

Greencore

RESPONSIBLE SOURCING CODE OF CONDUCT

Introduction & Purpose

At Greencore, we don't just want to be proud of what we do and how we do it, but we also want to be proud of the impact we have on those around us and the world at large. We strive to be a truly sustainable business and have developed a sustainability strategy that is changing the way we work.

Sustainability is one of the core pillars of The Greencore Way. We want to work with suppliers who care about doing business responsibly. The Greencore Responsible Sourcing Code of Conduct (the "Code of Conduct") sets out the behaviours, practices and standards we expect from our suppliers. In sharing our Code of Conduct with our first-tier suppliers we make our expectations clear, aligning our suppliers with our standards and ensuring that we work with partners that share our beliefs.

Our Code of Conduct is built upon international and national guidance and legislative frameworks, with a particular emphasis on the requirements for supply chain transparency (taking account of the definition in the Modern Slavery Act 2015 and the forthcoming EU Directive on Mandatory Human Rights, Environmental and Good Governance Due Diligence). This Code of Conduct is intended to be read alongside the Greencore Code of Ethics and Business Conduct, which we also expect our suppliers to act in accordance with.

It is our intention to work with those suppliers that are aligned with our vision and values, and we expect our suppliers to replicate these standards further down their own supply chains. Our success in reaching these goals will be verified by ongoing supplier analysis and monitoring. The principles expressed in this Code of Conduct are intended to become an important component of supplier selection and evaluation.

Scope

Our Code of Conduct defines our expectations for our direct (Tier One) suppliers. We expect all suppliers to work with us to comply with both the letter and the spirit of this Code of Conduct – 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 demands 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.

Reference:	Version number:	Owned by:	Approved by:	Date:
Responsible Sourcing Code of Conduct	1.0	Sustainability Team	Purchasing Director	December 2022

Fundamental Principles

Greencore 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 Code of Conduct. 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.

Human Rights

Our fundamental principles are based upon the ETI Base Code (available in full online at www.ethicaltrade.org/eti-base-code) and are also summarised in the Greencore Code of Ethics and Business Conduct. Furthermore, it is an absolute expectation that suppliers will support our work to comply with section 54 (transparency in supply chains etc., requirements) of the Modern Slavery Act 2015 and will in turn be fully compliant with this Act themselves, as appropriate.

- **1.1 Compliance with the ETI Base Code** - the ETI Base has the following requirements that suppliers must comply with:
 - Employment is freely chosen
 - Freedom of association and the right to collective bargaining are respected
 - Working conditions are safe and hygienic
 - Child labour shall not be used
 - Living wages are paid
 - Working hours are not excessive
 - No discrimination is practiced
 - Regular employment is provided
 - No harsh or inhumane treatment is allowed

- **1.2 Transparency in Supply Chains**

The Modern Slavery Act (2015) includes a demand for transparency in supply chains (Section 54). All suppliers must provide Greencore with timely and detailed supply chain data when requested, that will demonstrate the steps being taken to address Modern Slavery in their own business and in their supply chains.

- **1.3 Demonstrating Compliance - reporting, monitoring and audits**

Compliance can best be demonstrated by linking to Greencore on the Sedex platform and completing the Sedex self-assessment questionnaire. Third-party proof of compliance can be demonstrated through a SMETA audit. SMETA audits may be required of suppliers by Greencore on a case by case, risk assessed, basis.

- **1.4 Supply Chain Transparency**

Greencore will use data submitted via the SEDEX platform to inform our Modern Slavery Statement. Additional data requests may be made on a case by case basis as a result of emerging risks or elevated risk assessment scores. The full and detailed support of suppliers in such cases is required.

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Responsible Sourcing Code of Conduct	1.0	Sustainability Team	Purchasing Director	December 2022

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Environmental Sustainability

We expect our suppliers to collaborate to play their part in the achievement of our sustainability objectives. The following fundamental principles outline our expectations, although additional requirements may develop as our sustainability agenda progresses.

- **1.5 Sustainability Data Transparency:**
 - Supporting Greencore in our sustainability reporting by providing accurately and timely information, on request. Suppliers must share the details of their supply chains when requested, and ensure that this transparency includes multi-tier supply chains, where relevant, and any international supply chains. Suppliers can meet this requirement by completing our Responsible Sourcing Supplier Questionnaire, on an annual basis.

- **1.6 Deforestation:**
 - **Soy;** our 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% deforestation free and conversion free physical soy embedded in our supply chain by 2025. In order to achieve this, where soy is present in supply chains (directly or embedded within supply chains as animal feed) we expect suppliers to:
 - have a publicly available deforestation and conversion-free commitment (encompassing both legal and illegal deforestation / conversion) with a cut-off date of January 2020 or earlier; and to cascade the commitment to their suppliers.
 - Have by a detailed **Soy Transition Plan**, agreed between Greencore and each relevant individual supplier, to demonstrate action for full implementation of the commitment by 2025.
 - **Palm Oil;** all palm oil used in Greencore products must be physically certified to Roundtable on Sustainable Palm Oil (RSPO) and come from a Segregated (SG) supply chain model.

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Responsible Sourcing Code of Conduct	1.0	Sustainability Team	Purchasing Director	December 2022

Best Practice Principles

In addition to our fundamental principles, we have defined best practice principles that our most engaged suppliers will be embracing to enable us to meet our sustainability goals. Not all practices will be relevant to all suppliers, however, there is an expectation that suppliers should appropriately assess the relevance to their own company and supply chains.

- **2.1 Hotspot Identification**
 - Suppliers should have an understanding of the detailed sustainability hotspots relevant to your business, and a risk assessment process to define risk levels.
- **2.2 Carbon Reduction target**
 - Suppliers should set their own carbon reduction target, in line with climate science and approved by the Science Based Target Initiative, for scope 1, 2 and 3 emissions.
 - Suppliers are encouraged to adopt a no-air-freight approach to sourcing, or have a detailed evidence-based understanding of items that require air freight.
- **2.3 Deforestation**
 - Suppliers of animal proteins are encouraged to become signatories of the UK Soy Manifesto, in order to support our commitment to “deforestation and conversion free soy”.
 - Paper and Pulp; all virgin paper and board packaging should be sourced from sustainably managed forests, to ensure net zero deforestation.
- **2.4 Water Risk**
 - Suppliers should complete a water footprint of your supply chain, understanding of sourcing risk from high-risk locations (i.e South Africa, Kenya, Spain & UK regions of Kent, East Anglia, Wye & Usk).
- **2.5 Food Waste**
 - Suppliers should set food waste reduction targets in line with the WRAP Food Waste Reduction Road Map or similar. Suppliers are also encouraged to publicly report on food waste, in line with WRAP guidance.

Our expectation is that all suppliers will identify the most critical sustainability issues faced by their operations and their supply chains. There will inevitably be challenges in addressing these issues, and such challenges can only be addressed if suppliers communicate with Greencore in an honest and transparent manner. If there are areas of this document or other Greencore policy statements that a supplier is not complying with, it is the supplier’s responsibility to inform Greencore of this as a matter of urgency. We will be supportive of suppliers who are willing to share issues with us and work together to build more sustainable practices.

Get in touch with your questions, we would love to hear from you, email: sustainability@greencore.com

You can access our corporate website sustainability downloads here:

<https://www.greencore.com/sustainability/sustainability-hub/>

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