

UPHOLDING HUMAN RIGHTS IN OUR SUPPLY CHAINS: SUPPLIER PARTNER REQUIREMENTS



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OUR COMMITMENT AND RESPONSIBILITY

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“Continuous improvement towards best practice ethical trade and sustainable sourcing is at the heart of how we do business”.

John Burton, Chairman & Chief Executive

Continuous improvement towards best practice ethical trade and sustainable sourcing is at the heart of how we do business. The World Wise Foods Group is committed to ensuring that all workers in our supply chains are treated with dignity, and that their human rights are respected.

The World Wise Foods Group fully supports the UN Guiding Principles on Business and Human Rights¹ and we take seriously our responsibility to prevent, mitigate and remediate human rights abuses.

The World Wise Foods Group is ambitious, we aim to continue to lead the way on responsible sourcing and to support our supplier partners to engage and respond to its challenges and complexities. This ambition is driven by my personal commitment to ensuring that the success of the World Wise Foods Group is built on conscious choices to do business in a way that has a positive long term social, economic and environmental impact.

This document seeks to outline our expectations of supplier partners with regards to human rights. We expect our supplier partners to adopt this policy or develop their own. The approach we take to ensure compliance to this policy can be found in our [Responsible Sourcing Code of Practice](#).

John Burton, World Wise Foods Group Chairman and Chief Executive

If you require any further information, please contact: ethicaltrade@worldwisefoods.co.uk

¹ Translations of the UN Guiding Principles on Business and Human Rights can be found [here](#), they are also explained in [this](#) short video.

HUMAN RIGHTS IN OUR SUPPLY CHAINS

HUMAN RIGHTS IN OUR SUPPLY CHAINS

The World Wise Foods Group recognises that economic globalisation has resulted in more complex supply chains and that this complexity makes it challenging to both identify, and influence human rights practices. These dynamics make some workers significantly more vulnerable to exploitation than others. The World Wise Foods Group has identified the three most vulnerable groups of workers within our supply chains as:

- **Migrant workers:** There are now significantly more migrant workers than ever before; increasing numbers of workers are seeking opportunities to earn and send remittances home and there has also been increased demand in host countries for low skilled labour. Migrant workers make a significant contribution to the World Wise Foods Group's success.
- **Women:** Alongside migrant workers, we recognise that women are also vulnerable within our supply chains and need additional provisions to ensure their rights are considered and met.

- **Child labour and young workers:**

Although 18 is the expected minimum employment age for our supplier partners, we recognise the potential that young workers could be employed and that they are inherently vulnerable. There is also the potential risk of child labour in agriculture which is the primary source of all our ingredients.

This policy focuses on ensuring all workers are treated equally in the workplace and outlines the extra provisions required to ensure the human rights of these vulnerable groups are met.

While this policy focuses specifically on people in our supply chains, we also recognise the connection between human rights, responsible sourcing of ingredients, and protecting the environment.



SUPPLIER PARTNER RESPONSIBILITY

SUPPLIER PARTNER RESPONSIBILITY: INTRODUCTION



The World Wise Foods Group expects supplier partners to protect and uphold human rights as outlined in this document and as prescribed in local and international law. The World Wise Foods Group will always support supplier partners who are honest and transparent about their operations and who are committed to implementing shared action plans.

The World Wise Foods Group expects our supplier partners to comply with the audit expectations of our retail customers, as well as actively engaging with our Ethical Trade team and implementing any ethical action plans that result. Supplier partners should expect a high level of engagement from the World Wise Foods Group if they are operating in high risk countries² and/or employ vulnerable workers.

As a food company our products have multiple ingredients from multiple sources; our ability to identify and improve human rights in our supply chains beyond tier one³ is rooted in our relationships with our supplier partners and their onward implementation of our approach further down the supply chain. We expect our supplier partners to share our, or their, human rights policy with their suppliers, and to engage in ethical supply chain focused initiatives with the World Wise Foods Group.

² The World Wise Foods Group is part of the Food Network for Ethical Trade, a group of suppliers and retailers which aims to address human rights risks in global food supply chains through a common approach. We use the FNET risk rating tool to determine high risk countries in our supply chains. These currently include Thailand, China, Philippines, Indonesia, India, Malaysia, Swaziland and Morocco.

³ Tier one are suppliers the World Wise Foods Group purchases products from directly.

SUPPLIER PARTNER RESPONSIBILITY: MINIMUM STANDARDS

The World Wise Foods Group expects all supplier partners to meet minimum labour standards. The expectation is that they will be:

- compliant with local laws
- actively engaged in continuous improvement towards the Ethical Trade Initiative (ETI) Base Code which is recognised by our retail customers
- committed to becoming a responsible, responsive employer

The approach we take to ensuring these expectations are met by supplier partners can be found in the [World Wise Foods Group Responsible Sourcing Code of Practice](#).

Where [ETI base code](#) and local law do not align we expect supplier partners to follow whichever makes the best provision for workers' needs in the local context.

THE ETI BASE CODE

1. Employment is freely chosen.
2. Freedom of association and the right to collective bargaining are respected.
3. Working conditions are safe and hygienic.
4. Child labour shall not be used.
5. Living wage shall be paid.
6. Working hours are not excessive.
7. No discrimination is practised.
8. Regular employment is provided.
9. No harsh treatment of workers is allowed.



SUPPLIER PARTNER RESPONSIBILITY: RESPONSIBLE, RESPONSIVE EMPLOYERS

Engaged, productive workers are the foundation of every successful business. The World Wise Foods Group believe that all workers not only want fair reward and a good quality of life, but that they also want the opportunity to fulfil their aims and ambitions. Equally, it is the leadership in any business that determines working culture; how a business thinks about its workers shapes and informs how every worker is treated.

When companies bring large numbers of workers together, including migrant workers who can be perceived as outsiders, there is dangerous potential for the de-humanisation of workers; management can start to see workers as production units rather than as people. De-humanisation results in workers accepting poor treatment and reduces the likelihood they will report abuses. For those in authority de-humanisation is a form of moral disengagement; behaviours that we all know are unethical and unfair become accepted and rationalised.

The World Wise Foods Group expects its supplier partners to go beyond meeting minimum standards. It is our ambition that all our supplier partners will be responsible employers; they will go above and beyond to ensure that their working culture is founded

on dignity and respect for all employees. Being a responsible employer goes beyond ensuring the rights of workers; it includes establishing ethical behaviours across the business, appreciating and recognising workers contribution to the workplace and actively supporting the integration of vulnerable workers in the workplace and wider community.

The antidote to de-humanisation is meaningful, responsive engagement between all levels of management and workers. The World Wise Foods Group recognises that workers are the most legitimate defenders of their own rights. All supplier partners must have clear grievance mechanisms in place that are accessible and trusted by workers. The World Wise Foods Group accepts and recognise the universal right to collective bargaining and, in the absence of unions, we expect all our supplier partners to have an active, engaged worker committee.

The World Wise Foods Group also encourages supplier partners to invest in worker voice; through direct access to Human Resources, worker committees, worker satisfaction surveys and employee hotlines, workers can play a critical role in driving workplace improvements that increase employee satisfaction and retention.





SUPPLIER PARTNER REQUIREMENTS: WORKPLACE EQUALITY

SUPPLIER PARTNER REQUIREMENTS: WORKPLACE EQUALITY

The World Wise Foods Group believes that the equal treatment of all workers regardless of age, gender, religion, caste or nationality is the essential foundation of ethical employment practices.

In order to secure equality in the workplace we expect our supplier partners to comply with the following practices:

A. RECRUITMENT

1. The age of applicants must be checked. A remediation process must be in place where under age workers are recruited.
2. Employers must ensure workers have a clear understanding of the site, role, performance requirements, skills, terms, conditions, pay and benefits before they agree to employment.
3. No worker should pay for a job (see migrant worker requirements for full details).

B. ORIENTATION AND TRAINING

1. It is the responsibility of employers to ensure workers have a clear understanding of their rights and employment arrangements.
2. All workers must receive adequate orientation and an employee handbook which covers legal rights and obligations, employment terms, pay, benefits, employer rules and regulations, disciplinary systems, how workers can communicate with management (worker voice) and grievance procedures.

C. EMPLOYMENT TERMS

1. All workers must have a written contract of employment in their own language. Ideally employees should be contracted directly and not through recruitment agents, sub-contractors or labour providers. The only exception to this is ad hoc temporary staff; employers must have a formal procedure for moving these staff to direct employment should their working pattern become regular. Short term contracts must not be used as a mechanism to avoid social security, pay or benefits obligations.

2. Where workers are not employed directly – such as through recruitment agents, sub-contractors or other labour providers - it is the supplier partners responsibility to ensure the employer is meeting legal, contractual and best practice employment standards. This should be verified through regular internal auditing (note: some customers may request external audits of labour providers).
3. Contract terms and conditions, including pay and benefits, must be the same for all workers starting in the same roles, regardless of age, gender, religion, caste or nationality.
4. In either the contract, or employee handbook the following must be specified;
 - Any benefits including medical coverage, holiday pay, sick pay, bonus schemes, annual leave and public holidays, transport, accommodation and meal provision
 - Any disciplinary procedures. Pay deductions and fines must not be used as disciplinary measures.
5. Description of work, employer address and work location, length of contract and renewal conditions, probation period and terms, regular hours, permitted breaks, gross/net rate pay, pay schedule, overtime wage rates, legal wage deductions, legally allowed overtime, notice periods and grounds for contract termination
6. Employers must not retain workers' identity documents. A document retention policy must be signed by workers explaining the process when identity documents are required by the employer for permit processing. All workers must be offered safe, lockable storage for their documents.
7. Changes to contracts, even when required by law, must only be made after adequate explanation.
8. Workers must have equal opportunity for promotion and career progression.

D. WORKING HOURS

1. Overtime must be voluntary in principle and practice. Overtime must be specified as voluntary in workers contracts and requests to do overtime must be made with enough notice that workers are not pressured to accept overtime. There must be no negative implications for refusing to work overtime.
2. Employers should have a system in place that can verify working hours for each worker – standard hours, overtime hours and total hours worked. A system should be in place that identifies when working hours are going to exceed the legal limit and which ensures workers receive rest days as below.
3. Employers are expected to comply with local law on working hours and overtime. Where legal working hours are higher than ETI base code, additional safeguards must be in place to ensure rest days are observed (1 day off in 7, or 2 days off in 14) and connections between long working hours and accident rates, production efficiency and product quality must all be closely monitored.

E. PAY

1. All workers must at least receive the locally defined minimum wage, holiday pay and sick pay as defined by local law. Overtime should be paid at a minimum of 125% as defined in the ETI base code, or as per local law where this is higher. Employers must be aware of and working towards meeting living wage/income levels.
2. Wages must be paid regularly and on time. Wages must go into the workers bank account of choice and the account must be in their name. No payments should be made via third parties. Delayed or withheld payments are prohibited.
3. No deductions other than those required by national law must be made from worker's payments. Any legal deductions must be outlined clearly in contracts and payslips. Forced savings schemes are prohibited. Performance issues must be managed through disciplinary procedures, not through pay deductions.
4. All workers must receive a detailed payslip listing all payments including overtime payments and legitimate deductions. If providing payslips in workers own language is not possible, employers must display translations of payslips for workers. It is the responsibility of employers to ensure workers understand their payslip.

F. BENEFITS

1. Employers must pay for any Personal Protection Equipment (PPE) or uniforms required for workers to fulfil their job requirements. Replacements must be available within a reasonable timeframe.
2. Access to healthcare must be provided for all workers.
3. Workers must have access to injury compensation in cases of injury.
4. Workers must have the freedom to choose to live in private accommodation or accommodation provided by employers (where available). Workers freedom of movement must not be restricted.
5. All accommodation provided by employers must be safe, clean and hygienic, with potable running water and adequate sanitary facilities. Secure lockers must be provided for storage of personal items. Buildings must comply with building regulations and multiple occupancy regulations.
6. Where employers offer accommodation, or facilitate access to accommodation, they are responsible for regularly checking that living conditions meet required standards.

7. Employers must ensure workers have access to safe transport between the workplace and their accommodation, particularly after dark. Organised transport must be frequent enough so that it does not negatively impact personal time.
8. Employers must enable access to food that complies with religious requirements either through provision on site or allowing workers to bring food onto site.
9. Employers must provide or facilitate access to social and leisure activities for workers who live on site.

G. WORKER REPRESENTATION

1. Where allowed by national law all workers must have the right to choose whether to form or join trade unions and to bargain collectively.
2. Where unions are prohibited by law, or are not available, employers must ensure democratic representation of workers through a freely elected worker committee. Suppliers are responsible for ensuring that vulnerable workers such as women or migrant workers are effectively represented. Worker committee meeting minutes must be displayed where all workers can read them in accessible languages. Members of the worker committee

must be made visible to all employees through their names, or photos being displayed on an accessible notice board.

3. Employers must be able to demonstrate worker committees are representative, active and contributing to site improvements.

4. There must be no penalty, or threat attached to worker organisation.

H. HEALTH AND SAFETY

1. Workplaces must be safe and hygienic, and workers must receive adequate health and safety training for their specific roles before they start work.

2. It is the responsibility of employers to ensure workers understand their health and safety rights and responsibilities.

3. Employers must include worker engagement in health and safety monitoring through establishing clear communication channels and by including workers in the membership of an active health and safety committee.

I. WORKER PROTECTION AND GRIEVANCE PROCEDURES

1. All workers must work free from harassment; the use of violence, threat or intimidation of any kind is strictly prohibited. Sexual harassment of workers in any form is unacceptable and complaints must be addressed sensitively and confidentially. All worker harassment must be regarded as a serious disciplinary offence.

2. Employers must respect worker's religious practice, make appropriate facilities available for religious observance and enable access to places of worship for men and women.

3. Employers will ideally offer a number of confidential communication channels for workers to raise complaints or concerns. With the exception of sensitive issues, employers must have a system in place that shares with workers, for example through the worker committee, the employer's response to all the issues raised through the different communication channels available. The more workers hear their employer responds to their concerns, the more they will communicate. Within any communication by the employer on issues raised by workers, it is essential that worker's confidentiality and anonymity is respected.

4. All workers must have access to credible grievance mechanisms, without fear of financial penalty, intimidation, recrimination or dismissal.

5. When grievances have occurred, all workers must have access to remedy, including appropriate compensation. All workers must have access to judicial remedy.

J. END OF EMPLOYMENT

1. All workers must be able to terminate their employment with reasonable notice (as specified in their contract) without penalty.

2. Freedom to change employment must be respected and legal requirements followed.

3. At the end of a contract all workers must be paid outstanding wages and any other benefits or savings accrued in full before they leave.

4. Workers must not face dismissal for any medical reason that does not impede their ability to do their job (e.g. HIV status). Where dismissal is required by law, appropriate remediation must be made to the workers.

SUPPLIER PARTNER REQUIREMENTS: MIGRANT WORKERS

SUPPLIER PARTNER REQUIREMENTS: MIGRANT WORKERS

Migrant workers make a significant contribution to the economies of their host countries and home countries through remittances; migrant workers directly contribute to the success of The World Wise Foods Group.

We recognise that migrant workers are a vulnerable group within our supply chains; language barriers can affect how well contractual rights, obligations and training are understood.

Migrant workers may not be aware of local legislation, cultural norms and practices. Workers who arrive through recruitment channels where fees have created indebtedness are particularly vulnerable to bonded labour and exploitation; staying in paid employment can be prioritised over speaking up about harassment, discrimination or unacceptable living conditions.

The World Wise Foods Group supports the [Dhaka Principles](#)⁴ for migration with dignity.



⁴ Translations of the Dhaka Principles can be found [here](#).

The World Wise Foods Group believes in worker equality. To ensure this for migrant workers extra provisions are needed. As well as complying with the practices outlined under Workplace Equality in this policy, we expect our supplier partners to comply with the following practices:

A. RECRUITMENT

1. Migrant workers under the age of 18 must not be recruited. Employers must check the age of applicants and have a remediation process for instances where under age workers are recruited.
2. Where possible employers must recruit migrant workers directly. Where this is not possible recruitment agencies must be legally registered and audited.
3. Employers must ensure workers have a clear understanding of the site, role, performance requirements, skills, terms, conditions, pay and benefits before applicants agree to employment.
4. All successful applicants must receive pre-departure training which includes contract details, documentation, information on the host country, specifics on the job role, conditions of work, pay, benefits, skills, performance

required and access to complaint mechanisms after arrival. Pregnancy testing must not be conducted unless it is required by local law.

5. Employers must have a policy which prohibits charging migrant workers for recruitment, placement and repatriation costs.
6. Employers must have a policy which prohibits acceptance of any form of bribe from workers to secure employment, or recruitment agencies to secure employment contracts; these actions by an employee must be considered a serious disciplinary offence.
7. Employers must cover all costs of workers becoming their employees; these include agency fees, placement fees, transport costs, taxes, worker cards/permits and renewals, visa costs, medical costs, pre-departure training, orientation, insurance, and employer contributions to social security. Employers are responsible for any costs when contracts or documents need to be renewed.
8. Employers and recruitment agents must provide successful applicants with a breakdown of expenses that are to be covered by the employer and any that are to be covered by the migrant worker. The employer's contract with the recruitment agent must specify who is responsible for the reimbursement of any fees incorrectly paid by the worker, including by sub-agents.

9. It is the employer's responsibility to verify that the recruitment agency is complying with their contractual terms including their use, and responsibility for the actions of any sub-agents; this can be through audits, worker interviews and confidential worker hotlines.

10. Employers must give recruitment agents realistic time for recruitment processes to enable them to follow the correct procedure.
11. Employers must allow recruitment agencies to check that their site and contracts are compliant with information provided in the recruitment process.

12. Migrant workers already in the country of employment must have the same opportunities for employment as migrant workers recruited across borders.

B. ORIENTATION AND TRAINING

1. On arrival migrant workers orientation must include information on their rights and obligations, relevant local laws and employment registration procedures, healthcare provisions and providers, risks around local infectious diseases (including STDs), employer rules and regulations, disciplinary systems, communication systems, and grievance processes. Employers must also outline how they will support workers in the event of

accidents, repatriation and any issues with local authorities.

2. For illiterate employees, the information must be explained to them in their own language by a translator who is independent of the recruitment agency.
3. Employers must ensure migrant workers are introduced to worker committee representatives and managers who speak their language.

C. EMPLOYMENT TERMS

1. Employers are responsible for ensuring all applicants have the right to work and required paperwork before departure.
2. Employment contracts must be in worker's own language. It is the employer's responsibility to ensure migrant workers understand and freely accept terms and conditions before contracts are signed.
3. Migrant workers must receive a copy of their signed contract which specifies the employer's policy on recruitment fees and recruitment costs, and provisions for illness and repatriation.
4. Worker's understanding of contracts must be checked pre-departure and on arrival to ensure consistency. Any inconsistency between contracts provided by a recruitment agent and

employer must be addressed immediately with remedial action where required.

5. Unless specified in local law, no migrant workers must have to pay deposits or security payments as a condition to their employment.

D. WORKING HOURS

1. Migrant workers must not be forced to work overtime. There must be no threat of penalty including involuntary repatriation.

E. PAY

1. Employers must help migrant workers enrol in obligatory state social security and taxation systems, and if needed, to set up a bank account of their choice. Migrant worker's wages must be paid into an account in their own name.

2. Migrant workers must receive itemised payslips in their own language. Where this is not possible the employer must display translations of itemised payslips on worker notice boards.

3. No deductions must be made from pay including forced saving schemes, deposits, and 'runaway insurance'.

F. BENEFITS

1. Migrant workers must be able to choose whether to live in employer provided housing or to make their own living arrangements. Employers must assist workers who require support finding suitable accommodation.

2. If the employer helps to arrange accommodation, workers must have options (including transport) clearly explained in their own language. Migrant workers must not be denied freedom of movement.

3. Migrant workers living in employer provided on-site accommodation must have access to recreation facilities. Employers should consider offering language training to encourage integration along with access to the internet and Wi-Fi.

4. Employers must take account of migrant workers' dietary needs related to health or religious requirements or allow them to provide their own food on site.

5. Migrant workers must be free to return home during paid leave without fear of reprisal or sanction.

G. WORKER REPRESENTATION

1. Migrant workers must have the right to choose whether to join a trade union. Where this is prohibited by law, the employer must ensure migrant workers are fairly represented on their worker committee.

2. Independent translation facilities must be made available where required to allow migrant workers to communicate confidentially and collectively within the worker committee. Worker committee meeting minutes must be made available in all worker's languages.

3. Employers must not interfere with migrant workers' approaches to worker committee representatives for support.

H. HEALTH AND SAFETY

1. Employers must ensure migrant workers receive health and safety training in a language they understand before they start work.

2. Operational instructions, safety notices and labelling of hazardous materials must be translated into relevant languages or put in pictorial form.

3. Employers are responsible for ensuring migrant workers understand the healthcare available to them on and off site.

I. WORKER PROTECTION AND GRIEVANCE PROCEDURES

1. Employers must have a migrant worker policy which complies with international human rights law, signed by senior management.

2. Line managers and supervisors must be trained to recognise the additional provisions required when working with migrant workers so that they are not discriminated against. For example, provision must be made to ensure communication on the factory floor is in worker's languages.

3. Employers must not retain worker's identity documents; safe keeping of documentation or possessions by the employer, at the request of any employee is not an acceptable alternative. All workers must be offered safe lockable storage for their documents that they can access freely.

4. A document retention policy must be signed by workers explaining the process when identity documents are required by the employer for permit processing.



5. Where employers identify migrant workers that have become undocumented, the employer must explore ways to bring workers back to regular status.

6. Employers are responsible for ensuring migrant workers understand the grievance procedures and access to remedy available to them. Access to judicial remedy must not be denied.

3. Where dismissal occurs, there must be a suspension period to enable independent investigation without risk of deportation. While complaints are being investigated workers have the right to remain employed and remain in their accommodation.

4. Freedom to change employment must be respected and legal requirements followed.

5. At the end of a contract all migrant workers must be paid outstanding wages and any other benefits or savings accrued in full before they leave.

J. END OF EMPLOYMENT

1. The employer must bear the full costs of repatriation for migrant workers at their end of their contract or in exceptional circumstances (e.g. medical emergency, political unrest placing workers in danger). Employers must honour contracts with migrant workers and not use false reasons for terminating a worker's contract prematurely to avoid the costs associated with repatriation.

2. Where migrant workers terminate their contract after their probation, but before contract end, there must be no penalty and the usual assistance in repatriation must be provided unless the worker is in clear breach of contract.

6. In cases of retrenchment, the employer must provide fair compensation and cover the costs of repatriation.



SUPPLIER PARTNER REQUIREMENTS: CHILD LABOUR AND YOUNG WORKERS

SUPPLIER PARTNER REQUIREMENTS: CHILD LABOUR AND YOUNG WORKERS

The World Wise Foods Group recognises that every child has the right to be protected from harm, the right to an education and should attend school before they start working. The World Wise Foods Group takes responsibility to ensure the protection and welfare of any child or young person identified in our supply chains.

The World Wise Foods Group recognises that child labour is complex, particularly at farm level; visibility can be low and it can be difficult to identify occasional work to assist the family versus child labour. The International Labour Organisation has identified that the majority of child labourers work in agriculture and that low household income and pressure from families to work contribute to child labour. Once in work, children are often put in low skilled positions, are vulnerable to abuse by supervisors and are very dependent on employers if they have left home.

While 18 is the usual minimum employment age for our tier one supplier partners, we recognise that additional efforts are required to verify this, and to ensure child labour does not take place in the lower tiers of our supply chain.

The World Wise Foods Group recognises the binding international standards⁵ that define child labour and expect our supplier partners to uphold these standards by meeting the requirements in this policy. We also expect tier one supplier partners to share this, or their own policy, with their suppliers and to identify and verify areas of risk in our shared supply chain.

The World Wise Foods Group expects our supplier partners to comply with the following practices:

- Employers shall employ workers aged over 18, or legal working age. No workers must be employed under the age of 15 or within the age of compulsory school age.
- Employers are responsible for verifying the age of all their workers and must be trained to identify false documents.
- If child labour is found it must be reported to the World Wise Foods Group immediately; The World Wise Foods Group will support supplier partners and work with them on a remediation process. The World Wise

Foods Group is prepared to terminate relationships with supplier partners if they deliberately fail to respect this policy or refuse to undertake an agreed remediation process.

- If child labour is found, the protection of the child and their interest comes first. They must not be dismissed; a remediation process must be followed, and solution sought, in collaboration with their family, that enables access to education. The child must not work but must receive pay and accommodation to ensure work elsewhere is not sought. A full remediation process must be agreed with the World Wise Foods Group before it is implemented.
- Violence against any worker, including children or young workers is a serious offence and must result in dismissal.
- Young workers under the age of 18 must not be employed to work at night, or in conditions which compromise their health, safety or moral integrity, and/or which harm their physical, mental, moral or social development.

Employers are responsible for identifying such conditions through risk assessments.

- Part-time work must not interfere with a child's education.
- The World Wise Foods Group supports formal work-based training and apprenticeship programmes that enable young workers to learn new skills. These must be properly registered and supervised and not used as a form of forced or low-cost labour.
- Children (under the age of 15) are not allowed onto production sites or in working areas on employer owned plantations. The only exception to this is for school educational events.

⁵ ILO's 'Worst Form of Child Labour Convention' 182, ILO Convention 138 and the ETI Base Code.



SUPPLIER PARTNER REQUIREMENTS: WOMEN IN OUR SUPPLY CHAINS

SUPPLIER PARTNER REQUIREMENTS: WOMEN IN OUR SUPPLY CHAINS

The World Wise Foods Group recognises that gender diversity helps businesses perform better; holding back half the population from achieving their full potential at work does not make good business sense. We support the [UN Women's Empowerment Principles](#) which focus on empowering women in the workplace and community.

Women are an essential part of global supply chains and make a significant contribution to our business. While globalisation has led to increasing employment opportunities, women hold a greater share of informal and seasonal employment and are more likely to be found in low skilled, low waged jobs. We recognise that women are a vulnerable group in our supply chains, and that ensuring the inclusion of their skills, experiences and potential requires intentional actions.

The World Wise Foods Group recognises that our supplier partners have a unique opportunity to address the constraints that affect women in the workplace by ensuring they are gender sensitive employers – from recruitment, promotion, skills development and working conditions through to support for work life balance.

As well as complying with the practices outlined under workplace equality in this policy, we

expect our supplier partners to comply with the following practices in order to ensure workplace equality for women:

A. EMPLOYMENT TERMS

1. Employers must seek to understand and accommodate the specific factors that affect women's attendance and retention within reason – for example primary care responsibility for dependents.

B. ACCESS TO TRAINING

1. Employers must ensure any education and training is provided at a time and location that is accessible to women.

C. WORKING HOURS, PAY AND BENEFITS

1. Women workers' contracts must be equal to other workers in the same role (pay, benefits, job security, length of contract and terms and conditions).
2. All women workers must have full control of their wages. Wages must be paid into a bank

account of their choice in their own name.

D. ACCESS TO PROMOTION

1. Women workers must have the equal access to promotion. Employers must be self-aware regarding promotion practices that are intentionally, or unintentionally excluding women. For example, women's job mobility must not be restricted by the segregation of "male" and "female" jobs.

E. WORKER COMMUNICATION

1. Women workers must be proportionally represented on worker committees.
2. Supervisors must be trained and aware of the power dynamics between male and female workers. Expectations of appropriate behaviour and disciplinary actions for inappropriate behaviour must be included at worker orientation and in all worker's contracts.
3. Employers must proactively seek feedback from women workers either by requesting auditors to interview women workers individually or in groups, or through analysing women workers' perspectives in their worker surveys.

F. HEALTH AND SAFETY

1. Employers must take into consideration the specific needs of women workers on site. Close access to sanitary facilities, provision of sanitary bins, re-assignment and/or additional rest breaks for pregnant workers, breastfeeding rooms, maternity leave (as required by local law as a minimum) and access to women only areas for religious worship.

G. WORKER PROTECTION AND GRIEVANCE PROCEDURES

1. Employers must consider any extra actions that are needed to ensure women workers are safe, and feel safe whether it be on site, at on site accommodation, at (provided or recommended) offsite accommodation or through transport provision (particularly after dark).
2. Employers must have a procedure in place when women workers raise grievances relating to sexual harassment, intimidation or violence, which include options for protection (e.g. alternative accommodation) of workers during investigations. A commitment to remediation must be articulated in the policy, as must disciplinary actions for perpetrators.

REFERENCES

REFERENCES:



[ETI Base Code](#)

[Dhaka Principles](#)

[UN Guiding Principles on Business and Human Rights](#) - they are also explained in [this short video](#)

[Translations of UN Guiding Principles of Business and Human Rights](#)

[UN Women's Empowerment Principles](#)

ILO's ['Worst Form of Child Labour Convention' 182](#) and [ILO Convention 138](#)

[World Wise Foods Responsible Sourcing Code of Practice](#)

SUPPLIER PARTNER CHECKLIST

Supplier partner requirement	Compliant ✓/✗	Agreed next steps:
Supplier partner responsibility: minimum standards		
Minimum standards		
Supplier partner responsibility: responsible, responsive employers		
Responsible, responsive employers		
Supplier partner requirements: workplace equality		
A. Recruitment		
1		
2		
3		
B. Orientation and training		
1		
2		
C. Employment terms		
1		
2		
3		
4		
5		
6		

Supplier partner requirement	Compliant ✓/✗	Agreed next steps:
D. Working hours		
1		
2		
3		
E. Pay		
1		
2		
3		
4		
F. Benefits		
1		
2		
3		
4		
5		
6		
7		
8		
9		
G. Worker representation		
1		
2		
3		
4		

Supplier partner requirement	Compliant ✓/✗	Agreed next steps:
H. Health and safety		
1		
2		
3		
I. Worker protection and grievance procedures		
1		
2		
3		
4		
5		
J. End of employment		
1		
2		
3		
4		
Supplier partner requirements: migrant workers		
A. Recruitment		
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		

Supplier partner requirement	Compliant ✓/✗	Agreed next steps:
11		
12		
B. Orientation and training		
1		
2		
3		
C. Employment terms		
1		
2		
3		
4		
5		
D. Working hours		
1		
E. Pay		
1		
2		
3		
F. Benefits		
1		
2		
3		
4		
5		
G. Worker representation		
1		
2		
3		

Supplier partner requirement	Compliant ✓/✗	Agreed next steps:
H. Health and safety		
1		
2		
3		
I. Worker protection and grievance procedures		
1		
2		
3		
4		
5		
6		
J. End of employment		
1		
2		
3		
4		
5		
6		
Supplier partner requirements: child labour and young workers		
Child labour and young workers		

Supplier partner requirement	Compliant ✓/✗	Agreed next steps:
Supplier partner requirements: women in our supply chains		
A. Employment terms		
1		
B. Access to training		
1		
C. Working hours pay and benefits		
1		
2		
D. Access to promotion		
1		
E. Worker communication		
1		
2		
3		
F. Health and safety		
1		
G. Worker protection and grievance procedures		
1		
2		

All information correct at time of publication

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World Wise Foods Group

Responsible Sourcing Code of Practice for Supplier Partners

A. Introduction:

The World Wise Foods Group is committed to ensuring that all of our products are ethically and sustainably sourced. Continuous improvement towards ethical trade and sustainable sourcing best practice are at the heart of how we do business. To achieve this, we are committed to monitoring our suppliers and partners, supporting them to achieve standards and continuously improve.

B. Who this code applies to:

This document captures the minimum standards expected of all tier one¹ supplier partners and co-pack partners in the World Wise Foods Group supply chains. These standards reflect best industry practice and are supported by [UN conventions](#) and [ILO standards](#).

It is the supplier partners responsibility to meet these standards and to be able to demonstrate they have done so.

The most senior staff member at each supplier partner is invited to sign and return "Appendix One: Acknowledgement of Code of Conduct" of this document as an acknowledgement of their commitment to meet the expectations of this Code of Practice.

For new supplier partners, this document needs to be returned before supply can commence.

C. How we work with suppliers and partners:

The World Wise Foods group believes in working collaboratively with supplier partners; in this context we ask our supplier partners to be open and honest with us about their ethical and sustainable sourcing practices so that we can support them in achieving best practice.

The World Wise Foods Group will support any supplier partner who is willing to improve; we do however have zero tolerance if supplier partners intentionally conceal non-compliance with this code of practice, or if they are unwilling to improve when issues have been identified. In these situations, we may need to review our trading relationship.

Where a supplier partner is not currently meeting all of the Code of Practice requirements, it is their responsibility to proactively inform the World Wise Foods Group Ethical Trade Team who will work with them constructively to put a plan in place for continuous improvement with support from World Wise Foods Group, or a third party.

D. Supplier and Partner Requirements

¹ "Tier One" are supplier partners that the World Wise Foods Group purchases products from directly. "Tier Two" are those companies which provide product ingredients to "Tier One".



Supplier partners should have a named person responsible for managing each of the areas below. By signing this policy supplier partners are confirming they, and their sub-contractors², are meeting the following requirements or are open to continuous improvement to meet them;

- **Local laws and regulations:** Supplier partners are responsible for maintaining up to date knowledge and compliance to relevant local regulations including those on employment, health and safety, and the environment.
- **World Wise Foods Human Rights Policy³:** Supplier partners are expected to work towards achieving the expectations set out in this policy which focuses on worker equality and the additional provisions required for vulnerable workers (migrant workers, women, child labour and young workers). This policy reflects the [Ethical Trade Initiative \(ETI\) base code⁴](#) which is recognised by many of our customers. This policy is written for processing sites – the principles outlined are also to be applied in farm, and vessel level contexts.
- **Traceability:** Supplier partners are expected to be able to trace all raw materials back to source farm or fishery⁵ and to be willing to share this information with the World Wise Foods Group and customers to enable transparency on human rights, product integrity and environmental impacts throughout the supply chain.
- **The Environment:** Supplier partners are expected to comply with all relevant laws and regulations regarding the protection and preservation of the environment and to ensure all necessary permits are in place.

Supplier partners should be aware of the environmental risks created by their operations both on their site and to the wider community. Supplier partners are expected to complete full assessments of their environmental impact. We recommend that supplier partners put measures in place to monitor carbon

² Supplier partners are responsible for ensuring compliance to this code of practice by any sub-contractors providing them with labour (e.g. security guards, seasonal workers), or services for workers (e.g. accommodation). This can be achieved through internal audits – some customers may require third party audits for any providers of labour. Guidance on management of labour providers and worker accommodation standards are available from World Wise Foods.

³ See the full policy [here](#). A Thai translation can be shared on request.

⁴ Working Hours – we recognise that in the geographic context where many of our supplier partners work ETI base code working hours are a challenge to meet. We expect all supplier partners to comply with local law on legal working hours and overtime hours. Where these currently exceed ETI standard 60 hours a week we expect supplier partners to put in additional provisions to protect workers. All overtime must be voluntary in principle (stated as voluntary in contracts) and in practice (enough notice given to workers that there is no pressure to accept overtime hours). Rest days (1 day in 7 days, or 2 days in 14 days) must be observed and systems put in place to prevent workers from missing rest days. In addition, on request, we expect supplier partners to be able to provide data that identifies any correlation between long shifts and trends in accident rates, productivity and product quality. Some customers set specific working hours limits (e.g. 72 hours), we will inform you if this is the case.

⁵ For supplier partners producing recipe products with multiple ingredients the requirement to trace back to source farm only applies if requested by customers and for World Wise Foods group priority raw materials (coconut, pineapple, mango, papaya, jackfruit, tomato, peanut, cashew, sugar, rice, dried herbs/spices, soya, fish derivatives, tuna, salmon)

emissions, food waste and water use in order to identify potential areas for improvement and efficiency savings⁶. Putting measures in place will also demonstrate to customers that requirements in these areas are being met.

- **Waste Management:** Supplier partners are expected to minimise waste created by their operations. Recycling should be promoted. Food waste suitable for human consumption should be utilised as food and not disposed of by other means.
 - **Energy and Water:** Supplier partners are expected to ensure energy usage is as efficient as possible. Supplier partners are encouraged to explore renewable energy options.
 - **Hazardous substances:** Supplier partners are expected to manage hazardous substances movement, storage and disposal as required by local law.
 - **Product Packaging:** Supplier partners are expected to work proactively with the World Wise Foods Group to identify product packaging that is recyclable in its destination country. This includes moving towards FSC certified paper-based products and using recycled materials within packaging where possible.
 - **Agricultural Production:** Supplier partners who own their own agricultural production sites are expected to minimise use of pesticides and herbicides.
- **Health and Safety (H&S):** Supplier partners are expected to proactively put measures in place that protect all workers at their site and at supplier provided, or recommended, worker accommodation.

Supplier partners are expected to;

- Ensure all workers receive and understand training on H&S including their rights, responsibilities and the implications of wilfully putting themselves, or others at risk.
- Ensure workers doing repetitive or physically demanding tasks receive specific training for their roles.
- Regularly assess for H&S risks, including the specific risks of vulnerable groups, the management of chemical and biological hazards (including allergens) and dangerous machinery.
- Include worker feedback in H&S assessments through worker membership of an H&S committee, worker committee feedback or worker surveys.
- Provide protective equipment and clothing to workers as required and ensure this is used.
- Manage, track and report on near misses, injury rates and illness, and ensure all workers have access to on and off-site healthcare and health assessments as required by local law.
- Be prepared for emergency situations through regular drills on site and in worker accommodation (including at night).

⁶ Many retailers are making environmental commitments to become carbon neutral. To achieve this the companies in their supply chains will need to be measuring and reducing their carbon footprints. Measuring carbon footprint can drive efficiency savings in resource use (water, energy etc).

- **Business integrity:** The World Wise Food Group maintains the highest standards of business integrity and expects its supplier partners to also maintain these standards. No improper advantage should be sought including payment of bribes to secure contracts or influence audits.

E. Ensuring compliance:

World Wise Foods expects supplier partners to complete audits of the type⁷, and frequency determined by customers. Where no audits are required by customers, the World Wise Foods Group expects audits or an agreed equivalent assessment⁸ to be completed every two years and for these to be semi-announced or un-announced. Where the primary raw material is seasonal, audits must take place during peak season unless agreed in advance⁹. The World Wise Foods Group and customers reserve the right to arrange an unannounced audit at a supplier partner when there is cause for concern.

For new supplier partners, all business critical, or critical non-conformances (NC's) must be addressed before supply commences.

The World Wise Foods Group will seek to support supplier partners to reduce the audit burden where possible. If you need information on your audit requirements, please contact ethicaltrade@worldwisefoods.co.uk.

Supplier partners are expected to:

- Register as a member on SEDEX¹⁰
- Inform World Wise Foods when an audit window is booked.
- Inform World Wise Foods of the results of the audit by sharing the SMETA corrective action plan left by the auditor within 24 hours
- Support World Wise Foods communicating corrective actions to customers. .
- Agree a timeline for closing off NC's and upload corrective actions and evidence onto SEDEX.
- Follow up with the auditor to ensure they upload SMETA audits on SEDEX within 10 days.
- Ensure SEDEX SAQ is updated (and finalised) annually and completed to 100%.

For supplier partners with BSCI audits the same process applies except corrective actions will be agreed via email. BSCI reports must be saved on the SEDEX platform.

In addition to audits, supplier partners are expected to accommodate audits and visits from customers ethical trade teams and World Wise Foods site assessments to be conducted by a member of the Ethical Trade Team against our human rights [policy](#). Any World Wise Foods ethical assessment (this is not an audit) will result in an ethical action plan to be agreed with the supplier partner. Action plans focus on moving towards best industry practice; this may go beyond audit requirements and local regulations. World Wise Foods will support supplier partners directly, or through third parties to continuously improve through these action plans.

⁷ Most customers require either SMETA, BSCI or SA8000.

⁸ This could be submission of an audit completed for non-World Wise Foods Group customers, remote verification of data in the SEDEX SAQ or a visit from the World Wise Foods group Ethical Trade Team.

⁹ Recipe products are not seasonal.

¹⁰ Customers may also request that 2nd Tier suppliers (e.g. packaging suppliers) are also registered on SEDEX

The World Wise Foods Group appreciates the openness and engagement of supplier partners throughout these assessment processes. This policy reflects minimum standards and we believe everything in this policy is achievable by our supplier partners.

The combination of the information received and action plan implementation, contributes to an overall supplier partner score which is updated quarterly and shared across the World Wise Foods Group; this contributes to supply decisions.

Appendix 1: Acknowledgement of Code of Conduct

New suppliers need to complete and return this section before trade commences. By signing this agreement, suppliers partners are making a commitment that they are fully compliant to the code of conduct, or willing to be open with the World Wise Foods Group about areas of non-compliance and to work together on continuous improvement.

This acknowledgement can be signed by the Managing Director, or most senior equivalent person at the supplier site. The policy needs to be shared with all relevant staff responsible for Health and Safety, Environmental Management and Human Resources.

Please return a signed copy to your key contact or to ethicaltrade@worldwisefoods.co.uk

I holding the most senior position at the supplier partner site named..... at the address

.....
..... acknowledge the content and meaning of the the World Wise Foods Group Responsible Sourcing Code of Practice and commit to ensuring continuous improvement towards full compliance of my site against these standards.

Name.....

Position Held.....

Signed..... Date..... For further information contact the Ethical Trade Team (ethicaltrade@worldwisefoods.co.uk)