



**BO****RTMALT**

**SUPPLIER CODE OF CONDUCT**

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# INTRODUCTION



**Boortmalt pursues a responsible purchasing policy consistent with business ethics, respect for fundamental worker rights, inclusion and diversity, and environmental standards, all of which are key conditions for doing business with Boortmalt.**

This Boortmalt Supplier Code of Conduct is informed by the International Bill of Human Rights and the UN Guiding Principles on Business & Human Rights, the principles concerning fundamental rights set out in the International Labour Organization's (ILO) Declaration on Fundamental Principles, Rights at Work and the 2015 Modern Slavery Act. We strongly believe this is a joint responsibility and we look forward to working with you on driving our businesses in the right sustainable direction.

## Scope

This code applies to all suppliers and is part of any agreement between a member of the Boortmalt group and a supplier. We expect our suppliers to understand what is required and to ensure that supplier's employees as well as supplier's supply chain adhere to the standards set in in this code. Boortmalt is committed to the highest standards of business integrity and as a result will not tolerate any practice that is inconsistent with the principles of honesty, integrity, and fairness. The Suppliers must commit to ensure compliance with this code and all applicable laws and regulations

## Demonstrating compliance

Suppliers are expected to ensure that these obligations are already in place or that there is a clear timeline for full implementation within their own organisation and their associated suppliers and sub-contractors. Supplier must be able to prove its compliance with this code upon request.

Boortmalt reserves the right to audit any of its Supplier's and their sub-contractor's compliance. In the event of non-compliance with this code, supplier shall undertake the necessary corrective actions within a reasonable timeframe. If supplier fails to permit an audit or in the event it fails to correct the non-compliance, Boortmalt may terminate the supply contract without incurring any liability.

## Reporting breaches to the code of conduct

All Suppliers are expected to self-monitor their compliance with this Supplier Code of Conduct. Known or potential breaches should be reported to Boortmalt. Where compliance with this Supplier Code of Conduct could lead to a conflict with or a violation of applicable laws or regulations, the Supplier shall promptly notify Boortmalt of the situation and explain how it intends to operate in a responsible manner.



# BUSINESS ETHICS



All commercial exchanges with our Suppliers are founded on a basis of honesty and this across all aspects of operations both internally and externally.

## **Competition and Fair Trade**

Boortmalt promotes open and fair trade and expects all suppliers to comply with applicable laws relating to competition, fair trade as well as trade sanctions. All transactions will be built on transparency, ethical business practices, confidentiality, and freedom of competition. Our suppliers also commit not to engage in price fixing.

## **Corruption and Bribery**

Boortmalt conducts its business in accordance with the highest standards of ethical behaviour in accordance with all applicable laws and regulations. Therefore, it expects its Suppliers will comply with international anti-bribery standards as stated in the United Nations Global Compact Principle 10 and local anti-corruption and anti-bribery laws including the UK Bribery Act 2010 and all other applicable local laws. In addition, suppliers are required to maintain adequate procedures to prevent their own employees from paying and / or receiving bribes.

## **Conflict of Interest**

Boortmalt expects suppliers not to engage in any activities that create a potential conflict of interest and to also not cause any potential conflict of interest for Boortmalt employees or contractors. Any potential risk should be disclosed immediately.

## **Gifts and Entertainment**

Building relationships is an important part of doing business. However, it is important that suppliers commit not to offer expensive services, lavish gifts, travel, hospitality, entertainment, or other benefits to Boortmalt employees in order to influence the employee's conduct in representing Boortmalt in any jurisdiction. (Boortmalt employees can provide guidelines on the threshold set in the Boortmalt business ethics manual)

## **Record accuracy and retention**

The Supplier shall ensure that business records relating to Boortmalt are securely retained for the period required by law, and that they accurately and fairly reflect all business transactions.

## **Data privacy and protection**

The Supplier shall ensure compliance with laws and regulations relating to data protection and processing of personal data.



# HUMAN RIGHTS & LABOUR STANDARDS

Boortmalt Suppliers must act in line with local legislation, the principles of the United Nations Global Compact, the UN Guiding Principles on Business & Human Rights, the UN Universal Declaration of Human Rights, the 1998 ILO, International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

## **Non-discrimination**

Suppliers shall promote equal opportunities for, and not discriminate against its employees based on race, nationality, social background, disabilities, sexual orientation, pregnancy or maternity, political or religious conviction, sex, age; marital or civil partnership status or any other factor which cannot be legally justified.

## **No harassment**

Suppliers must refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination and prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

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

We expect our suppliers to respect the right of free association of employees and to bargain collectively, in line with applicable laws and regulations. Suppliers must not discriminate against members of employee organizations or trade unions.

## **No Forced Labour**

We expect our suppliers not to employ or make anyone work against their will or under circumstances in which their labour may be coerced and exploited and to comply with all laws relating to anti-slavery and human trafficking.

## **No Child Labour**

Full time employees must be at least 15 years old (subject to exceptions permitted by national law or the ILO) or the minimum age for employment under the applicable law, whichever is higher. We expect suppliers to protect and promote access to education for employees under 18 and to ensure safe working conditions with no exposure to hazardous work that could jeopardise their health and safety or morals.

## **Working Hours**

Our suppliers must ensure that their employees or anyone active in their organization are not required to work more than 48 hours per week or 60 hours including overtime on a regular basis (unless permitted by applicable laws). Employees, contractors, and other people active in the organization are entitled to at least 1 day off in seven and will be given reasonable breaks and sufficient rest.

## **Wages and Benefits**

Suppliers are expected to provide fair remuneration and guarantee the applicable legal minimum wage or industry standards, whichever is higher.



# INCLUSION & DIVERSITY

To deliver an effective and sustainable supply chain Boortmalt has a clear company policy on inclusion and diversity and in line with this also seeks to engage diverse and inclusive Suppliers.

Boortmalt therefore expects its Suppliers to promote a diverse workforce composition actively embracing workforce age, gender, race, national or ethnic origin, religion, language, political beliefs, sexual orientation, physical ability and promoting inclusion throughout their own supply chains.

The Supplier is committed to ensuring its own Supplier selection processes are transparent, objective, non-discriminatory and provide fair and equal opportunities for all organisations





# HEALTH & SAFETY OF EMPLOYEES

Boortmalt expects Suppliers to strive to implement the standards of occupational health and safety at the best level possible and to comply with all relevant local laws and regulations. Suppliers shall provide (documented) adequate training and ensure that employees are educated in health and safety issues. If appropriate, Suppliers shall set up or use an occupational health & safety management system.

## Safe working environment

The Supplier must provide a work environment that is safe and conducive to good health, in order to preserve the health of employees and prevent accidents, injuries and work-related illnesses. This includes providing access to adequate potable drinking water (in line with the World Health Organisation Standards), safely managed sanitation services and hygiene facilities with running water and soap, ventilation, adequate lighting and temperature and personal protective equipment.

Supplier's employees receive health and safety training to mitigate known hazards or potential risk and they are trained in the safe use of the tools, equipment, and the vehicles they operate they. They are also empowered to stop unsafe work and report incidents and unsafe work practices. In summary: the Supplier agrees to take responsibility for the health and safety of its employees, control hazards and take the best precautionary measures against accidents and occupational diseases

## Health and Safety policy and documentation

Suppliers must develop and document their health and safety policy and share this in an appropriate way with their employees. Where required accurate and complete record keeping of accidents and exposure to safety risks is documented and monitored.

## Emergency response and access to medical care

The Supplier will maintain emergency procedures to effectively respond to health and safety emergencies and incidents affecting its employees, sites or the surrounding community. The supplier will provide access to adequate healthcare for the employees.



# APPROACH TO SUSTAINABLE BUSINESS

At Boortmalt Sustainable development is more than a duty, it is a passion. We are determined to make a difference and we look at our suppliers to join us so we can make it happen together. Therefore we strongly encourage our Suppliers to develop a sustainable environmental policy, which aims at minimizing the environmental impact of their operations by reducing water, emissions and waste. For our suppliers that are farmers, Coops or Traders we also look at concepts like regenerative farming and sequestration.

Suppliers commit to act in accordance with the applicable statutory and international standards regarding environmental protection and to minimise environmental pollution and make continuous improvements in environmental protection. In view of our shared commitment the supplier will provide Boortmalt with details of their environmental policy upon request.

## **Water**

Measure water consumption and strive to reduce consumption of fresh water.

In areas of high water risk Boortmalt may reach out to get insights on water used for production or irrigation and to work together on reducing consumption.

## **Carbon emissions**

Measure energy consumption and related carbon emissions associated with operations and provide insights into data when requested. If possible, set a public target, demonstrate progress and support Boortmalt by participating in emission reduction programs.

## **Sustainable agricultural products**

Provide insights in farming practices, in line with CFT (Cool Farm Tool or equivalent carbon monitoring system) data requirements so carbon footprints and improvements can be tracked. Participate in programs with Boortmalt and its customers to reduce the carbon footprint, promote regenerative practices and sequestration.

## **Waste Management**

Measure, manage and report waste when applicable.

Aim to reduce and remove plastic from process and get to zero landfill.





## **BUSINESS CONTINUITY PLANNING**

The Supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, supply chain issues, software viruses). This preparedness especially includes disaster recovery plans to protect Boortmalt, employees and the environment as far as reasonably possible from the effects of possible disasters that arise within the domain of their operations.



## **GOVERNMENT, MEDIA & INVESTOR RELATIONS**

The Supplier shall not instigate any form of publicity or make any statement or submission to investors, the media or government referring to Boortmalt, without first obtaining prior written permission from Boortmalt (except where requested by Government or under the law or contractually agreed with Boortmalt). The Supplier must submit any such request to Boortmalt Group Communications Manager for appropriate authorisation.

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July 2022

