

## Policy: Responsible Sourcing Policy

Document No. Q100-44

Rev. 1

Statement from the CEO

We recognise that we have a duty to conduct business responsibly in relation to human rights and the environment. This policy outlines our current approach which is risk-based and will therefore evolve over time. We expect our suppliers and representatives to live up to the standards and frameworks laid out below and we will provide support and guidance to them as required.

### Principal areas of focus

As a consequence of our risk assessment, we have identified the following principal areas of focus in the context of this Policy.

#### ***Human Rights***

The Jordans & Ryvita Company recognises its responsibility to respect the human rights of those who work in our supply chain. Issues negatively affecting their rights and working conditions are of serious concern to us. For the purposes of this Policy we refer to the [ABF Group Code of Conduct](#) as the scope of reference to define those rights in focus. This Code is based on the [UN's International Labour Organization's Core Conventions](#) and its [Declaration on Fundamental Principles and Rights at Work](#).

To guide implementation, we refer to the OECD's Due Diligence Guidelines. We are an active member of [Sedex](#) and expect all suppliers within the scope of this Policy to provide relevant information through this platform. We identify potential areas of risk in our supply chain using the risk assessment tools on the Sedex platform, alongside other sources of information to prioritise areas of focus. Should we find evidence of non-conformance to this Policy, we will act to require our suppliers to address this and use any leverage we can bring to bear to prevent or mitigate the harm, providing remedy where possible.

#### ***Deforestation and biodiversity***

The Jordans & Ryvita Company recognises that deforestation and the loss of High Conservation Value Areas (HCVAs) presents real challenges both now and in the future. We also recognise the damaging impact of biodiversity loss. The Jordans & Ryvita Company understands that meaningful change in the way that organisations source raw materials is required to tackle these issues. To that end, The Jordans & Ryvita Company supports the principles of the New York Declaration on Forests and of Sustainable Development Goal (SDG) 15 (Life on Land). We are committed to responsible sourcing of our key commodities, and Schedule 1 below outlines areas of risk in this context and where we are working proactively with the aim of driving positive change.

#### **Animal Welfare:**

The Jordans & Ryvita Company produces foods primarily derived from ingredients of plant origin, with the exception of a small quantity of dairy products. We believe in the importance of high animal health and welfare standards within agricultural systems and we support [ABF's commitment](#) to source ingredients derived from animals in alignment with the internationally recognised [Five Freedoms](#), i.e., freedom from hunger, thirst and malnutrition, physical and thermal discomfort, pain, injury and disease, fear and distress, and freedom to express normal patterns of behaviour.

### Policy Scope and Implementation

The Jordans & Ryvita Company aims to work collaboratively with suppliers to assess and manage risk in the context of this Policy. Our business prioritises supply chain intervention based upon a combination of factors, as outlined below:

1. The scope of this Policy includes our principal raw material, packaging finished goods suppliers, and services suppliers (including security, cleaning, workwear, temporary labour and logistics providers).
2. All in-scope supplier sites agree to provide relevant data about their operations, including through Sedex. This data, together with any associated ethical audit reports, allows us to take a risk-based approach to the identification and management of issues.
3. For the purposes of assessing salient ethical risk associated with in-scope suppliers, The Jordans & Ryvita Company undertakes monthly reviews of those suppliers using appropriate independent risk assessment tools on the Sedex platform, which combine inherent country and sector risks together with supplier specific information to highlight potential issues.

As a result of our risk analysis, suppliers may be designated as being 'High Risk' and will be prioritised for enhanced assessment and review, through a combination of more frequent ethical audits and additional supply chain monitoring.

In addition, The Jordans & Ryvita Company assesses structural commodity risks, for example those related to human rights, deforestation or agricultural practice, on the basis of a combination of information in the public domain and information received from stakeholder engagement, reports from governmental and civil society organisations, as well as other forms of business intelligence. Commodities that are deemed to present a significant risk in the context of this Policy will be documented in Schedule 1 of this Policy as areas of focus and subject to annual review. Schedule 1 also documents where we are sourcing more sustainable alternatives.

### **Grievance Mechanisms and Remediation**

We encourage our own employees to report any breaches of human rights via our [internal Speak-Up procedure](#).

Workers in our supply chain are encouraged to report any grievances via the People In Touch (Link) Platform or other grievance disclosure mechanisms agreed within specific supply chains.

An important aspect of responsible supply chain management is that workers whose rights have been negatively impacted should have access to an effective remedy. If The Jordans & Ryvita Company identifies any breaches of the core principles of this Policy, we will investigate and on a case-by-case basis seek to use what leverage we may have over our supply chain partners to provide remedy where possible.

### **Policy Governance**

This Policy must be formally approved by the Managing Director of The Jordans & Ryvita Company.

Our Finance Director is accountable to the Board of Directors for ensuring business compliance with this policy.

An annual review of the content and implementation of this Policy shall be undertaken and presented to the Board, including:


- Any relevant learnings from our ongoing assessment and monitoring.
- An assessment of management data relating to all active suppliers.

- An assessment of any new information (such as information from third party organisations). pertaining to potential risks within the supply chain.
- Recommendations on additional areas of focus.

### Schedule 1

Our current areas of focus include:

- 1. Palm oil.** We will source 100% of palm oil used as a manufacturing ingredient sustainably and responsibly from certified RSPO segregated third-parties. The segregation supply chain model (SG) assures that RSPO certified oil palm products delivered to the end user comes only from RSPO certified sources.
- 2. Soya.** While we are not major users of soya, we require all our suppliers to demonstrate relevant responsible sourcing policies aligned to OECD Guidelines. By preference, the soya that is used in our products is sourced from the EU.
- 3. Cocoa.** While we are not major users of cocoa, we require all our suppliers to demonstrate relevant responsible sourcing policies aligned to OECD Guidelines. This will be reviewed as part of our ongoing procurement processes.
- 4. Vine fruit and hazelnuts.** Our business is a long-standing supporter of the Fair Labor Association 'Harvesting the Future' programme, alongside our supply chain partners, to address risks.

Date of Issue:	Next review:	Signature of Managing Director
September 2023	September 2024	

**Document History**

Version	Author/Owner	Date	<b>Description of Version</b> <i>Main or important changes since previous version</i>
1			New Document