



avara
foods

SUPPLIER CODE OF CONDUCT

UPDATED: MAY 2024



ABOUT US

Avara Foods is one of Britain's leading food businesses, supplying chicken and turkey to the retail and foodservice sectors. Every day, we deliver great quality food to an impressive range of customers across the UK and Europe.

We own and manage every part of our supply chain; from feed mills and farms, through to processing, packing and distribution. We do it by focusing on high standards, great service and a culture where our people make the difference.

Our Values are what we stand for, what we believe in and what others can depend on us to uphold, whatever the situation. They reflect how our colleagues see us now, but also what we want to be in the future.

DOCUMENT PURPOSE

Avara Foods seek to build lasting relationships with our suppliers. The purpose of this Supplier Code of Conduct is to clearly communicate our commitment to the principles and ethical values we want to uphold and to reinforce honest conduct and ethical behaviour. This code sets clear expectations of Avara suppliers in the areas of:

- **Human rights**
- **Ethical trading, environment and conduct**
- **Compliance of the code**

This code will enforce the Ethical Trading Initiative (ETi) Base Code which is a private code agreed among ETI business, NGO and Trade Union members. It draws on the conventions of the International Labour Organisation (ILO).



SECTION 1: HUMAN RIGHTS

This section is in line with the ETi Base Code

EMPLOYMENT AND HUMAN RIGHTS

We expect all our suppliers to have internal fair employment policies and practices. They must comply with applicable local employment laws and regulations to ensure that their employees are equally valued, supported, respected and treated fairly, with dignity within a safe working environment. As a supplier to Avara you have the responsibility to ensure there is no slavery or forced, bonded or involuntary prison labour within your organisation and supply chain.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

We expect our suppliers to recognise and support the principle that that workers, without distinction, to have the right to join or form trade unions of their choosing and to bargain collectively without discrimination.

WORKING CONDITIONS ARE SAFE AND HYGIENIC

We expect our suppliers to provide a safe and hygienic working environment. Steps should be taken through regular risk assessments, policies and practices to prevent accidents and injury to health associated with or occurring in the course of work. Steps should be taken to identify hazards and minimise causes of incidents in the working environment. Suppliers must give workers regular and recorded health and safety training and provide first aid supplies and ensure adequate safety equipment is provided.

CHILD LABOUR SHALL NOT BE USED

Our suppliers should ensure they work in line with our Child Remediation Policy at all times. They should not, under any circumstances, employ any person under the legal working age, or benefit in any way in their supply chain from the use of under-age workers.

LIVING WAGES ARE PAID

We expect our suppliers to pay their workers, at a minimum, national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs and to provide discretionary income.

WORKING HOURS ARE NOT EXCESSIVE

Working hours for our suppliers' workers must comply with national laws and collective agreements. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. All over time should be voluntary and always compensated at no less than 125% of the regular pay rate. Working hours may exceed 60 hours in any 7 day period but only in exceptional circumstances set out in 6.5 of the ETi Base Code.

NO DISCRIMINATION IS PRACTISED

Our suppliers must not discriminate 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.

REGULAR EMPLOYMENT IS PROVIDED

To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. We expect our suppliers to comply with this and not to use agency contracts for long term positions or employ people on zero hours contracts.

NO HARSH OR INHUMANE TREATMENT IS ALLOWED

Avara has robust policies, processes and management in place to prevent bullying, physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. We expect our suppliers to take the same approach.



SECTION 2:

ETHICAL TRADING, ENVIRONMENT & CONDUCT

ENVIRONMENT

Avara Foods is committed to conduct business activities in a manner that is environmentally responsible and sustainable. We expect our suppliers to comply with all applicable environmental regulations and work consistently to minimise their environmental footprint and prevent pollution. Suppliers must be working towards:

- minimising pollution to air, water and soil
- prevention of deforestation
- minimising waste
- CO2 reduction
- Water usage reduction
- Sustainable use of plastics with targets to remove single use plastics

Waste water, hazardous material, chemicals and substances used by suppliers must be responsibly disposed of to protect the environment.

BUSINESS INTEGRITY

Avara Foods seek business relationships based on trust, transparency and mutual accountability. We expect our suppliers to conduct business ethically and in accordance to all applicable laws and regulations.

ANTI-CORRUPTION & BRIBERY

We are committed to ensuring that fair and transparent business relationships exist throughout our supply chain. This means that we do not enter into supplier agreements or relationships based wholly or partly on any incentive that may be received whether financial or otherwise. We have a zero tolerance anti-bribery and corruption policy in line with the UK Bribery Act (2010) and we expect our suppliers to have the same.

PROTECT AVARA'S INFORMATION, ASSETS AND REPUTATION

Avara Foods expects our suppliers to protect our reputation and any information or assets we entrust to them. This includes but is not limited to, our processes, intellectual property, trade secrets or financial information.

DATA PROTECTION

We expect all our suppliers to comply with GDPR Regulations and where confidential information is held it is only used to fulfil commitments to Avara. Suppliers should keep confidential information safe and secure and not share this with anyone unless prior agreement by Avara Foods.

CONFLICTS OF INTEREST

We expect our suppliers to disclose all actual or potential conflicts of interest arising from either personal or business relationship with Avara Foods or its employees.

SOCIAL MEDIA

Suppliers must not appear, or claim, to represent Avara Foods on social media. We reserve the right to act if a supplier's social media posts:

- Are derogatory, offensive, discriminatory or contain defamatory comments about the company or anyone else associated with our business.
- Break confidentiality or contain commercial sensitive info.
- Include content that could be regarded as abusive or bullying.

Any personal technology, e.g. camera phones, must only be used with express permission from the site manager (or equivalent) and only if required for professional reasons.

We will review any concerns on a case-by-case basis, and we reserve the right to terminate supplier contracts should any of the instances, above, be identified. In all cases, we will endeavour to work with suppliers to ensure that social media is used as a positive influence.



SECTION 3: COMPLIANCE TO THE CODE

REPORTING OF VIOLATIONS OF THIS CODE

Our suppliers must notify us of any violations of this code. Where issues are raised we would expect our suppliers to be open and forthcoming so that we can work together to understand and resolve any issues.

You may raise a concern by contacting your Avara representative.

FAILURE TO COMPLY WITH THIS CODE

Our aim is to work in partnership with suppliers to improve the strength of our supply chain. This Code of Conduct is not just about setting rules, it's a summary of the way we want to work and the way we think responsible businesses should operate. If a supplier consistently fails to fulfil the expectations within the Code or is unwilling to engage, we reserve the right to end our relationship.



For more information about Avara Foods please visit our website at: www.avarafoods.co.uk

For any specific questions about this Code please contact your Procurement representative at Avara Foods.