



## **SUPPLIER SUSTAINABILITY CODE OF PRACTICE**

**August 2023**

**Document uncontrolled if printed**

The information contained in this document is the property of the Company. The contents of this document cannot be reproduced or disclosed wholly or in part or used for the purposes other than that which it is supplied without prior written permission of the Company.



## Supplier Sustainability Code of Practice

### Contents

	Page No.
• List of Contents .....	2
• Foreword.....	3
• Summary.....	4
• Definitions .....	5
• Scope of the Code of Practice for Suppliers.....	6
• Supplier Food Safety requirements	
• Supplier Ethical Trade Requirements.....	6
• Modern Slavery .....	7
• Supply Chain Environmental Sustainability Requirements.....	8
• Appendix 1: 2SFG Ethical Trading Policy .....	10
• Appendix 2: Joining SEDEX and linking to 2SFG .....	12
• Links.....	17

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 2 of 17



## Supplier Sustainability Code of Practice

### Foreword

Customers and society have an expectation that standards in their food supply chain should be based on sound and ethically secure principles that ensure the sustainability of all parts of the supply chain.

2SFG sets standards on food safety, ethical behaviour and environmental management for its own operations that include independent audits, membership of SEDEX and assurance processes such as RSPO. We continuously seek to improve the way that we work to ensure the sustainability of the organisation.

2SFG and its suppliers should be aware of and comply with legislation as it develops. This Code of Practice includes compliance with the Modern Slavery Act which requires 2SFG to report its actions in this area publicly.

Our expectation is that 2SFG's sustainability standards will also be applied to our suppliers for production, cultivation, processing and handling of materials used in 2SFG products and their packaging, and to 2SFG contracted suppliers. This Code of Practice sets out the minimum standards mandatory for suppliers to the company.

2 Sisters Food Group (2SFG) recognises and respects the human rights of all those involved in our supply chain. We expect our suppliers to protect the rights of their workers and promote good working practices for all those involved in the supply chain.

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 3 of 17



## Supplier Sustainability Code of Practice

### Summary

2 Sisters Food Group requires that its direct suppliers operate to high standards of food safety, ethical behaviour and environmental sustainability, and that they in turn require the same of their suppliers.

Food safety is an absolute obligation and we therefore require suppliers to be GFSI accredited for categories where a scheme exists. This includes ingredients, storage, storage & distribution, and packaging.

Suppliers are also required to adhere to 2SFG's Ethical Trading policy, to be registered on the SEDEX platform and have completed the SEDEX self-assessment questionnaire. New suppliers to 2SFG must register on SEDEX before or during the supplier approval process.

Suppliers must be aware of the Modern Slavery Act and take account of it in their own plans and assist 2SFG in complying with the Act.

Suppliers must also be aware of the environmental impacts of their operations and those of their supply chain and where these are significant, must take action to reduce them. These steps may involve using materials assured to certain standards such as Palm Oil compliant with the RSPO standard, sourcing in such a way that impacts are reduced or finding alternative, non-impact materials in co-operation with 2SFG.

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 4 of 17



## Supplier Sustainability Code of Practice

### Definitions

Wording	Definition
2SFG	2 Sisters Food Group
ASC	Aquaculture Stewardship Council
Contracted Service Providers	Contractors who provide service and staff such as canteens, security, logistics and office cleaning
CoP	This Code of Practice
ETI	Ethical Trading Initiative
ETI Base Code	Ethical standard drawn up by ETI members and applicable to manufacturers and farmers in the UK retail supply chain
GFSI	Global Food Safety Initiative. Standards include BRC Global Standards on Food Safety, FSSC 22000, SQF etc
GLAA	Gangmasters & Labour Abuse Authority
GLAA Standard	The licensing standard drawn up by the GLAA and applicable to all suppliers of temporary labour to UK food processors and farmers.
Labour Providers	Supply labour to production facilities.
MSC	Marine Stewardship Council
Modern Slavery	The term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking.
RSPO	Roundtable on Sustainable Palm Oil
SEDEX	Supplier Ethical Data Exchange. A platform that enables buyers, suppliers and auditors to store, share and report on information related to ethical compliance.
SEDEX SAQ	SEDEX based Self-Assessment Questionnaire (The SAQ in this CoP) which all 2SFG suppliers must complete.
SMETA	Ethical audit standard managed by SEDEX and available through the SEDEX system
Stronger Together	Joint initiative involving retailers, GLAA, suppliers and charities which aims to assist labour providers and users to detect and prevent slavery and exploitation in their work force.
Tier 1 Suppliers	Suppliers that supply goods and services directly into 2SFG suppliers.
Tier 2 Suppliers	Suppliers of goods and services directly into 2SFG Tier 1 suppliers.
Workers (Employees, Staff)	Describes all the people working for the business, both permanent and temporary.

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 5 of 17



## **Supplier Sustainability Code of Practice**

### **1.0 Scope of the Code of Practice for Suppliers**

- 1.1 This Code of Practice applies to all suppliers, agents of suppliers, agricultural suppliers, labour providers and contracted services providers within the 2SFG supply chain.

### **2.0 Supplier Food safety requirements**

- 2.1 All suppliers to be GFSI accredited where a scheme exists. This includes Storage, Storage & Distribution and Packaging.

### **3.0 Supplier Ethical Trade requirements**

- 3.1 2SFG recognises and respects the human rights of all those involved in our supply chain. We require our suppliers to protect the rights of their workers and promote good working practices for all those involved in the supply chain.
- 2.2 It is 2SFG's requirement that suppliers adhere to our Ethical Trading Policy set out in Appendix 1. 2SFG strongly recommend that suppliers have developed and implemented an effective, easily accessible, reporting process to allow all individuals working within the business sites to whistleblow, make complaints and report violations of the Ethical Trade Policy confidentially to a qualified, independent, impartial third-party entity.
- 2.3 Additionally, suppliers are required to join SEDEX either as an A/B or B member. Agents and brokers are required to join SEDEX as A/B members and ensure that all sites supplying 2SFG are registered on SEDEX as B members as a minimum. Alternative ethical trading management systems will be considered. All suppliers must complete the SEDEX Self-Assessment Questionnaire, which will allow 2SFG to conduct a risk assessment. The SAQ should be updated every 12 months as a

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 6 of 17



## Supplier Sustainability Code of Practice

minimum or more frequently if major changes have occurred. Contact details on SEDEX should be kept up to date.

- 2.4 Suppliers must link their sites (not Head Offices) to 2SFG on SEDEX and ensure that their SAQ, site details and audits are visible to 2SFG. See Appendix 2 for details of joining and linking on SEDEX.
- 2.5 Suppliers that are graded high risk using the SEDEX risk assessment process will be expected to commission an independent ethical audit by a SEDEX approved auditor and to close any non-conformances raised within recommended times. Critical non-conformances raised during an ethical audit should be communicated to 2SFG with a corrective action plan.
- 2.6 Direct suppliers to 2SFG should ensure that their suppliers (Tier 2) also join SEDEX, complete the self-assessment section and link to the Tier 1 suppliers as DIRECTS and link to 2SFG as INDIRECTS.
- 2.7 2SFG will work with suppliers to implement these requirements and provide support on implementation and addressing corrective action. However, where suppliers continue to demonstrate breaches, the company will remove them from the approved supplier list.

## 3.0 Modern Slavery

- 3.1 2SFG complies with the requirements of the Modern Slavery Act and publishes an annual Modern Slavery Act Statement. This includes the steps 2SFG is taking to combat slavery and exploitation in its supply chains. Implementation of this Code of Practice by suppliers is a vital step in combating exploitation and will form part of 2SFG's public disclosure.

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 7 of 17



## Supplier Sustainability Code of Practice

- 3.2 Suppliers to 2SFG must comply with the ETI base code, national law as it applies to permanent and temporary workers, and the GLAA Standard where applicable in the UK, or any national equivalents.
- 3.3 2SFG supports the use of tools and information provided by Stronger Together (<http://stronger2gether.org>) to help prevent and tackle modern slavery
- 3.4 The provisions of this Code of Practice constitute minimum standards and should not be used to prevent suppliers, sites or growers from exceeding these requirements. Companies applying this code are also expected to comply with national and other applicable laws.

## 4 Supply Chain Environmental Sustainability Requirements

- 4.1 2SFG understands the risk to the sustainability of the food supply chain of unmanaged exploitation of the environment, use of scarce resources such as oil, gas, water, land and fisheries or uncontrolled release of polluting materials.
- 4.2 It is 2SFG aim that its supply chain partners are aware of current sustainability concerns and the standards set by the company and its customers for managing sustainability risks.
- 4.3 Suppliers must comply with all relevant environmental legislation.
- 4.4 Suppliers should have an environmental policy defining their approach to environmental management and setting out their commitment to
  - Adherence to customer requirements
  - Regulatory compliance
  - Pollution prevention
  - Continual improvement in environmental performance

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 8 of 17



## Supplier Sustainability Code of Practice

At a minimum, the scope of the policy should include: waste, water, pollution, energy, greenhouse gas emissions, raw materials, packaging and local communities.

- 4.5 Through its own risk assessment process 2SFG may identify raw materials where a supply chain wide approach to improving sustainability is required. In these cases, a strategy for the management of the identified risk(s) will be put in place and suppliers will be expected to comply with the requirements of these plans. We currently have the following raw material requirements:

Palm oil: Where raw materials supplied contain palm oil or its derivatives, these should be RSPO (Segregated) Supply Chain Certified.

Wild caught fish and seafood: Wild fish should be certified to MSC or equivalent standard.

Farmed fish and seafood: Farmed fish and seafood should be certified to ASC or equivalent standard.

Soy/embedded soy: 2SFG is a member of the UK Soy Manifesto and working towards deforestation and conversion free soy supply chains by 2025. We expect all suppliers to support this aim and ensure any raw materials containing soy or embedded soy comply with the UK Soy Manifesto goal by 2025 <https://www.uksoymanifesto.uk/>

- 4.6 Where significant, suppliers should inform 2SFG of what sustainability impacts affect their operations, or those of their suppliers such as the potential for water shortages in the light of climate change.

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 9 of 17



## Supplier Sustainability Code of Practice

### APPENDIX 1: 2SFG ETHICAL TRADING POLICY

#### 1. Employment is Freely Chosen

We do not use and will not recruit child labour, 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.

#### 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 a confidential multilingual reporting line.

#### 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. Child Labour

We do not use and will not recruit child labour, 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.

#### 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.

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 10 of 17



## Supplier Sustainability Code of Practice

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 to 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.

### 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.

### 7. Discrimination

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.

### 8. Regular Employment

Promote permanent employment wherever possible and work with customers to adopt a planned approach to the use of agency workers.

### 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.

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 11 of 17

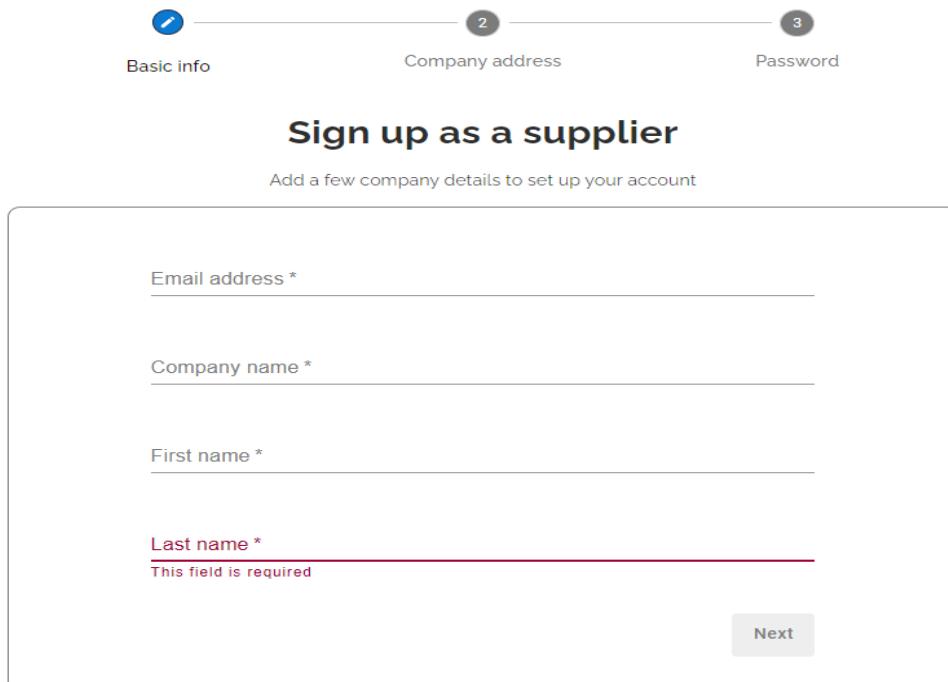


## Supplier Sustainability Code of Practice

### APPENDIX 2: Joining SEDEX and Linking to 2SFG. Company Reference ZC1020280

#### Joining SEDEX

Please go to <https://www.sedex.com/join-sedex/supplier/> to register as a supplier on SEDEX.



The form consists of three steps: 1. Basic info, 2. Company address, and 3. Password. Step 1 is active, showing fields for Email address\*, Company name\*, First name\*, and Last name\*. A note says 'This field is required'. Step 2 shows a 'Next' button. Step 3 is shown as a dashed outline.

**Sign up as a supplier**  
Add a few company details to set up your account

Email address \*

Company name \*

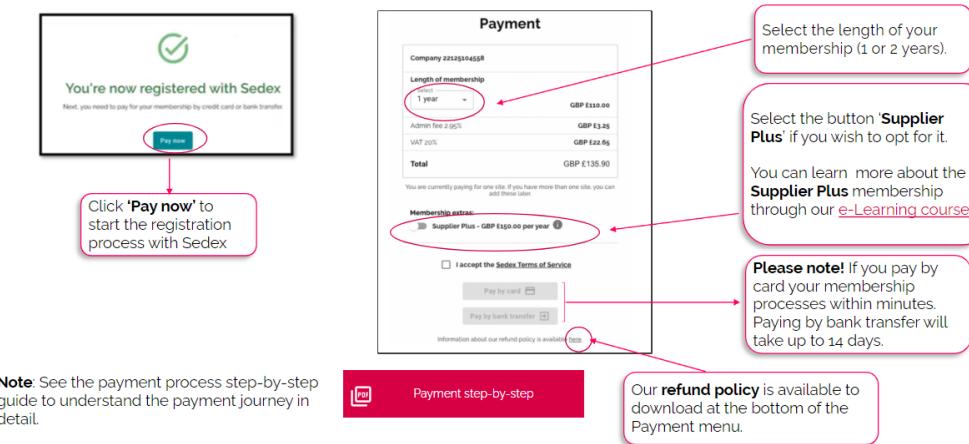
First name \*

Last name \*  
This field is required

Next

#### Pay for your membership

Once you have set up your Sedex username and password, you will need to pay for your membership.



The guide shows two screenshots: a confirmation page and a payment page. Annotations explain the steps:

- Click 'Pay now' to start the registration process with Sedex.
- Select the length of your membership (1 or 2 years).
- Select the button 'Supplier Plus' if you wish to opt for it. A note says: You can learn more about the Supplier Plus membership through our e-Learning course.
- Please note! If you pay by card your membership processes within minutes. Paying by bank transfer will take up to 14 days.
- Our refund policy is available to download at the bottom of the Payment menu.

**Note:** See the payment process step-by-step guide to understand the payment journey in detail.

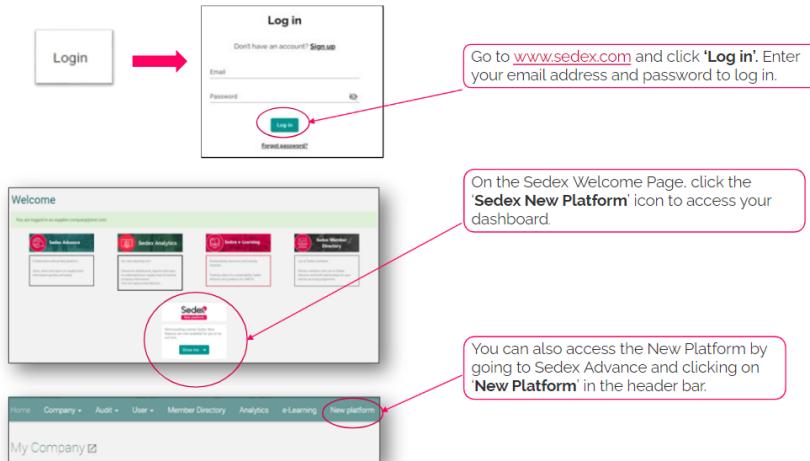
Payment step-by-step

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 12 of 17

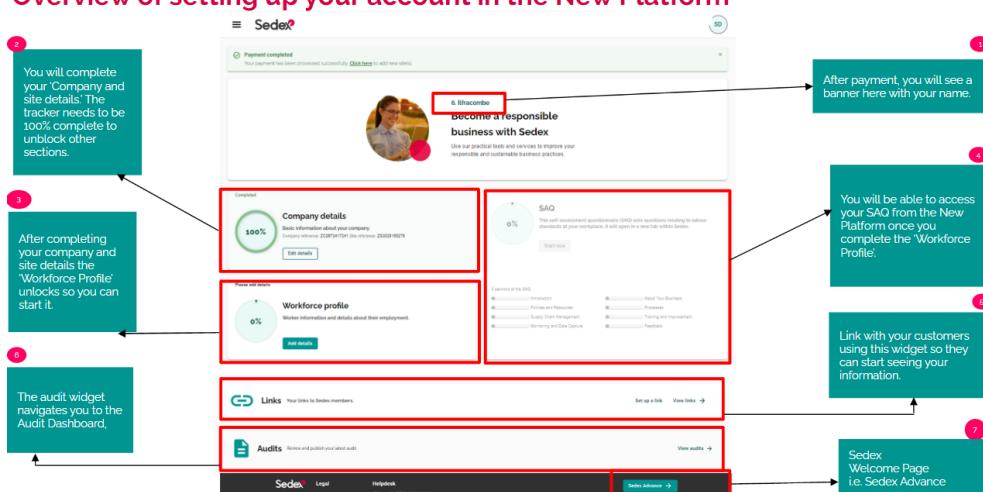
## Supplier Sustainability Code of Practice

### Logging in to your Sedex Account

Once you have set up your Sedex username and password and paid for your membership you may log out. To log back in again follow these steps.



### Overview of setting up your account in the New Platform



### Company and site details

The company and site details consist of three major sections in which you need to provide the following information:



#### Company Information

- Company name
- Address
- Contact number
- Email
- ZC code/number

#### Site Profile

- Site name
- Site address
- Number of workers at the site
- Primary site activity
- Business type
- Business License Number & Expiration
- Labour provider details

#### Worker Information

- Number of workers
- Worker wages
- Worker gender ratios
- Onsite or offsite worker details
- Type of workers

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 13 of 17



## Supplier Sustainability Code of Practice

### ZC, ZS, ZU Codes

You will notice on your dashboard and in the Company Details section that you have a reference number for your company and site. Z codes are unique identifier numbers used throughout the Sedex platform.

There are three main codes:



**ZC Code**

- In ZC code the letter 'C' stands for company
- It is a unique reference number allotted to every company who joins Sedex
- ZC code helps locate a company within the Sedex system



**ZS Code**

- In ZS code the letter 'S' stands for site
- It is a unique reference number allotted to every site by Sedex
- If you have multiple sites, the ZS code can be used to locate/identify specific sites



**ZU Code**

- In ZU code the letter 'U' stands for user
- It is a unique reference number allotted to every user by Sedex
- ZU code helps to locate a user within the Sedex system

### Linking to your customer



As a member you can request to link to another member as their customer or supplier.  
As **their supplier**, you are requesting to share information to them.

Sedex

Payment completed  
Your payment has been processed successfully. [Click here](#) to add new sites.

Company overview - Supplier B ZC672417241

Site name	ZS Number	Self Assessment Questionnaire (SAQ)	Audit	Membership status
1. Sedex Global	ZS642227499	Last updated: 30th of Aug 100%	30 Nov 2022	Renewal date: 03/03/25
2. Sedex Global	ZS642227494	Last updated: 30th of Mar 100%	None	Renewal date: 03/03/25
3. Sedex Global	ZS642227493	Last updated: 30th of Apr 9%	28 Aug 2022	Renewal date: 03/03/25
4. Sedex Global	ZS642227492	Last updated: 18th of Dec 10%	30 Nov 2022	Renewal date: 03/03/25
5. Sedex Global	ZS642227491	Last updated: 18th of Aug 0%	24 Dec 2022	Renewal date: 03/03/25

Links Your links to Sedex members.

Set up a link View links →

Once you are in your Company /Site Overview dashboard, you will see the 'Links' widget at the bottom of the page.

Click on 'Set up a link'.

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 14 of 17



## Supplier Sustainability Code of Practice

### Linking to your customer



1 Company name      2 Company type      3 Link type      4 Select sites

Who would you like to link to?  
Links allow suppliers to share contact details, Self-Assessment Questionnaires (SAQs), and audits with their customers.

From: Supplier B  
To:

Back Next →

Select the company and click 'Next'.

In the top field, you will be asked if you are creating a link on behalf of your own company or subsidiary company.

If you have a subsidiary organization, you could use drop-down menu to select the subsidiary.

Use this field to set the target company. You could search by company name, site name, ZC or ZS number.

### Linking to your customer



1 Company name      2 Company type      3 Link type      4 Select sites

Is **s 39** a customer or supplier?  
Customer or Supplier

Back Next →

Does **s 39** supply **BuyerA Demo** directly?  
Select NO if they supply through another company or site  
Yes or No

Back Next →

You will be asked if the target company is a Customer or a Supplier. In this case, the company is a Customer.

You are asked to select if you supply the target company directly or indirectly.

Click 'Yes' if you supply the target company directly.

Click 'No' if you supply through another site or company. (i.e. there's another company in the supply chain between you and the target company.)

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 15 of 17



## Supplier Sustainability Code of Practice

### Linking to your customer



Company name      Company type      Link type      Select sites

Add a reference (optional)  
Add your own reference to quickly identify a customer or supplier in your reports.

Reference

[← Back](#) [Next →](#)

If you would like to assign a reference, you could do so here. The reference would be seen by both companies in the link. You can also edit it once the link has been accepted.

Company name      Company type      Link type      Select sites

Select sites to link to Site 1

Sites	<input checked="" type="checkbox"/> Deselect all	
Name	Z number	Address
<input checked="" type="checkbox"/> Scarsdale	Z52672657524	7279 Roberts Street, Asheville, NC, USA N/A, Asheville, 28801, US
<input checked="" type="checkbox"/> Smyrna	Z5282436591	13 River Street, West Springfield, MA, USA N/A, West Springfield, 01089, US
<input checked="" type="checkbox"/> Koll	Z52851018224	Lewinowska, Warsaw, Poland N/A, Warszawa, 03, PL

Default select all sites for you when setting up a link request. You can de-select the sites or untick specific sites.

### Linking to your customer



Company name      Company type      Link type      Select sites

You're linking these sites to S 39

Sites		
Name	Z number	Address
Wal-Mart	Z52672622375	84 South Dr, Miami Springs, FL, USA N/A, Miami Springs, 33166, US
Marquette	Z52824500658	38 Winchester Street, Brookline, MA, USA N/A, Brookline, 02446, US
Delhi	Z53233299740	Delhi Road, Vikas Colony, Budhni Vihar, Moradabad, Uttar Pradesh, India N/A, Moradabad, 234134, IN

[← Back](#)

[Request link](#)

- Click 'Request link'.
- An **email request** would be sent to the target customer company. From the email, the customer will be able to **review** the details of the link and **accept the request**.

- When your customer accepts the link, you will receive an email notification.

- Once a link request has been accepted, the customer will be able to see **your sites, membership, SAQ and Audit information in the linking area, Site Status, Analytics and Radar**.

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 16 of 17



## Supplier Sustainability Code of Practice

### LINKS

ASC <https://asc-aqua.org/>

ETI <http://www.ethicaltrade.org>

GLAA <http://gla.gov.uk>

MSC <https://www.msc.org/uK>

RSPO <http://www.rspo.org>

SEDEX <http://www.sedexglobal.com>

STRONGER TOGETHER <http://stronger2gether.org>

UK Soy Manifesto <https://www.uksoymanifesto.uk/>

Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENV003	8.0	Group Sustainability Director	August 2023	Page 17 of 17