



Ethical Trading & Human Rights Policy

Nov 2021

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Foreword

Robust ethical management is a fundamental of good business practices within the food industry. Growing legal, customer and societal expectations, reducing resources and increasing commodity costs are some of the challenges we face. In order to be a trusted supplier to retailers the Group must ensure it is effective in managing ethical impacts.

This Ethical Trading & Human Rights policy is intended to inform 2 Sisters Food Group (2SFG) sites of the minimum expectations placed on them for Ethical Trading and Human Rights based around the company's objective to comply with the ETI Base Code. The policy sets out a number of roles, which are not necessarily new or standalone duties, requiring decisions and actions from the site senior management.

The scope of this policy does not currently include 2SFG sites based in Holland or Poland but should they wish to implement the policy full support will be provided to help them to do so.

Summary

The policy is not best practice or optional, but is a requirement for all sites.

Responsibility for implementing this policy lies with the senior person on a site, such as the Site Director or General Manager. The HR Lead provides support in key requirements.

The site is required to implement management systems which ensure compliance with the requirements across all parts of the operation ensuring compliance with the ETI Base Code.

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Definitions

Wording	Definition
Divisional HR Leads	The senior HR person for a Division of 2 Sisters, which may be a HR Director, Head of HR or a Head of Learning and Development.
Young Worker	A person under 18 years of age.
Child	A child is anyone who has not yet reached the official minimum school leaving age (MSLA). Pupils will reach the MSLA in the school year in which they turn 16.
Child Labour	Work that harms, abuses and exploits a child or deprives a child of an education. It refers to working children below the age of completing compulsory education in the country of manufacture.

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1.0 Policy Statement

- 1.1 2 Sisters Food Group have adopted the Ethical Trading Initiative (ETI) Base Code to guide this policy and create the confidence that the business is doing all it can to ensure that colleagues have fair and decent treatment with their human rights respected.
- 1.2 Where any potential impact is identified in relation to human rights the Company will investigate the issue and implement appropriate action to prevent it from becoming an actual issue. In these matters the Group Sustainability Director will be notified and through consultation with the relevant HR Director and/or Head of HR will agree a corrective action plan to negate the issue.

2.0 Scope of Policy

- 2.1 This policy applies to all sites and offices within 2 Sisters Food Group and in particular to all staff that have a managerial or supervisory responsibility for staff and colleagues.
- 2.2 All our suppliers, agricultural partners and labour providers are required to work to this policy via the 2SFG Supplier Sustainability Code of Practice and are expected to be a member of SEDEX and linked to 2SFG.

3.0 Responsibility

- 3.1 Implementation of this policy is the responsibility of Site Directors or General Managers with control of the operations on a single site.
- 3.2 Divisional HR Leads are responsible for ensuring that the policy is clearly communicated to the colleagues' line management, local HR teams, trade union representatives and agency labour providers.
- 3.3 The Group Sustainability Director is responsible for supporting our production sites, suppliers and agricultural partners to comply with the policy.

4.0 Our Standards

4.1 Employment is Freely Chosen

We do not use and will not recruit child labour, in prison or bonded labour or forced labour of any description.

Employees are free to leave the company of their own accord at any time with the requisite contractual notice.

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4.2 Freedom of Association and Collective Bargaining

All workers have the right to Freedom of Association and to join a trade union or other worker body for the purpose of consultation, negotiation, collective bargaining and representation.

All workers will have access to raise concerns and get resolutions by either following the Company's Grievance Procedure, using employee representatives or by using 'Speak Up', the Company confidential multilingual reporting line.

4.3 Safe and Hygienic Conditions

All workers will have unrestricted access to decent standards of equipment and facilities whilst at work and their working conditions will be safe and hygienic.

Workers will receive regular and appropriate health and safety training, both as part of their induction program and on an on-going basis to meet the standards set by the Health & Safety Leadership Team.

4.4 Child Labour

We do not use and will not recruit child labour, in prison or bonded labour or forced labour of any description. Young workers will be supported in the business and we will be compliant with all national legislation in relation to their employment. Young persons under 18 years of age are not allowed to work at night or in hazardous conditions. We expect our supply chain partners to adopt the same standards.

4.5 Wages

We ensure equal access to jobs and equal pay for work of equal value. Pay for the standard contractual week at least meets the National Minimum Wage.

The company will not levy any charge on an employee whether financial or otherwise for employment with the company and will not retain employee's original documents.

Overtime that is worked in excess of the base contractual week will be paid at a premium rate and will not be less than 1.25 per hour for hourly paid colleagues.

All workers shall be provided with clear written information about their employment conditions in respect of wages before they join the business. All workers will receive written clear information about their wages for the pay period concerned each time that they are paid.

4.6 Working Hours

Working hours will not be excessive; the maximum working week will be 60 hours.

Overtime is voluntary and workers will not be required to regularly work in excess of 48 hours per week and will be provided with at least one day off for every 7 day period on average.

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4.7 Discrimination

We will ensure that our recruitment practices protect workers and give fair, consistent and equal treatment so that there is no discrimination in recruitment, pay or promotion decisions based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4.8 Regular Employment

We will promote permanent employment wherever possible and work with our customers so that we can adopt a planned approach to the use of agency workers.

4.9 Harsh or Inhumane Treatment

No harsh or inhumane treatment is allowed. Actual or threatened physical abuse or discipline, sexual or other harassment, or verbal abuse or any other form of intimidation or bullying are expressly prohibited and regarded as gross misconduct under the Company's Disciplinary Policy.

5.0 Policy Revisions

Version	Details	Date
1	Version 1 Original Policy issued	09.03.2014
2	Contents and Index page reformatted. Section 4 Our Standards - paragraphs re-numbered	08.04.2014
3	Policy Title changed, Section 1 Policy Statement amended to include Human Rights, Section 3. Responsibility amended to include Group Sustainability Manager, Section 4.2 amended, Section 4.4 amended, Section 4.6 amended	19.12.2014
4	Policy Statement amended	19.12.2014
5	Issued signed by Chief Executive Officer	23.02.2015
6	Review of all content and reformatting.	March 2016
7	Content review and update	02 11 2021

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