



macphie

Supplier Code of Conduct

Food. We think about it. We breathe it. And we live it.

Introduction

Macphie is an internationally renowned family ingredient manufacturer, producing a wide range of products across our core categories of sauce, bakery and ice cream inclusions, as well as offering plant-based and gluten-free options. As a partner to some of the world's leading food brands, we're dedicated to turning ideas and creativity into practical solutions.

Since our origins we've stood out in the industry because of our innovation, imagination and invention. It's what makes us different, it's why customers come to us. We're relied on by one another and customers, to do what we say, when we say we're going to do it. The quality of our products, our processes, our support, everything we do should be underpinned by this.

Our ways of working have always been based on the principles of sustainability. We want to make a positive impact on both our local and wider environment, building practises of doing the right thing to protect the people and places around us. Proving we're not just talking the talk when it comes to sustainability, we are B Corp accredited. Since 2015 we've aligned our ambitions to hit social and environmental goals, as well as financial targets, committed to continuous improvement across five key pillars: Governance, Customers, Communities, Workers, Environment.

In order to achieve our ambitions, we recognise that we can not do this single handedly. Recognising the important role of our suppliers in our value chain, we therefore reach out to you, our suppliers, to support us on this journey.

Our passion. Our motivator. Our obsession.

Simply Clever Food

Scope

This supplier code applies to all suppliers and their employees, suppliers and sub- contractors providing products, materials, expertise and related services to any entity of Macphie. We want to ensure that suppliers are clear about our expectations, embrace and adopt our values, drive standards and deliver on our objectives of trading ethically and responsibly.

This Supplier Code of Conduct sets out the minimum standards we expect from you and we encourage all our suppliers to go beyond these minimum requirements. In line with this, suppliers should understand and comply with the terms of the Supplier Code of Conduct, as detailed within this document.

You should also ensure your own supply chains comply in a manner consistent with these principles and values as a minimum requirement of doing business together. Doing so will reduce risk for us, our customers and our suppliers, encourage a more resilient, collaborative, safer and transparent working relationship, which will have a positive impact on society.

Compliance

The supplier ensures that all products, materials and services supplied to Macphie shall strictly meet the agreed requirements and specifications and be compliant with all applicable laws and regulations. This includes compliance with the International Labour Organisation ("ILO") Core Conventions. It is the supplier's responsibility to maintain and enforce these standards within its own supply chain.

The supplier shall keep adequate records on direct suppliers and is able to trace volumes back to supplying sites. The supplier must immediately inform Macphie if it becomes aware of any fact or suspicion that may indicate a regulatory, quality, safety or labeling issues affecting the supplied products.

Prevention of bribery and corruption

The supplier shall comply with all applicable anti-bribery, laundering and corruption legislation, where this does not exist or is to a lesser standard than prescribed under the UK Bribery Act 2010, then the UK Bribery Act 2010 will prevail. The supplier will have in place, and reviewed regularly, anti-bribery and corruption policies that are designed to prevent any infringement of applicable law.

The supplier shall not engage in bribery or other corrupt or unlawful practices to advance the supplier's or Macphie's business interests or to influence the acts or decisions of relevant decision makers, including government officials as well as private individuals. This includes any advantage offered to Macphie employees in any form (kickbacks, facilitation payments or other) for delivering services for Macphie.

Adherence to sanctions

The Supplier shall conduct its business in a manner that will not result in the Supplier or Macphie being in breach of any applicable trade sanctions and embargoes.

Fair competition

The supplier conducts its business in compliance with applicable competition and anti-trust laws. The supplier shall not engage in any unlawful practices, including but not limited to price fixing, market sharing and market splitting, sharing of confidential and commercially sensitive information or agreeing to limit sales or outputs for the purpose of restricting or deferring the fair competition and free market, notably when acting in concert with third party competitors.

Confidentiality

The supplier shall keep strictly confidential any commercial, operational or technical information in respect of Macphie and shall not without the prior written consent of Macphie, disclose to any persons, or grant access to any person, any confidential information for any other purpose than as required for the successful performance the supplier's contractual obligations.

The supplier shall safeguard and respect Macphie's intellectual property rights. Any licensed intellectual property rights shall only be used for the intended and designated purposes.

Data privacy

The supplier shall comply with all applicable legislation in relation to data privacy. The supplier shall apply the privacy principles of lawful, fair and transparent data processing, respecting any purpose limitations, as well as the principles of data minimisation, accuracy, storage limitation, integrity and confidentiality. The protection and responsible use of personal data is reflected in Macphie daily operations with employees, customers and suppliers. Macphie are committed to collecting and using personal data in a lawful, fair, legitimate and ethical way.

ETI Base Code

Macphie is committed to complying with the ETI Base Code. The supplier shall familiarise itself with this ETI Base Code and shall ensure in supplying Macphie it does not do anything or neglect to do anything that would cause Macphie to breach its obligations under it.

SEDEX

Suppliers shall be SEDEX registered, including each of the appropriate subsidiary sites or manufacturing sites that supply goods to Macphie. These businesses would also need to be linked to Macphie Ltd (ZC1038745) allowing access to appropriate audit data. It is the responsibility of each supplier to fully complete the Self- Assessment Questionnaire ("SAQ"), followed by an annual review to ensure the accuracy of the information detailed in the SAQ and relevant contact details are up to date.

Freely chosen employment

All employment must be freely chosen. Forced, bonded, indentured labor and any other form of slavery or human trafficking are prohibited. This includes that the Supplier ensures that throughout the hiring process no monetary deposits or legal documents such as original identification documents are collected from employees and also abstains from any other activity that creates involuntary dependency. The supplier furthermore ensures that the workers' freedom of movement does not get restricted in any way and that workers are free to leave the premises. Involuntary prison labor is not to be used. All work will be voluntary, and workers must be free to leave upon giving reasonable notice.

Where labour providers are used suppliers shall only contract with labour providers which have an identifiable and distinct legitimate business entity where worker contracts will be held within this legal entity. Suppliers shall ensure that their labour providers possess all up-to-date licenses or permits required by national law in all sectors and in all countries of operation. There shall be senior management approval for the use of a labour provider and protocols and specific policies which define expectations and processes for worker issue remedy. Suppliers shall have a process for annual second party audits of their labour providers or alternatively by an agreed globally recognised scheme.

Within the UK, suppliers shall ensure that all labour providers used to supply workers are licenced by

the Gangmasters and Labour Abuse Authority and that the supplier has registered for the GLAA's Active Check Service for every labour provider which they use, ensuring they are covered by the GLAA licence.

Modern Slavery

Suppliers shall have in place appropriate policies, processes, including a robust risk assessment of their supply chain, and procedures to identify and mitigate any instances of modern slavery both within its own business and more widely within its supply chain.

Macphie is committed to ensuring it tackles modern slavery within its business operations and supply chain and will prepare and publish its annual statements to comply with the Modern Slavery Act 2015 and the timelines defined therein.

Where lawful to do so, the supplier shall inform Macphie immediately if it becomes aware of or has reason to believe that it or any of its officers, employees, agents or subcontractors have or have potentially breached the Modern Slavery Act 2015. The report shall set out full details of the breach or potential breach of its obligations.

No child labor and protection of young workers

The Supplier shall not recruit or engage the use of child labor and respects and realizes the principles of ILO Convention No. 138, on the minimum age for admission to employment and work, and ILO Convention No. 182, on the worst forms of child labor. The term "child labor" refers to work that is mentally, physically, socially, or morally dangerous and harmful to children, and interferes with their schooling.

When employing workers below the age of 18, the Supplier shall demonstrate that the employment of young workers does not expose them to undue physical risks that can harm physical, mental or emotional development. The supplier shall implement management systems to monitor and address the risk of child labor in its supply chains. When cases of child labor are identified, the Supplier shall take responsible remediation measures. The supplier shall immediately remove the child from the situation causing harm, ensuring that such measures do not worsen the wellbeing of the affected child and its dependents. Additionally, the Supplier shall engage with local governments, NGOs and other stakeholders in order to address the underlying issues of child labor prevalence.

Freedom of association

The Supplier respects the legal rights of employees, as applicable, to join or to refrain from joining worker organizations of their choice, including trade unions, and to bargain collectively.

Payment of appropriate and legal wages

All workers, directly or indirectly contracted for work by your business, shall receive a fair wage and benefits for the work which they undertake which meets or exceeds any national minimum wage legislation, all applicable laws regulations and industry guidelines.

All workers shall be provided with written documentation regarding their terms and conditions, how their pay is calculated in a manner that is understandable and agreeable, being reviewed and updated as is applicable. Payslips shall clearly show the hours worked, any agreed deductions, the hourly rate and total payment made. Wherever possible payment shall be made directly into a bank account identified as belonging to the worker, with wages paid regularly and on time. Deductions from pay as a means of a disciplinary process will not be accepted, except for local law exceptions and these deductions are to be agreed and documented with the worker concerned.

Prevention of excessive working hours

The supplier shall ensure working hours are determined by local laws or standards whichever provides the greatest protection to the workers involved, with respect to the number of working hours per day and the number of days worked in a week. All overtime must be voluntary.

No discrimination

All employment shall be given on the basis of equal opportunity and fairness, with workers free to find alternative employment if they require without threat or sanction. All work shall be voluntary, there shall be no discrimination against any potential worker in hiring, compensation, access to training, promotion, pension, or other benefits based upon race, caste, ethnicity, religion, age, gender, marital status, sexual orientation, disability, union membership or political affiliation.

Suppliers shall have a policy that explicitly bans discrimination/bullying and harassment based on sexual orientation, race, gender or gender identity/expression.

Respect, dignity, no harsh or inhumane treatment

The supplier shall treat all employees with respect and does not engage in or support the use of physical punishment, threats of violence, verbal, physical, mental, sexual or any other form of abuse or harassment. The supplier shall have a procedure in place to identify and support workers affected.

Reporting Concerns

Suppliers shall have in place a mechanism ("Whistleblowing") which allows workers to raise any work-related concerns which they may have without retribution to an appropriate level of management and anonymously if required. The Whistleblowing mechanism shall be transparent, set out clearly how grievances will be assessed, and feedback provided.

Workers and their representatives shall be informed clearly how the scheme operates and its scope and that it is equally accessible to all workers.

Discipline and grievances

The supplier shall communicate that existence and scope of the grievance mechanism to all workers and their representatives. This grievance mechanism shall be available to permanent, indirectly employed, and temporary workers.

Disciplinary procedures shall be clearly documented, communicated and easily accessible to all workers. All disciplinary matters shall be recorded including evidence that the worker knew and understood what was accused and given the right to trade union or other appropriate representation at disciplinary meetings which may lead to significant disciplinary penalties or dismissal.

Safe and healthy working conditions

The supplier shall provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Adequate steps shall be taken to prevent accidents and injury to health in the course of work, by minimising the causes of hazards inherent in the work environment. The supplier shall protect employees from exposure to hazardous materials and provides personal protective equipment to workers where required free of charge.

All workers shall have access to clean toilets, washing facilities and potable water and, if appropriate, hygienic storage conditions for food and drink.

All facilities provided for use by employees, including accommodation, are clean, safe and in line with

local laws. The provision of accommodation shall not restrict workers freedom of association or their ability to find alternative employment and be provided with equal opportunity and be non-discriminatory. The costs of such accommodation shall be reasonable and not force the workers into debt. There must be a documented audit process to verify the appropriate standard of accommodation.

The Supplier shall also ensure emergency preparedness, including adequate provision, signage and communication of emergency exits and procedures. Employees are regularly trained to ensure they are adequately protected.

Environmental Management

The Supplier shall meet all applicable legal environmental requirements. The Supplier shall also obtain, keep and update all required environmental permits and registrations.

Environmental impact

The supplier shall minimise its negative impacts on the environment, particularly on climate and biodiversity and implements measures to protect soil and water bodies. The supplier shall use natural resources sustainably. The supplier shall implement relevant measures, and among others actively apply better production processes and technologies in order to reduce its environmental impact.

Emissions

The supplier shall actively manage its emissions, especially with regards to greenhouse gases. This includes efforts and strategies to measure and reduce the companies' emissions.

Deforestation and biodiversity

The Supplier shall ensure that its operations do not directly contribute to deforestation or loss of biodiversity. The Supplier shall conduct due diligence on commodities associated with deforestation in its supply chain. Prior to establishing new operations or expanding existing ones, in addition to obtaining all legal concessions, the Supplier shall conduct due diligence which combines biodiversity, carbon conservation, and social considerations.

The Supplier shall commit to deforestation-free operations and supply chains, has systems in place to monitor compliance and progress of its supply chain with regards to this commitment and takes immediate actions in case of breaches.

Respect for the Rights of Indigenous and Local Populations

The Supplier shall respect the rights of indigenous communities and the local populations in the places where it operates as well as in its supply chain. The Supplier applies the UN-principle of free, prior and informed consent (FPIC).

Implementation of the Supplier Code

Supply Chain

The supplier shall actively communicate the provisions in this code to its own suppliers and is expected to initiate, maintain and verify a process of continuous improvement towards sustainable practices in the entire upstream supply chain, in line with the requirements and principles set forth in this document.

Implementation Guidance

In order to ensure compliance with all the topics of the Supplier Code, the Supplier shall:

- formulate policies
- define and assign roles and responsibilities
- implement procedures
- communicate on these topics to employees and relevant third parties
- provide sufficient training to its employees and subcontractors
- monitor the compliance to the policies and procedures
- implement corrective actions
- report on its progress on these topics

Notification on breaches of the Supplier Code

The Supplier is encouraged to respond if it has fair reason to believe that Macphie's employees or its agents or sub-contractors engage in wrongful acts including but not limited to financial irregularity or inaccuracy, fraud, anti-competitive or corrupt practices or violations of significant labor, health, safety or environmental requirements. Such acts should be reported to Macphie at the email address: quality.standards@macphie.com

Monitoring Compliance

We expect the Supplier to take all necessary steps to inform its employees, suppliers, agents and sub-contractors of the principles set forth in the Supplier Code and to take appropriate action to ensure understanding of and compliance with its principles. Macphie expects the Supplier to maintain necessary documentation to demonstrate compliance with the principles stipulated in this Supplier Code and reserves the right to audit the Supplier's compliance with these principles.

Ideally, suppliers shall undergo a SEDEX audit and share it with Macphie through the Sedex platform. If areas of non-compliance are observed, the Supplier will be asked to take corrective action. In the event that the Supplier fails to do so in a timely manner, Macphie may terminate its business relationship with the Supplier.

Revisions to the Supplier Code

Macphie Ltd. will review the supplier code on a regular basis and update as necessary. The latest version of the Supplier Code will be posted on the Macphie website www.macphie.com.

We the undersigned hereby confirm that:

- We have received and taken due note of the Macphie Supplier Code, as of January 2024.
- We are responsible for being aware of all relevant laws and regulations of the country or countries in which our company operates.
- We will inform Macphie Ltd., in case of conflict between provisions of the Supplier Code and any applicable laws or regulations in our countries of operation.
- We will observe and conform to the Supplier Code.
- We will communicate as appropriate to our employees, suppliers, agents and subcontractors the terms of the Supplier Code and ensure that they comply with the provisions.
- We will provide upon Macphie's request the relevant documentation supporting our compliance with the Supplier Code provisions.

Name _____

Title _____

Signature _____

Name of company _____

Company address _____

Date _____

The requirements and expectations set out herein are in addition to, and not in lieu, of any other requirements, standards, regulations, manual and expectations applicable to the relevant Supplier. They are in no way intended to replace, limit or supersede any contractual arrangements between the Suppliers and Macphie Ltd., but are by their nature intended to supplement any such contractual arrangement.