

## ETHICAL TRADING CODE OF CONDUCT FOR SUPPLIERS

### Introduction:

75 years ago; guided by the conviction that the pleasure of sharing high quality products formed life treasured moments known as “the salt of life”, Robert Labeyrie put on our table’s incomparable flavors from “terroirs” with precious know-how.

Today we have that same conviction, but our world is forever evolving. Our planet's resources are limited, and we know that the quality of our food is closely linked with the quality of our environment and our well-being.

If we want to continue to awaken the taste buds of future generations, we must also awaken our own consciousness and that of the consciousness of others around us, thus making the relationship of INTENSE PLEASURE & RESPONSABILITY possible.

That's why working together with our colleagues, partners and consumers, we want to redefine this vision of pleasure we have inherited which drives us.

We want to share a responsible passion for food, one that has been developed via our 3 pillar CSR approach:

**PRESERVATION** of the ecosystems we interact with,

**MASTERY** of our processes and know-how through everyday virtuous practices,

**RESPECT** of the men and women who produce, process and consume our products.

**Our mission, as a group is to give as many people as possible the keys to responsible pleasure consumption. Our “raison d’être” is to share a responsible passion for food.**



As a responsible group, Labeyrie Fine Foods (LFF) has defined its requirements for all aspects of sustainable development. We are particularly aware of the impacts of our procurement and the services we use.

As part of its sourcing policy, Labeyrie Fine Foods (LFF) has therefore put in place responsible sourcing guidelines, on the themes of traceability and transparency, certifications and specifications and implementation, and the implementation of a surveillance programme in

its value chains. These principles will guide with the selection of our suppliers and the nature of our relationship.

These principles are as follows:

- Make every effort to ensure 100% traceability & improve transparency within all our value chains
- Only select suppliers who have set up a management system and meet the criteria of high standards of quality and food safety (HACCP, FSSC 22000, SQF, GFSI or other)
- Prioritise environmentally and socially certified raw materials, when these certifications exist and when they meet our challenges, needs and requirements.
- Set up a surveillance programme to cover ethical, human rights and environmental dimensions, on all our raw materials, through assessments and regular dialogue using dedicated tools such as SEDEX and FNET (Food Network of Ethical Trade). In the event of major risk being identified, we endeavour to working with a third-party NGO, which can identify the real risks, and, if necessary, support us and our partner in implementing the required mitigation plan.

By adhering to this Supplier Code of Conduct, our suppliers are committed to meeting the stated expectations and accepting any verifications that will be carried out or required by the Labeyrie Fine Foods Group. Labeyrie Fine Foods (LFF) is committed to work with its suppliers in engaging in a continuous improvement process on the issue of ethics and business ethics.

By signing this code of conduct suppliers are committed to work with their own subcontractors and suppliers within the LFF supply chains and guarantee adoption and implementation of this Supplier Code of Conduct by their subcontractors and suppliers and the obligations in force in the country of origin but also that of the exporting country.

In the event of violation of this Supplier Code of Conduct by one of its suppliers or by a supplier or subcontractor thereof, Labeyrie Fine Foods (LFF) reserves the right to review and, possibly, put an end to the commercial relationship, under the conditions provided for by applicable law, without prejudice to the other rights of Labeyrie Fine Foods (LFF) or recourse it may exercise.

Labeyrie Fine Foods (LFF) also has a “Code of ethics and good business conduct” which clearly defines the rules of ethics and conduct applicable to all permanent or occasional employees of the Labeyrie Fine Foods Group. A whistle blower alert procedure is also in place on these matters. Suppliers, as a stakeholder in the Labeyrie Fine Foods Group, can also alert Labeyrie Fine Foods (LFF) Ethics liaison Officer when serious behaviour prohibited by law or by this “Code of ethics and good business conduct” is observed.

At Labeyrie Fine Foods, we recognise that there are various social and environmental impacts associated with the production of our raw materials and we are fully committed to sourcing all our raw materials in the most responsible way.

## Compliance with regulations

All LFF suppliers must have systems in place to manage critical legal aspects to ensure that they comply with the requirements of all local, national, and international (usually the importing country) laws and codes of practice.

## Requirements in terms of ethics and business conduct

**We are committed to acting with integrity and transparency in all our business dealings and to putting effective systems and controls in place to safeguard against any forms of bribery, corruption and modern slavery in our business and supply chains.**

- Corruption: Labeyrie Fine Foods applies a “zero tolerance” policy about corruption (active or passive) and influence peddling. We expect our Suppliers to comply with all applicable laws relating to fight against corruption and that they take appropriate measures to prevent, detect and sanction any fact relating, directly or indirectly, to corruption or influence peddling in the course of their activities. This includes extortion, money laundering, fraud, and bribery. Labeyrie Fine Foods relies on the French and international laws in force, such as regulation No. 2016-1691 of 9 December 2016 on transparency in the fight against corruption and to the modernization of the economy (e.g. Loi " Sapin 2" and the UK Bribery Act, 2010) .
- Gifts and Hospitality: Gifts and hospitality may be acceptable expressions of courtesy in the context of established business relationships if their scope and value are limited, if offered openly and transparently, if local law or law is required, if customary practice in the country allows this practice, if they are intended to reflect consideration and recognition and if they are not offered with the expectation of a counterpart (including the counterparts requested in the form of a political contribution, charitable or associative).
- Prevention of conflicts of interest: our suppliers must comply with all applicable legislation on conflicts of interest and strive to prevent the occurrence of situations creating a conflict of interest in the context of their collaboration with the Labeyrie Fine Foods Group. Our suppliers are also required to disclose any situation that may appear to present a conflict of interest and bring to the attention of Labeyrie Fine Foods where an employee could have any interest in the activities of the Trading Partner or a personal economic link with the latter.\_
- Respect for competition: our suppliers are expected to take preventive measures to avoid any anti-competitive practice or behaviour. This covers the prohibition of abuse of a dominant position, concerted practices, and unlawful agreements between competitors.\_
- Privacy and Intellectual Property Rights: The suppliers respect the confidentiality of information received owned Group Labeyrie Fine Foods and will never use this information for their own benefit. The information transmitted in the exercise of the activities must be exact and fair and must not mislead. The providers take steps to ensure respect for the rights of ownership intellectual.

- Personal data protection: The suppliers comply with the applicable laws and regulations regarding the protection of personal data.
- Transparency of information: The providers agree to work in a transparent and accountable as part of their business.

### Respect for social and human rights standards

**We are conscious of the responsibility we share with our suppliers and customers for the welfare and safety of workers who produce the goods we buy, manufacture, and sell. We are committed to ensuring that all workers involved in our supply chains are treated fairly and that all our products are sourced and produced under a set of socially equitable criteria.**

**This involves promoting and respecting the International Labour Organization (ILO) declaration on fundamental principles and rights at work, as well as international human rights law. The supplier must ensure that the principles set out below are enforced on their sites and those of their suppliers. They cannot in any case be complicit in human rights abuses.**

- Child labour shall not be used: The suppliers must respect the minimum legal age limit for admission to employment, defined by conventions 138 and 182 of the ILO, e.g. 15 years, increased to 18 years for dangerous, difficult or night work. In countries where local legislation provides for a higher working age or extends compulsory education beyond 16, the higher age applies. All young workers have the right not to be required to do any work which may be dangerous, interfere with their education or be detrimental to their health, physical, mental, social, spiritual, or moral development.
- Prohibition of forced labour: The use of forced, illegal, clandestine or undeclared labour, slavery, servitude, unpaid prison labour or human trafficking by our suppliers, as well as the detention of identity papers or work permits, the requirement of any security deposit from the workers, or the use of any other constraint, are strictly prohibited. Every worker has the right to accept or leave a job freely. The supplier cannot require workers to work off a debt owed to them or owed to a third party.
- Prohibition of discrimination, abuse and equitable treatment in the workplace: Suppliers do not practice nor tolerate any 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. The conditions of employment of any individual will depend on their skills. Suppliers are committed to treating all employees with respect and must not inflict corporal punishment, use physical or moral coercion, any form of abuse, harassment, or threats of such treatment.
- Wages and Benefits: The suppliers conform to all regulations relating to remuneration, including those on the 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 discretionary income. All workers shall 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 they are paid. Deduction from wages as a disciplinary measure shall not be permitted nor shall provide any deductions from wages not provided by the national law be permitted without the expressed permission of the worker concerned.

- Working time: Our suppliers must comply with applicable laws and local regulations, which may in no case exceed the maximum set by internationally recognized standards such as those of the ILO. The total number of hours worked per week, including overtime, cannot exceed the legal limits and exceed a maximum of 60 hours per week (or 48h excluding overtime). Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, 2 days off in every 14-day period.
- Freedom of Association and Right to Collective Bargaining: Suppliers recognize and respect an employee's right to freedom of association and collective bargaining as supported by international standards. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace. 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.
- Working conditions are safe and hygienic: The Suppliers shall ensure that their activities do not damage the health, hygiene and safety of their employees, their own suppliers, and local communities. This involves providing personal protective equipment to their employees and establishing procedures and training to detect, avoid and mitigate, as far as possible, any danger that could represent a risk to health, hygiene, and safety. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- Working environment: The Suppliers strive to maintain a work environment where employees benefit from training opportunities and development professional, reward for their contribution and constructive dialogue with their employer.

### Respect the environment

***For the conduct of its business, Labeyrie Fine Foods expects its suppliers to comply with all local and national environmental laws and regulations in place, and to implement a risk assessment approach to detect, identify and evaluate potential environmental risks linked to their activity .***

Suppliers must recognise their duty of care for the wider environment & take all reasonable steps to minimise negative impacts to the environment at all stages of production.

Labeyrie Fine Foods requires its suppliers to commit to:

- Implement an environmental management system,
- Implement a continuous improvement plan and reduce the environmental impacts of its processing sites, ensuring a good waste management programme, the elimination of air, water and soil pollution, the reduction of greenhouse gas emissions, the promotion of the use of

renewable energies, the reduction of water and energy consumption and the appropriate management of hazardous chemicals,

- Evaluate the impacts of their activity on biodiversity, the risks of deforestation and commit to supporting our action plan to identify and put an end to the import and export of products contributing to deforestation in our sectors. LFF supports the National Strategy to combat imported deforestation (SNDI) adopted in November 2018.
- Guarantee that staff whose activities have a direct impact on the environment, are trained competent and have the necessary means for effective performance of their roles and missions.

### **Respect for the principles of animal welfare**

We seek to promote animal welfare and work towards progressively improving standards of well-being. It is essential that staff managing farming operations in our supply chains are aware of the importance of welfare as an integrated part of production.

Personnel involved in animal slaughter and harvesting must be thoroughly trained and competent to carry out the required tasks.