



# FBC SUPPLIER CODE OF CONDUCT

## INTRODUCTION

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This Supplier Code of Conduct (“Code”) sets out the principles and standards which Fox’s Burton’s Companies (FBC) UK Limited (“FBC UK”) expects its suppliers, trade partners, commercial agents, distributors, vendors (collectively “Suppliers”) to respect and adhere to when conducting business dealings. The Code is applicable to all Suppliers of FBC UK and applies to all agreements, contracts, and purchase orders submitted by FBC UK.

Adherence by all our Suppliers to the requirements of this Code is imperative, and we appreciate our Suppliers’ partnership in helping us achieve these standards.

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### **1. APPLICATION AND SIGNIFICANCE**

This Code applies to all Suppliers, including their employees/collaborators/associates and sub-contractors, which are expected, as a minimum, to comply with applicable laws and regulations as well as to adhere to the higher standards of compliance stated herein to build a trust-based relationship of mutual success while nourishing the world in a safe, responsible and sustainable way.

Suppliers are expected to actively communicate the provision of this Code to

their own suppliers and subcontractors and to maintain and verify a process of continuous improvement towards sustainable practices in their entire supply chain, in a transparent and traceable manner.

This Code contains the minimum standards applicable to FBC UK Suppliers and refers to more detailed policies, which are available on request. Suppliers may also have individual contracts with FBC UK that contain specific provisions and/or agreements relating to these standards. The Code is not meant to supersede such provisions and/or agreements

and to the extent there is any inconsistency between this Code and/or agreements, the provisions of those agreements will take precedence.

This Code will be updated and reviewed on a regular basis to reflect learnings from the journey of continuous improvement.

The latest version of the Code is available on our website at [www.fbc-uk.com](http://www.fbc-uk.com)

## **2. ENGAGEMENT**

As FBC UK does not tolerate any practice that is inconsistent with the principles of honesty, integrity and fairness, it expects all Suppliers to conduct their own business with ethical standards consistent with the ones of FBC UK.

Suppliers must ensure the compliance with this Code, through the setup of adequate concrete actions, as well as internal policies, procedures, reports and training for their employees.

FBC UK may require evidence of the Suppliers due diligence and self- assessment as well as of those of its subcontractor's. A due diligence and self- assessment approach may include self-declaration exercises, online assessments, risk and impact assessments, data collection, internal or third-party audits, certifications, accreditations and/or documents demonstrating alignment with this Code and the International standards, which evidence can be provided at FBC' request.

At FBC UK's request, Suppliers will join Sedex and will provide FBC UK visibility to self-assessment questionnaires (SAQ's) and audit results and complete and update the SAQ on an annual basis.

All Suppliers are required to notify FBC UK of any actual or suspected legal infractions in terms of violations of humans' rights, environmental laws or anti- corruption or bribery laws and FBC UK reserves the right to request additional information from Suppliers with regards to the management of the relevant topic.

FBC UK reserves the right to not initiate, to suspend and/or terminate its relationship with a Supplier if such Supplier is refusing to consent to this Code or take corrective actions for ensuring the compliance with it.

## **3. CONTINUOUS IMPROVEMENT**

Where a Supplier is aligned with our Responsible Sourcing Pillars, it will also engage with us in a journey of continuous improvement. Any action plans and specific improvement measures will be developed with us in a collaborative way. The improvement measures and/or suggestions do not constitute legal advice and do not relieve Suppliers of their obligations to consult legal professionals. In addition, our improvement measures and suggestions do not preclude Suppliers from going beyond what is suggested.

## **4. OUR PILLARS**

This Code sets out our 4 Responsible Sourcing Pillars ("*Pillars*"), which provide the foundation of FBC UK's philosophy and of its operations globally.

### **PILLAR 1: BUSINESS IS CONDUCTED LAWFULLY AND WITH INTEGRITY**

FBC UK requires all Suppliers, cooperating with us, to comply with the following mandatory requirements.

✓ **Compliance with the laws**

Suppliers shall comply with all laws and regulations of the countries in which they operate, including the countries of sourcing, manufacturing and distribution. All other applicable international laws and regulation are complied with including those relating to international trade (such as those relating to sanctions, exports controls), competition laws and data protection.

✓ **Confidential and Competitors Information**

Suppliers must not divulge to FBC UK confidential information or information concerning FBC UK's competitors. FBC UK's confidential and proprietary information, including its logo and trademarks, may only be shared and used with the express written authorisation of FBC UK.

In respect to competition laws, Suppliers shall not engage in unlawful practices, including but not limited to, price fixing, market sharing and market splitting, agreeing to limit sales or output for the purpose of restricting or deterring fair competition and a free market.

✓ **Fair Trading**

At FBC UK, we define our ways of working as the Triple-Win model, aiming to benefit our three stakeholders: our consumers, our trade partners and our company. The Triple-Win model is based on three underlying principles:

1. The principle of fair trading means that all

participants throughout the supply chain will always behave in good faith and in accordance with the principles of mutuality and maximisation of value, avoiding unfair terms and conditions, business disruption, the transfer of excessive risks and unexpected costs to other participants in the supply chain and respecting each other's branding and intellectual property rights.

2. The principle of mutuality means that each trading partner should contribute to the business relationship, and both should have a real opportunity to benefit from it. Mutuality should be the basis for all dealings between trading partners.

3. The principle of maximisation of consumer value requires trading partners to work together to provide better value to the consumer. Together, all participants should seek to create an efficient supply chain and optimum use of resources.

✓ **Personal Data and privacy**

Suppliers shall protect the privacy and security of personal information of our employees, consumers, users, vendors, providers and customers in accordance with all applicable laws and following the principles of our Data Protection Policy. Suppliers need to comply with applicable laws and standards relating to personal data protection and to commit to the principle of free, prior and informed consent and support its implementation in our operations.

✓ **Bribery and Conflict of Interest**

All forms of bribery, corruption and extortion are prohibited and Suppliers shall ensure that they do not engage in bribery or other unlawful practices and ensure that this applies throughout its own supply chain. Suppliers must comply with FBC UK's Anti-Bribery & Corruption Policy and ensure that all hospitality and business entertainment are kept reasonable in nature, such that they are clearly not intended to influence FBC UK's decision making in any way.

Suppliers shall prevent any conflict of interests of which it is aware, in its dealing with FBC UK. Any ownership or interest in a Supplier's business by a government official, representative of a political party or an FBC worker needs to be declared to FBC UK prior to commencing any business relationship with FBC.

✓ **Safeguarding Assets**

All confidential information know-how, and intellectual property, which are not in the public domain and provided by FBC UK to Suppliers shall be used only for the intended purpose and shall be safeguarded and respected.

Any equipment, tools and materials provided by FBC UK to the Suppliers, for the performance of its contractual obligations shall remain the sole property of FBC UK. Suppliers shall handle them with care and diligence to ensure the appropriate use, storage and maintenance.

✓ **Financial Records, Money Laundering and Insider Trading**

All business and commercial dealings shall be transparently performed and accurately recorded in the Suppliers' books. Suppliers

must ensure that there is no actual or attempted participation in money laundering and no confidential information in the Supplier's possession shall be used to either engage in or support insider trading.

✓ **Excellent Product Quality and Safety and Responsible Innovation**

Quality is at the heart of everything we do at FBC UK. We are committed to achieving excellence in product safety and quality throughout the value chain, from the sourcing of ingredients to finished products, by adhering to our high internal standards that often exceed applicable food safety standards, laws and regulations.

When conducting business with FBC UK, our commercial partners must comply with Quality and Product Safety requirements established and communicated by us.

Research innovation must be conducted responsibly and based on good clinical practice and generally accepted scientific, technological and ethical principles.

**PILLAR 2: HUMAN RIGHTS AND SOCIAL RESPONSIBILITY**

Suppliers commit to respecting and promoting human rights and ensuring their organisations have processes in place to prevent breaches of human rights legislation. The approach of Suppliers must be guided by the **United Nations Guiding Principles on Business and Human Rights**, the **International Bill of Human Rights**, the **International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work** and the **OECD Guidelines for Multinational Enterprises**. If there is a conflict between these international standards and applicable

laws, Suppliers shall comply with the applicable laws, while seeking ways to honour these international standards.

✓ **Human Rights**

Suppliers shall comply and implement the FBC UK *Human Rights Policy Statement* [FBC UK Human Rights Statement 010424 v1.pdf](#) and apply the same principles FBC has committed to the key prioritised areas set out herein, including: **Child Protection and No Child Labour, No Forced Bonded and Compulsory Labour, Fair Wages, Working Hours, Diversity and Inclusion, No Discrimination and Harassment and Health and Safety.**

✓ **Workplace Environment**

At FBC UK, we are committed to keeping every employee safe and creating a fair and inclusive work environment. FBC UK requires external stakeholders to provide their employees with a safe and healthy working environment, including the development of appropriate controls and safety procedures, preventive maintenance policies and the use of protective equipment.

**PILLAR 3: ENVIRONMENTAL PROTECTION AND SUSTAINABILITY**

Suppliers commit that all operations, sourcing, manufacture, distribution of products and the supply of services are conducted with the aim of protecting and preserving the environment, on a local and global scale.

✓ **No Deforestation and no peat development**

FBC UK commits to cease all direct or indirect actions that cause deforestation by the end of 2025.

Suppliers shall take appropriate steps to ensure their actions do not have any negative impact on forests, peatlands and other protected territories of any depth. Additionally, Suppliers shall not expand into High Carbon Stock (HCS)<sup>1</sup> forests, High Conservation Value (HCV)<sup>2</sup> areas, or legally protected areas. When establishing new operations or expanding existing ones, Suppliers shall obtain all legal approvals and permissions. Suppliers shall keep documentary evidence of land use history and provide it, if requested.

✓ **Biodiversity**

Suppliers shall take appropriate steps to ensure throughout their operations and their entire supply chain, that biodiversity is preserved. When establishing new operations or expanding existing ones, Suppliers shall take appropriate steps to protect High Conservation Value areas and foster biodiversity. Suppliers shall keep documentary evidence of land use history and provide it, if requested.

**Air quality**

Supplier shall take appropriate steps to minimize air emissions and impact on air quality.

## **Carbon footprint and Carbon reduction targets**

FBC UK has climate reduction targets, validated by Science Based Targets initiative (SBTi). FBC UK commits to reach net-zero greenhouse gas emissions (GHG) across the value chain by full year 2050. These targets have been set in line with the SBTi Corporate Net Zero Standard and the SBTi Forest, Land and Agriculture Guidance (FLAG).

To support FBC UK's climate reduction targets suppliers shall put in place practices to assess their carbon footprint (scopes 1, 2 and 3) annually using GHG Protocol methodology and provide documentary evidence of its carbon footprint, if requested. Suppliers must, set near term carbon reduction targets aligned to The Paris Agreement (to limit global warming to 1.5°C above pre industrial levels) and develop and provide evidence of their CO<sub>2</sub> reduction pathway.

### **✓ Energy Efficiency**

Suppliers shall take appropriate steps to minimise the consumption of energy, as well as put in place energy saving strategies for example, the use of renewable sources and fuels, fuel-efficient logistics operations. Suppliers must provide their operational energy efficiency plan, on request.

### **✓ Water management and conservation**

Suppliers shall take appropriate steps to minimize their impact on water by reducing their water consumption, ensuring groundwater quality is maintained or improved, as far as possible and supporting water conservation. Suppliers shall take appropriate steps to provide documentary

evidence of their water footprint assessment, if requested.

### **✓ Chemicals management**

Suppliers shall not use chemicals considered harmful to the environment and/or to people. Suppliers sourcing agricultural commodities shall promote, a reduction in the use of chemicals and fertilizers across their supply chain and by their farmers. Suppliers shall put in place practices on chemical management across their supply chain. Suppliers shall provide documentary evidence of their chemical management and usage, if requested

### **✓ Soil quality**

Suppliers shall take appropriate steps to preserve soil quality and minimise their impact on soil, as far as possible. Suppliers sourcing agricultural commodities shall promote, good farming, and agricultural practices across their supply chain. Suppliers shall operate and promote composting and re-use of organic matter, and regenerative agriculture (i.e. practices which promote soil biodiversity and carbon storage). Supplier shall provide documentary evidence of their soil management and/or soil impact assessment, if requested.

### **✓ Waste Management**

Supplier shall take appropriate steps to minimise the production of waste and the consumption of natural resources. Supplier shall put in place practices on waste management, reducing their waste footprint and promoting circular economy.

### **✓ Animal welfare**

Suppliers shall take appropriate steps to ensure the protection of animals and the respect of animal welfare, seeking a constant

progressive improvement of the mental and physical needs of animals.

✓ **Sustainable packaging**

Suppliers shall take appropriate steps to minimise the environmental impact of packaging, removing unnecessary packaging, selecting recycled materials whenever possible and facilitating future packaging reuse or recycling.

Suppliers shall take appropriate steps to minimise the environmental impact of packaging. Supplier shall continuously apply the principles of Ecodesign: removing unnecessary packaging, selecting recycled materials whenever possible, reducing the amount of materials - particularly if coming from non-renewable sources - and facilitating future packaging reuse or recycling. Supplier shall adhere to applicable laws and the FBC UK Deforestation Free Policy [Deforestation Free Policy \(clean copy\) 18.12.25 0.pdf](#) Supplier shall provide FBC UK with product packaging data, on request

**PILLAR 4: SUPPLIER TRANSPARENCY**

Traceability and data management

Suppliers shall actively engage their supply chain in order to increase transparency and traceability therein. Suppliers shall trace where their commodities originate from, retain critical records and report and manage the information. Suppliers shall provide to FBC UK sample lots and traceability and geolocation records and information when requested.

**Management Systems**

Suppliers shall ensure the four key pillars are managed along their supply chain, by adopting a due diligence-based approach. Suppliers shall take appropriate steps to have management systems in place, including policies, objectives and procedures. Suppliers shall provide training to workers and/or employees, ensuring all pillars of this Code are understood and addressed consistently. Suppliers shall provide documentary evidence to demonstrate implementation of each of the pillars, on request.

**5. NOTIFYING CONCERNS**

Suppliers must deal with FBC UK in an open and cooperative way and disclose to FBC UK anything relating to this Supplier Code which FBC UK would reasonably expect to receive notice of in a timely manner and no later than 72 hours of the notifying event occurring.

Suppliers shall exercise good judgment, bearing in mind the severity and potential impact of the relevant concerns on the FBC UK's supply chain when determining whether it is notifiable. Suppliers shall notify any concerns through their reference point in FBC UK in the first instance.

If the regular reference point is not appropriate or is not available, Suppliers shall contact the SpeakEasyHelplineHelpline. The SpeakEasyHelpline is managed by a third party and is open 08:00-18:00 Monday to Friday, with an answerphone for out of hours. It can be accessed online and by phone.

All notifications are managed confidentially. In case remediation is required, FBC UK reserves the right to request the Supplier to take corrective action within a specified timescale and a firm commitment for implementation of any plans.

#### **4. THIRD PARTY DECLARATION**

Suppliers agree and commit to the principles stated in this Code, which are an essential prerequisite for supplying FBC UK and aims to ensure that we keep strengthening our partnership for a fair, sustainable and transparent supply chain.

The Supplier:

- agrees to carry out due diligence, which may include self-declaration or online assessments, risk and impact assessments, data collection, internal or third-party audits as well as providing certifications, accreditations or documents demonstrating alignment with this Code;
- agrees that FBC UK or an appointed third party may carry out announced/unannounced audits/inspections in accordance with any arrangements, agreements or contracts with FBC UK; and
- shall cascade this Code and conduct due-diligence throughout their supply chain on their employees, agents, subcontractors, suppliers and sub-suppliers to the extent they are involved in the provision of goods and/or services to FBC UK