



Supplier Code of Conduct

Policy Applicable to: Suppliers of James T Blakeman & Co. Ltd

Policy Owner: The Ethical and Human Rights Team

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Introduction

James T. Blakeman & Co. Ltd & Services are a Family run business producing frozen, fresh and cooked sausage for the food service sector and have been trading for over 65 years.

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.

James T Blakeman & Co Ltd Supplier Code of Conduct Principles

These principles form part of the supplier selection process and are subject to continued monitoring. Where there is a pre-existing relationship with a supplier, the requirements of this code are in addition, and not in lieu of, any legal or contractual terms between that supplier and James T. Blakeman & Co. Ltd.

- Legal and regulatory compliance
- ETI Base code
- Modern Slavery
- SEDEX
- Payment of appropriate & legal wages

- Child labour & young persons
- Working hours are not excessive and unlawful
- Working conditions are safe and clean
- Discipline and grievances
- Employment is regular and freely chosen
- Forced labour
- Migrant labour
- No harsh or inhumane treatment
- Confidentiality
- Data privacy
- No bribery or corruption
- Environmental impact
- Quality and Specification
- Auditing
- Transparency and traceability
- Continuous improvement
- Security (Supply and IT)
- Media Contact

Legal and Regulatory Compliance

Suppliers will comply with all applicable local and national laws, rules, regulations and requirements in the provision of products and services manufactured and provided to James T. Blakeman & Co. Ltd. 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.

ETI Base Code

James T. Blakeman & Co. Ltd is committed to complying with the ETI Base Code. The supplier shall familiarise itself with this ETI Base Code and shall ensure in supplying James T. Blakeman & Co. Ltd it does not do anything or neglect to do anything that would

cause James T. Blakeman & Co. Ltd to breach its obligations under it.

Modern Slavery

James T. Blakeman & Co. Ltd is committed to ensuring it tackles modern slavery within its business operations and supply chain.

James T. Blakeman & Co. Ltd requires that its suppliers 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.

Where lawful to do so, the supplier shall inform James T. Blakeman & Co. Ltd 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.

SEDEX

We prefer although not required all raw material and packaging suppliers are to be SEDEX registered including each of the appropriate subsidiary sites or supplier sites that supply goods to James T. Blakeman & Co. Ltd.

We undertake a risk assessment of our supply chain to determine where we need to focus our due diligence.

In our first-tier supply chains our risk assessment comprises 3 elements.

- Members of the Food Network for Ethical Trade (FNET) can apply the FNET risk assessment methodology to the supply chain, which identifies high risk countries and products. This methodology provides you with prioritisation into high, medium, and low risk sites.

- It can focus on supply chains with inherent and/or historical risk.

- It can use the Supplier Ethical Data Exchange (SEDEX) data tool to identify areas of additional risk.

Payment of appropriate and legal wages

Staff, 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 are provided with 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.

Child labour and young persons

There shall be no recruitment of child labour. The supplier will comply with laws and regulations related to minimum working age in each jurisdiction in which it operates or does business.

A worker who is classified as a young worker will not be employed for duties which include night work, be expected to work in hazardous conditions or the use of chemicals

Working hours are not excessive or unlawful

Working hours are determined by local laws or standards whichever provides the greatest protection to the workers involved.

All workers shall not be expected to work over 48 hours per week on a regular basis and overtime, which shall be voluntary, kept below a threshold of 12 hours per week. The overtime is to be paid at a premium rate and not having a negative effect on any other accrual of benefits, e.g. holiday entitlement or pension.

Working conditions are safe and clean

A safe and hygienic working environment shall be provided in line with local laws and or the appropriate industry best practice standards.

The supplier shall have policies and procedures in place to identify risks and hazards within the workplace. The management and updating of these policies will be the responsibility of a named senior manager within your business. You will also provide appropriate training to mitigate or eliminate workplace risks as much as practically possible.

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

If accommodation is used to house workers these will be safe, clean, appropriate to the need 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.

Discipline and grievances

It is a James T. Blakeman & Co Ltd requirement that 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 must be transparent, set out clearly how grievances will be assessed, and feedback provided. Workers and their representatives must be

informed clearly how the scheme operates and its scope and that it is equally accessible to all workers.

The existence and scope of the grievance mechanism shall be communicated 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 he/she was accused of and given the right to trade union or other appropriate representation at disciplinary meetings which may lead to significant disciplinary penalties or dismissal.

Employment is regular and freely chosen

To every extent possible work performed shall be on the basis of recognised employment relationship established through national law and practice.

Where labour providers are used suppliers must 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.

Forced labour

There is no forced or compulsory labour in any 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.

James T. Blakeman & Co. Ltd expects suppliers to have a policy that explicitly bans discrimination/bullying and harassment based on sexual orientation, race, gender or gender identity/expression. In addition, suppliers are also encouraged to have evidence of diversity and inclusiveness training that is inclusive of sexual orientation and gender identity/expression.

The supplier will have policies and procedures in place to identify and then support workers who are affected by modern slavery.

Migrant labour

Where migrant labour is used James T. Blakeman & Co. Ltd expects its suppliers to have a clear understanding of the processes, fees and costs associated with this. This includes all the fees and costs incurred for migrant worker recruitment, origin, transit (where applicable), destination countries and any outstanding debts the worker may incur because of the process. Based on this understanding,

a time bound action plan should be developed to move to a responsible recruitment model in line with Employer Pays Principles and ILO definition on recruitment fees and costs and be incorporated within a recruitment policy.

A company or group migrant worker recruitment policy should stipulate clearly what fees and costs shall be borne by workers and the employer respectively as well as the main principles that shall guide the suppliers recruitment activities and their engagement with registered recruitment agencies, registered sub-agents, 3rd party recruiters or suppliers.

No Harsh or Inhumane treatment

All forms of mental, physical, or sexual intimidation are prohibited, and the company has procedure in place to identify and support workers affected.

Confidentiality

All information shared in the normal course of business is regarded as confidential and is not used in an illegal manner for either the company or individual's benefit.

No false information is to be given in the course of doing business.

Data privacy

The protection and responsible use of personal data is reflected in our daily operations with employees, customers and suppliers. We are committed to collecting and

using personal data in a lawful, fair, legitimate and ethical way.

When you are collecting and processing personal data, we expect you to comply with all applicable legislation in relation to data privacy. We expect you to 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.

No bribery or corruption

The offering directly or indirectly of payment, kickbacks, including facilitation payment, or other inducements to gain a commercial advantage is strictly prohibited.

Bribery can also take place where the offer or giving of a bribe is made by or through a third party, e.g. an agent, representative or intermediary.

The supplier will have in place anti-bribery and corruption policies that are designed to prevent any infringement of applicable law. You will review them regularly to ensure that they are operating effectively.

Environmental impact

We support and encourage business practices that are sustainable, and those that continually work towards improving efficiency and sustainability in line with their goals.

It is a prerequisite that you shall comply with all local and national environmental legislation and

have a process to assess the supply chain risk and impact of your sourcing strategy on the environment, a culture which delivers continuous improvement in mitigating any identified risks, highlighted from a robust evaluation process.

These goals should include, but not be limited to, water conservation (sustainable agriculture), reduction in carbon, deforestation, reduction in plastics and the ongoing reduction of chemicals.

As part of ongoing assessment James T. Blakeman & Co. Ltd will audit the supplier against the agreed programmes and as such the supplier will have a nominated representative for environmental improvements.

Quality and specification

All goods and services should be delivered in line with contractual agreement, without fault and of the agreed design, specification of use, quality, material, and workmanship.

Any services supplied should be provided by the appropriately qualified colleague in line with agreed expectations.

Auditing

Suppliers must be able to demonstrate compliance with this Supplier Code of Conduct. This includes documented evidence and the right for James T. Blakeman & Co. Ltd to audit the supplier. In the event that we become aware of any actions or conditions not in compliance with the Supplier Code of Conduct, we reserve the right to request corrective actions. James T. Blakeman & Co. Ltd reserves the right to terminate an agreement with any supplier that does not comply with the Code of Conduct.

Transparency and traceability

All raw materials and packaging supplied to James T. Blakeman & Co. Ltd will have an approved specification agreed with James T. Blakeman & Co. Ltd, prior to commencement of supply.

All raw material supplied will have an approved specification prior to supply.

Continuous improvement

The supplier will demonstrate and communicate a rolling programme of initiatives that are shared with James T. Blakeman & Co. Ltd across all agreed areas of the Supplier Code of Conduct.

Suppliers should seek to support and contribute to the social and economic wellbeing of the communities they work in.

Supply security

Suppliers will have good security practices across their supply chains. Suppliers will maintain processes and standards that are designed to assure the integrity of each shipment to James T. Blakeman & Co. Ltd from its origin through to its destination and all points in between.

Suppliers are expected to implement the necessary and appropriate measures in their area of responsibility to ensure that James T. Blakeman & Co. Ltd raw materials as well as the corresponding do not end up in the hands of counterfeiters or third parties and do not leave the legal supply chain.

IT security

Our network, drives and IT equipment are key to our business running smoothly and we do all that we can to keep them safe and secure in accordance with industry best practice. We expect all suppliers to maintain their IT network in the same way. From time to time we may ask you to complete a security assurance questionnaire.

Media contact

As a family owned company, no engagement with the media about James T. Blakeman & Co. Ltd or its activities should be undertaken unless agreed in advance. Any marketing materials, press releases, social media posts or media interviews, is formally approved by us prior to publication.

Policy governance

Version Number	Change	Policy Owner	Issue Date
001	Obligation to comply with sanctions	James T. Blakeman & Co. Ltd.	June 2022