FOODSPEED
DAIRY AND FINE FOODS

Ethical Trading Policy Statement

At Foodspeed, we believe strongly in ethical trading and strong stewardship. As a company, we recognise that our commercial activities have a potential to impact on our suppliers and members of the local community.

Foodspeed is committed to ensuring that all of our dealings with suppliers, from the point of search and selection, through to supply and payment, are conducted in accordance with the guiding principles of responsible and ethical trading. We will act broadly in line with, but no less than, the Base Code of the Ethical Trading Initiative.

The key elements of the Base Code are:

- Free choice of employment
- Respect freedom of association and the right to collective bargaining
- Safe & hygienic working conditions
- No child labour
- Pay living wages
- Reasonable working hours
- No discrimination
- Provision of regular employment
- No harsh or inhumane treatment

Our ethical good practice is promoted by positive selection of suppliers demonstrating the good practice noted above, and by the encouragement of best practice amongst all suppliers. We will expect our suppliers to adopt a similar position with their supply base and to implement similar internal policies to those of Foodspeed Ltd.

1. Employees

Foodspeed Ltd is committed to ensuring the protection of the rights of all those who work for the Company, through well established and widely available personnel policies. In many areas the company aims to operate above the minimum standards required by law to ensure that employees are safe, rewarded and valued.

2. Consumers

Foodspeed Ltd is committed to demonstrating its ethical and social responsibility credentials to enable Clients to make informed choices about products they purchase. To support this commitment, further detailed information is provided in the company's brochure and website.

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3. Suppliers

Foodspeed Ltd is committed to monitoring social standards in the supply chain, and the company encourages suppliers to operate to the same ethical standards employed by Foodspeed itself. The ethical trading practices of direct suppliers are initially monitored by self-assessment questionnaires, followed by Ethical Trading assessments of key suppliers as part of the Foodspeed Ltd Supplier Assurance Procedure.

4. Foodspeed Ethical Trading Code of Practice

a) This Code of Practice applies to staff directly employed by Foodspeed on temporary or permanent contracts:

- No forced, bonded or involuntary labour shall be used.
- All employment with Foodspeed Ltd is freely chosen.
- Staff are not required to lodge deposits or identity papers with us.
- Staff are free to leave Foodspeed Ltd after reasonable notice.
- No child labour shall be used.
- There shall be no recruitment of child labour.
- Young persons under the age of 18 are not employed at night or required to undertake hazardous activities.

b) All employees have the right to join a recognised trade union and to bargain collectively.

c) Working conditions are safe and hygienic

- Foodspeed Ltd takes adequate measures to prevent accidents and minimise potential hazards.
- Staff receive regular health and safety training.
- Staff have unrestricted access to toilet facilities and drinking water.
- Foodspeed Ltd has published a Health & Safety Policy and staff handbook, which details responsibility.

d) Working hours and remuneration are reasonable and comparable to other companies within the dairy industry, and regular employment is provided.

- Staff pay rates comply with national legal standards as a minimum.
- Staff are not forced to work in excess of 48 hours per week on a regular basis, and are provided with at least 1 day off per week. All overtime is voluntary.
- Staff are given written terms and conditions of employment that details the employment relationship between and the respective obligations of the employee and employer, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence & sick pay rules and notice periods for termination of employment.

- No deductions are made from wages as a disciplinary measure, and pay slips detailing lawful deductions (tax, national insurance) and voluntary deductions (pension, save-as-you-earn, charity donations, social club) are provided for each pay period.
- Sub-contracting and fixed term contracts are not used as a means to avoid obligations under labour or social security laws
- No discrimination is practised.
- There is no discrimination in pay, hiring, compensation, access to training, promotion, termination of employment or retirement on the grounds of race, nationality, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Opportunities for personal and career development are equally available to all employees.
- No harassment, threats, abuse or intimidation shall be practiced.
- Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited.

5. Organisation & Responsibilities

Foodspeed Ltd Management have overall responsibility for ethical trading at work within their respective businesses and areas of control.

The **Managing Director** take a lead in planning, developing, reviewing and communicating ethical trading policy and standards and ensuring improvement action is taken where necessary. The Quality Services Manager is responsible for monitoring compliance and for providing advice.

Managers are responsible for the implementation of this policy by:

- Ensuring that internal assessments have been carried out for all potential ethical trading issues, with appropriate procedures, controls, reviews, and adequate records.
- Identifying and investigating any incidents or non-conformances and taking corrective action.
- Monitoring and recording the performance of the site against this policy.
- Communicating necessary instructions and information to employees, visitors and contractors.
- Completing actions following any ethical trading audits.

Line Managers are responsible for:

- Promoting ethical working practices and following appropriate procedures.
- Investigating and reporting any incidents or non-conformances against this policy.

The **Site Ethical Trading Coordinator** has the role of:

- Identifying and advising upon non-conformances against this policy, and the provision and use of appropriate systems and procedures.
- Informing management of the requirements of this Code and how it affects them and their responsibilities.

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Each **Employee** also has a duty to co-operate with management so far as is necessary to enable the latter to fulfil their statutory obligations. This includes:

- Co-operating in the introduction and operation of all measures designed to fulfil management's obligations under this policy.
- Drawing attention to actual or potential problems.
- Suggesting ways in which ethical trading practices could be improved.

Business Conduct with Suppliers

- We adopt the highest standard of integrity in all our business dealings and relationships. We understand and comply with our corporate responsibility and reject any business practice that might reasonably be deemed improper.
- We will avoid any personal business or professional activity that could create a conflict between personal interests and the interest of our company
- We promote positive supplier relationships through honesty and impartiality
- Where commercially viable we support the sourcing of goods and materials from sources that are deemed to be environmentally friendly
- We will conduct supply management in accordance with best practice
- We respect complete confidentiality and expect this to be mutually binding
- Personal relationships must not compromise purchasing best practice
- We support the payment of goods and services in accordance with the agreed terms

Signed:	**Name& Position:**
M. S. Bawa	M Bawa, Managing Director, Foodspeed