

Annington Limited

Supplier Code of Conduct – Slavery and trafficking

1. INTRODUCTION

1.1 Annington is committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers, contractors and business partners to adhere to the principles in this Code, in accordance with our Anti-Slavery Policy and contractual terms of engagement. We expect you to require the same standards of your own sub-contractors, suppliers and business partners.

1.2 CODE OF CONDUCT: PRINCIPLES

1.3 Workers shall not be subject to forced, prison, bonded, indentured, slave, trafficked or compulsory labour in any form, including forced overtime. All work must be carried out voluntarily.

1.4 Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice in accordance with applicable laws and collective agreements, and without the imposition of any improper penalties.

1.5 Workers shall not be mentally or physically coerced to provide their labour.

1.6 Workers shall not have their identity or travel permits, passports, or other official documents or any other valuable items confiscated or withheld as a condition of employment and the withholding of property shall not be used directly or indirectly to restrict workers' freedoms or to create workplace slavery.

1.7 Fees or costs associated with the recruitment of workers (including but not limited to fees related to work visas, travel costs and document processing costs) shall not be charged to workers whether directly or indirectly. Similarly, workers shall not be required to make payments which have the intent or effect of creating workplace slavery, including security payments, or be required to repay debt through work.

1.8 Workers shall have their terms of their employment or engagement set out in a written document that is easily understandable to them and which clearly sets out their rights and obligations. This written document shall include, but not be limited to, transparent terms with respect to wages, overtime pay, payment periods, working hours and rights in respect of rest breaks and holiday. Such written terms shall be provided to the worker in advance of them starting work, shall be honoured by the employer and shall meet industry standards and the minimum requirements of applicable laws and collective agreements where the work is carried out.

1.9 There shall be no use of child labour. Nobody shall be employed under the minimum age. Subject to the overriding prohibition on the use of child labour, if workers under the age of 18 are employed then particular care shall be taken as to the duties that they carry out and the conditions in which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions.

1.10 Workers, their families and those closely associated with them shall not be subject to harsh or inhumane treatment including but not limited to physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation. Migrant workers, their families and those closely associated with them should not be subject to discrimination due to their nationality.

1.11 Workers shall be free to file grievances to their employers about the employer's treatment of them and workers shall not suffer detriment, retaliation, or victimisation for having raised a grievance.

1.12 Workers shall be free to move without unreasonable restrictions and shall not be physically confined to the place of work or other employer controlled locations (for example accommodation blocks) nor shall they be confined by more indirect means. There shall be no requirement placed on workers that they take accommodation in employer controlled premises except where this is necessary due to the location or nature of the work being performed.

1.13 Where it is necessary to recruit workers who are engaged via a third party, such as an employment agency, then only reputable employment agencies shall be engaged. Where workers are sourced to be employed directly, only reputable recruitment agencies shall be engaged. All such agencies must have the necessary licences and registrations under local laws; agree to adhere to this Code of Conduct; and agree to be audited to ensure their compliance with this Code of Conduct.

2. **WHISTLEBLOWING**

- 2.1 Any person concerned about a breach of this Code or our Anti-Slavery Policy may report their concerns on a confidential basis to our helpline hosted by NGA Human Resources, the contact details of which are tel: 0845 299 0243 or hr.adviceline@ngahr.com. Individuals with concerns are encouraged to provide their name and contact details so that the issues that they raise can be investigated most. However, we recognise that in some circumstances an individual will only be prepared to raise their concerns on an anonymous basis and we commit to investigate anonymous allegations as thoroughly as possible and to take the necessary remedial action.
- 2.2 Contractors and their subcontractors are to ensure that details of our whistleblowing helpline are made available to all workers.