



ABP FOOD GROUP Code of Conduct for Ethical Trade

CONTENTS

- **ABP Food Group Code of Conduct for Ethical Trade**
- **Scope**
- **Our Principles**
- **Code of Conduct**

ABP Food Group Code of Conduct for Ethical Trade

Scope

The requirements outlined in this document are in addition to all applicable Irish, UK, EU and international legislation and industry best practice. ABP Food Group suppliers must ensure that they meet all requirements laid down in law at the point of manufacture and where they are finally sold to the customer. While the requirements set out below are intended to help you supply products suitable for ABP Food Group, they do not absolve you of your responsibility to understand and comply with all the quality, legal and safety requirements for your products.

Our Principles

At ABP Food Group we expect strong social and environmental standards from suppliers and support those suppliers that need practical help and support in implementing more sustainable practices. Our challenge is to build supply chains that are resilient to the social and environmental challenges facing the industry, working closely with farmers, producers and processors to champion and embed excellence in sustainability. By 2020, our suppliers will be leaders in meeting or exceeding our social and environmental standards. The principles below set out our shared responsibilities with suppliers:

Commitment to ethical trade

Ethical trading is an important company objective. We are committed to providing sufficient resources to ensure our commitments are fulfilled. We recognise the need to communicate our commitment to key stakeholders including the public, suppliers and the people who work in our supply chains.

Fair terms of trading

We recognise the contribution that stable business relationships make to the observance of good labour practices and endeavour to establish long-term and productive relationships with our suppliers. We are committed to dealing openly and

fairly with suppliers, adhering to contract terms and avoiding the exertion of undue pressure.

Building the capacity of ourselves and others

We are aware that both colleagues and our suppliers' staff need to understand the importance of ethical trade and that they must be able to identify and resolve ethical issues. We are committed to providing guidance, training and support to suppliers where needed and to ensuring workers in our supply chain are aware of the provisions of the Base Code and our commitment to ethical trade. We view effective management systems as crucial for monitoring and tracking our own and suppliers' issues. We view it as essential that workers have knowledge of their rights and are able to report any issues confidentially and without detriment to a designated person/committee.

Monitoring our supply chains

We recognise the importance of being aware of labour practices in our supply chains and the need to monitor, evaluate and act on information about our suppliers', sites' and growers' performance. To do this, we use a range of tools including independent, third party audits of suppliers and sites, self-assessment questionnaires and confidential mechanisms for workers to highlight issues. We view worker and supplier communication as critical for identifying and resolving supply chain issues.

Being transparent

We aim to be transparent with all our stakeholders on our ethical trade performance and would encourage our suppliers to do likewise. We appreciate that you might be worried about sharing issues with us however it is better that we understand and work together to improve the situation. Together, we aim to respond rapidly and fully to ethical issues in our supply chains.

Striving for improvement

We recognise that many ethical trade issues can take time and effort to resolve. As a minimum, we require our suppliers to work towards compliance with our Code of Conduct or the local law – whichever provision affords the greater protection to workers. We expect suppliers to work to resolve issues identified in a timely manner and to engage workers' organisations in identifying and resolving issues. In the longer-term, we will work with suppliers and workers to develop best practice on ethical trade and positive examples which secure workers' rights alongside benefiting our suppliers' businesses and our own.

Code of Conduct

The provisions of this code constitute minimum and not maximum standards and this code should not be used to prevent suppliers, sites or growers from exceeding these standards. Companies applying this code are also expected to comply with national and other applicable law.

1. 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 identify papers with their employer and are free to leave their employer after reasonable notice.

2. 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 work place
- 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.

3. 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 environments
- 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 workers
- 3.5. The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. 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
- 4.3. Children and young persons under 18 shall not be employed at night or in hazardous conditions
- 4.4. These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

- 5.1. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards, In any event, wages should always be enough to meet the 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.

6. Working hours are not excessive

6.1. Working hours comply with national laws and benchmark industry standards, whichever affords greater protection

6.2. In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with all least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

7. 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.

8. Regular employment is provided

8.1. To every extent possible work performed must be on the basis of recognised employment relationships 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 and home-working 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.

9. 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 intimidations shall be prohibited.

10. Entitlement to Work

10.1. Only workers with a legal right to work in the country should be employed.

10.2. For both workers and agency workers, original documents should be reviewed and then returned to workers to verify right to work.

11. Labour agencies

11.1. Labour agencies should only supply workers registered with them

11.2. Relationships with labour agencies should be covered by a Service Level Agreement which meets all national legal requirements

11.3. Labour agencies should be audited on a regular basis to ensure compliance with national requirements.

12. Protection of the Environment

12.1. Suppliers, sites and growers shall carry out their activities in accordance with national laws, regulations, administrative practices and policies relating to the preservation of the environment of the countries in which they operate as well as in accordance with relevant international agreements, principles, objectives, responsibilities and standards with regard to the environment.

ABP Food Group Code of Conduct requirements are based on the ETI Base Code (www.ethicaltrade.org).

<i>[signature]</i>	<i>[signature]</i>
CEO FINBAR MCDONNELL or TOM KIRWAN DATE:	GENERAL MANAGER [INSERT NAME]