to comply with the following supplier expectations:**

| Expectation                                                                                                                                                                          | Applies to                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| Sedex membership/registration (Mandatory)                                                                                                                                            | Raw material suppliers                                           |
| ETI (Ethical Trading Initiative) compliance (Annex 1) (Mandatory) – within your own operations. Suppliers are expected to comply with the ETI Base Code within their own operations. | Raw material suppliers / Third-party goods and service suppliers |

|                                                                                                                                                                                                                    |                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| ETI (Ethical Trading Initiative) compliance (Annex 1) (Mandatory) – through the supply chain. Suppliers are also expected to ensure these same standards are cascaded and followed throughout their supply chains. | Raw material suppliers / Third-party goods and service suppliers |
| Membership to Stronger together (Strongly Advised)                                                                                                                                                                 | Raw material suppliers                                           |
| To comply and document compliance with employment and human rights laws in the jurisdictions of operation (Mandatory)                                                                                              | Raw material suppliers, Third-party goods and service suppliers  |
| Ensure company's sales and management activities are carried out transparently and correctly recorded in the company's registers.                                                                                  | Raw material suppliers, Third-party goods and service suppliers  |
| Ensure action is taken against all forms of corruption, extortion, embezzlement and bribery;                                                                                                                       | Raw material suppliers, Third-party goods and service suppliers  |
| To comply with Finnebrogue's Supplier Expectations outlined in Finnebrogue's Sustainable Sourcing Policy related to human rights (Mandatory)                                                                       | Raw material suppliers, Third-party goods and service suppliers  |
| Ensure all raw materials supplied to Finnebrogue are not sourced from areas indicated on Finnebrogue's Prohibited Sourcing Country of Origin list (available on request)                                           | Raw material suppliers, Third-party goods and service suppliers  |

**Note:** The ETI Base Code is located in Annex 1

## ENVIRONMENTAL STANDARDS

At Finnebrogue, doing what's right for people and planet is integral to everything we do. The **Bigger Picture** is our programme to produce food that doesn't cost the Earth. Seeing the Bigger Picture means we are committed to conducting business in ways that respect and preserve the environment, protect human rights, and promote the well-being of all workers in our supply chains. We strive to work with suppliers who share our commitment to ethical conduct, social responsibility, and environmental stewardship. **To ensure this we require suppliers to comply with the following supplier expectations:**

| Expectation                                                                                                                         | Applies to                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| To comply with environmental laws in the jurisdictions of operation (Mandatory)                                                     | Raw material suppliers / Third-party goods and service suppliers |
| Measure Scope 1 and 2 emissions (Mandatory); and Scope 3 emissions (Strongly Advised)                                               | Raw material suppliers / Third-party goods and service suppliers |
| To comply with Finnebrogue Deforestation and Land Conversion-Free (DCF) Policy for Palm Oil and Forest-Risk Commodities (Mandatory) | Raw material suppliers / Third-party goods and service suppliers |

|                                                                                                                                                                                      |                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| To comply with Supplier expectations outlined in Finnebrogue's Sustainable Sourcing Policy related to the Environment (Strongly Advised)                                             | Raw material suppliers                                           |
| To monitor and lessen the environmental impact across including, but not limited to, Water, Waste, Energy, Carbon, Sustainable Sourcing, Biodiversity, and Deforestation (Mandatory) | Raw material suppliers / Third-party goods and service suppliers |
| Sign up to the All-Ireland Pollinator Plan (AIPP) if Ireland-based (Strongly Advised)                                                                                                | Raw material suppliers / Third-party goods and service suppliers |

## ACKNOWLEDGEMENT

Finnebrogue reserves the right to update and reissue this Code of Conduct and will communicate any changes to suppliers. Suppliers are expected to monitor compliance with this Code of Conduct and, if any breaches are detected in their own operations or within their supply chain, to identify the underlying causes, implement corrective measures in line with national laws, local customs, and international employment standards, and report this breach and corrective actions to Finnebrogue.

In cases where non-compliance is identified during supplier approval or ongoing performance monitoring, Finnebrogue's senior leadership team may approve suppliers who do not fully meet certain aspects of the Code of Conduct, provided that suitable alternative measures and evidence are presented to ensure that technical, ethical, and sustainability standards are upheld and corrective action have been Implemented.

If you have any questions, please contact **SupplierEngagementTeam@finnebrogue.com**.

**Please sign and return this Code of Conduct to acknowledge receipt, understanding, and compliance with its requirements.**

### Supplier Signature:

Name: \_\_\_\_\_ Role: \_\_\_\_\_ Date: \_\_\_\_\_

### Finnebrogue Signature



Name: Andrew Nethercott Role: Chief Executive Officer Date: \_\_\_\_\_

## **APPENDIX**

### **Annex 1- ETI Base Code**

#### **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.

#### **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.

#### **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.

#### **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.

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

### **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.

### **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.

6.4 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.

### **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.

### **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.

### **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.