


<b>O'Brien Fine Foods - Quality Manual</b> Date Of Issue - 01.08.2024 Page 1 Of 6 Rev 2 Issued By Nick Reynolds	
Subject: Supplier Code of Conduct	Approved By: Nick Reynolds

## O'Brien Fine Foods Supplier Code of Conduct

This Code of Conduct sets out the minimum standards we expect our suppliers to adhere to when conducting business with O'Brien Fine Foods. As a Company we are committed to managing our business in accordance with our values. Through this policy, we want to build meaningful relationships with Suppliers who share our vision and values and who strive to conduct business in compliance with widely recognised international ethical standards. This Supplier Code applies to suppliers, vendors, contractors, consultants, agents and other providers of goods and services with whom the Company does or seeks to do, business with.

### **Employment and Human Rights**

All Suppliers shall have fair employment practices in place to ensure all employees are treated fairly and with respect. These practises must comply with all applicable local employment laws and must ensure employees are supported, valued and rewarded fairly. Suppliers shall also comply with the Ethical Trading Initiative (ETI) Base Code and must be able to demonstrate ethical human rights practises in operation.

### **Equality and Diversity**

Suppliers shall ensure they provide and promote a workplace that is free of discrimination. Employees must be chosen based on their ability to do the required job and that no preference or exclusion should be made on any other grounds. There is no discrimination tolerated in hiring, compensation, access to training, promotion, termination or retirement by the Supplier and people should not be treated differently or less favorably because of characteristics not related to their merit or the requirements of the job. These characteristics include but are not limited to race, caste, nationality, religion, disability, age, gender, gender identity or expression, marital status, family status, pregnancy, sexual orientation, social or ethnic origin, union membership or political affiliation. Suppliers shall prohibit the use of physical abuse, verbal abuse, all forms of harassment (including sexual harassment) or intimidation of workers. Bullying of any kind must not be tolerated.

<b>O'Brien Fine Foods - Quality Manual</b> Date Of Issue - 01.08.2024 Page 1 Of 6 Rev 2 Issued By Nick Reynolds	
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### **Underage Labour**


Suppliers must not employ anyone under the legal working age or benefit from the use of underage workers in either within their company or supply chain. Where young people under the age of 18 are employed, suppliers will ensure that their work is not likely to be harmful to their health and/or development, including no working under hazardous conditions and ensuring compliance with all applicable laws.

### **Employment Practices**

Suppliers must ensure that all employees are provided with wages and benefits that, at a minimum, comply with all applicable laws and regulations. Suppliers must provide all workers with documentation regarding their employment terms and conditions in an understandable way before they enter into employment. Suppliers must ensure that their employees comply with applicable employment laws and regulations relating to work hours and conditions, including overtime, breaks, holiday and maternity and paternity leaves. Suppliers shall only employ workers that are legally permitted to work and are responsible for confirming employee's eligibility through appropriate documentation. Suppliers shall implement effective measures to protect migrant employees against any form of discrimination.

### **Forced Labour and Slavery**

Suppliers shall not permit the use of forced labour, involuntary labour or slavery of any type within their own business or more widely within their supply chain. Forced labour includes any work or service that is obtained from any person under the threat of any penalty, or where that person has not offered themselves voluntarily. Workers shall be free to leave employment in accordance with established local laws and employment practices. Providing wages or other compensation to a worker does not signify that the labour is not forced. Suppliers shall not restrict worker's freedom of movement, require workers to remain at the workplace at the conclusion of their working hours or confine them in any worker accommodation. Where lawful to do so, the supplier shall inform O'Brien Fine Foods immediately if it becomes aware of or has reason to believe that it has breached the Modern Slavery Act 2015.

<b>O'Brien Fine Foods - Quality Manual</b> Date Of Issue - 01.08.2024 Page 1 Of 6 Rev 2 Issued By Nick Reynolds	
Subject: Supplier Code of Conduct	Approved By: Nick Reynolds

### **Freedom of Association and Collective Bargaining**

Suppliers shall respect the rights of employees to join, form, or refrain from joining trade unions and to collectively bargain in accordance with all applicable laws and regulations. Our Suppliers will support this principle and ensure that employees do not suffer any adverse consequences because of their participation in any related labour organisation activities. Suppliers must develop and implement mechanisms for resolving industrial disputes, including employee grievances, and ensure effective communication with employees and their representatives. Suppliers will allow workplace access for such organisations to facilitate their representative functions.

### **Safe and Hygienic Working Conditions**

Suppliers shall provide a safe and humane working environment and through the use of appropriate risk assessments, policies and practices to strive to minimise the risk of work-related accidents, injuries and illnesses. As part of these procedures all Suppliers shall be prepared for emergency situations including evacuation procedures, emergency training, worker notification, first aid supplies and ensure adequate exit facilities and safety equipment. Appropriate training and effective protective equipment shall be provided to all employees to ensure they can safely carry out their job. Suppliers will also ensure that there are appropriate exits, procedures and equipment in place to deal with emergency situations. All workers shall have access to clean toilet and washing facilities, potable water and hygienic storage conditions for food if applicable. Where accommodation is provided for employees, the accommodation must be safe, clean and in line with local laws and regulations while respecting the individual's privacy.

### **Product Integrity**

Suppliers must meet all food safety and quality standards as per applicable laws, industry standards and in line with agreed product specifications. If there is a failure to meet these legal and agreed standards, the Supplier must inform O'Brien Fine Foods.

<p><b>O'Brien Fine Foods - Quality Manual</b></p> <p>Date Of Issue - 01.08.2024</p> <p>Page 1 Of 6 Rev 2</p> <p>Issued By Nick Reynolds</p>	
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### **Animal Welfare**

Suppliers must, at a minimum, comply with all applicable animal welfare laws and regulations. Suppliers must have policies and procedures in place, and accurate records maintained to ensure they are compliant with these laws and regulations.

### **Environment**

Suppliers should carry out operations with care for the environment which comply with all applicable environmental laws and regulations at a minimum. Suppliers must recognise their responsibility to both the local and global environment and must undertake initiatives to minimise their environmental impact and promote greater environmental responsibility through optimising resource consumption, cleaner production, pollution prevention and the creation of products with lower environmental impacts. Suppliers must conduct regular carbon footprint analysis to understand their impact on the environment and put actions in place, as necessary. Suppliers are required to be transparent about their raw material sourcing practices and will share upon request relevant traceability information that supports O'Brien Fine Foods responsible sourcing goals. Suppliers will have plan in place to reduce and eliminate pollution to air, water and soil. Where applicable, wastewater must be tested and treated to ensure that all local laws, standards and regulations are adhered to. Any hazardous chemicals or substances used by the Supplier should be managed in accordance with all applicable laws and regulations.

### **Prevention of Bribery and Corruption**

Suppliers must comply with all applicable laws and regulations in relation to anti-bribery and anti-corruption. Suppliers must have policies, procedures, and practices in place to ensure compliance of these laws. O'Brien Fine Foods will not tolerate bribery or corruption in any form and exercises professionalism and ethical conduct in all business activities. Suppliers are not permitted to offer any gifts, entertainment or other benefits directly or indirectly, which may influence decisions with respect to the company's relationship with the Supplier or which may be perceived as a bribe. Only modest business hospitality from Suppliers that is both reasonable and appropriate in a business context are permitted.

<b>O'Brien Fine Foods - Quality Manual</b> Date Of Issue - 01.08.2024 Page 1 Of 6 Rev 2 Issued By Nick Reynolds	
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### **Competition (Anti-Trust) Law**

Suppliers shall comply with all applicable laws regarding antitrust and competition in the marketplace. All suppliers are expected to conduct business through honest competition. Some legal prohibitions include collective boycotting, allocating sales territories or customers between competitors, fixing prices or discussing future pricing with competitors, and any other unfair method of competition.

### **Conflicts of Interest**

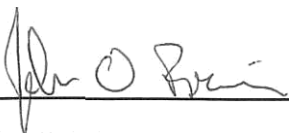
Suppliers must disclose with O'Brien Fine Foods any potential or existing conflicts of interest arising from personal and/or business relationships with O'Brien Fine Foods or its employees. Suppliers should have no relationship, financial or otherwise, with any employee that might result in a conflict of interests in the fair selection of products or Suppliers for the business.

### **Data Privacy and Intellectual Property**

As part of the supplier/customer relationship, both parties will have access to commercially sensitive information. This information must be treated as confidential and must not be shared with third parties without prior consent. Suppliers shall comply with the law on data privacy regulation. Suppliers shall respect the rights of intellectual property.

### **Compliance**

O'Brien Fine Foods requires suppliers to ensure their operations comply with all applicable laws and regulations at a minimum. Alongside that, suppliers shall adhere to O'Brien Fine Foods requirements, including the standards as laid out in this Supplier Code of Conduct. Suppliers must be able to demonstrate compliance with the Code at the request and to the satisfaction of the Company.




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John O'Brien

**Managing Director**

August 2024