

COOPER FOODS ETHICAL TRADING POLICY

Introduction

We recognise the responsibility that we share with our suppliers to source products in an ethical manner. We want our customers to be confident that the people who produce our products are treated fairly and are not exploited or exposed to unsafe working conditions.

Our Ethical Trading Policy is a core element of our commitment to buy and sell our products responsibly. We ask all of our suppliers to sign up to our Ethical Aims, which are based on the ETI Base Code.

We have included our Code of Conduct below so you can see the commitment and importance we place on ethics in all our supplier relationships.

1. Employment is freely chosen
 - a. There is no forced, bonded or involuntary prison labour
 - b. Workers are not required to lodge monetary deposits or their identity paper with their employer and are free to leave their employment after reasonable notice.
2. Freedom of association and the right to collective bargaining are respected.
 - a. Workers have the right to join or form trade unions of their own choosing and to bargain collectively.
 - b. The employer adopts an open attitude towards the activities of the trade unions and their organisational activities.
 - c. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
 - d. 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
 - a. 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.

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- b. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or re-assigned workers.
- c. Workers are provided with access to clean toilet facilities and potable water and, if appropriate, sanitary facilities for food storage shall be provided.
- d. Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers.
- e. A senior management representative shall be responsible for Health and Safety.

4. Child labour is not used

- a. There shall be no use of child labour
- b. 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.
- c. Children and young person under 18 shall not be employed at night or in hazardous conditions.
- d. These policies and procedure shall conform to the provision of the relevant ILO standards.

5. Living wages are paid

- a. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- b. All workers should 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.
- c. 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

- a. Working hours must comply with national laws, collective agreement and the provisions of 6.b to 6.f below, whichever affords the greater protection for workers. Sub-clauses 6.b to 6.f are based on international labour standards.
- b. Working hours, excluding overtime, shall be defined by contract and shall not exceed 48 hours per week
- c. All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment.

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- d. The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.e below
- e. Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:
 - i. This is allowed by national law
 - ii. This is allowed by a collective agreement freely negotiated with workers organisation representing a significant portion of the workforce
 - iii. Appropriate safeguards are taken to protect the workers health and safety and the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- f. Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

7. No discrimination is practised

- a. 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

- a. To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- b. 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 or home-working arrangements, or through apprenticeships 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

- a. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

10. The provision of this code constitutes minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of the law and this Base Code address the same subject, to apply that provision which affords the greater protection.

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ETI Base Code



The ETI Base Code is an internationally recognised set of labour standards based on ILO conventions. It is used by ETI members and others to drive improvements in working conditions around the world.

www.ethicaltrade.org



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Declaration

Cooper Foods (Andover) Ltd is committed to working with companies who agree with and follow the ETI Base Code.

Please sign below to confirm that:

1. You are duly authorised to sign this acknowledgment form on behalf of your Company;
2. You have read and understood, and agree that your Company will comply with the legal and ethical requirements set out our Ethical Trading Policy;
3. Your company has not committed any breach of the legal and ethical requirements set out in our Ethical Trading Policy and, to the best of your knowledge, there is no modern slavery taking place within your business or supply chains;
4. Cooper Foods (Andover) Ltd representatives may, within reason, be given access to the Company facilities, employees and records as necessary to determine compliance with the requirements of the Ethical Trading Policy; and
5. On request, you will provide Cooper Foods (Andover) Ltd with evidence to demonstrate compliance with our Ethical Trading Policy. If you are unable to demonstrate compliance to our reasonable satisfaction, we will work with you to achieve compliance.
6. Cooper Foods (Andover) Ltd may terminate any and all agreements in place with your Company with immediate effect in the event that the Company fails to comply with any of the requirements in our Ethical Trading Policy.

Signature:	
Name / Position :	
Company Name :	
Date :	

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