

POL 2.1 - RESPONSIBLE SOURCING POLICY

Westmill Foods, as a leading UK food producer is committed to responsibly manufacturing and sourcing products of the highest quality and safety. We source from many countries around the world, in order to meet our customer’s requirements to be supplied with authentic ethnic foods. Our sourcing activity is always guided by the principles in the ABF Code of Conduct.

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

Westmill 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

Westmill 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. Westmill understands that meaningful change in the way that organisations source raw materials is required to tackle these issues. To that end, Westmill 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.

Westmill produces foods primarily derived from ingredients of plant origin, with the exception of a small quantity of dairy products, eggs and processed meat. 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.

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Animal Welfare

Westmill produces foods primarily derived from ingredients of plant origin, with the exception of a small quantity of dairy products and eggs and processed meat. We believe in the importance of high animal health and welfare standards within agricultural systems. Our approach to animal health and welfare is governed at a minimum by ABF’s Animal Welfare Policy and as set-out in that policy, our sourcing of ingredients derived from animals is guided by 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

Westmill 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, Westmill 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, Westmill 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.

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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 available grievance mechanisms.

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 Westmill 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 Westmill.

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 third-parties and from RSPO segregated third-parties where possible. 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.** We require all our suppliers to demonstrate relevant responsible sourcing policies aligned to OECD Guidelines. Where appropriate, the soya that is used in our products is sourced from Canada. Where relevant, Westmill are taking steps to source soya in compliance with emerging deforestation standards and regulations, including the European Deforestation Regulation, across its global supply chains.

3. **Paper & Board.** This will be sourced from suppliers that meet the requirements provided by the Forestry Stewardship Council (FSC), and where this is not available, the Programme for the Endorsement of Forest Certification (PEFC). **99% of our Paper & Board is either FSC certified or from other sustainable practices is currently sourced this way and we will make this 100% by 2025.** For FSC products, we are working with our packaging suppliers to ensure that recycled content is included in the paper and board we buy wherever possible. All virgin paper and board



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materials certified or uncertified will be sourced from sustainably managed temperate forests, with chain of custody proof provided by the supplier.

4. **Cocoa.** While we are not major users of cocoa, we require all our suppliers to demonstrate relevant responsible sourcing policies aligned to [OECD's Due Diligence Guidelines](#). This will be reviewed as part of our ongoing procurement processes.
5. **Eggs.** Our business has achieved our commitment to sourcing 100% Cage Free Eggs by 2025.
6. **Rice.** Our business is working with key partners and suppliers to promote the standards and targets of the Sustainable Rice Platform, a multi-stakeholder partnership set up by the United Nations Environment Programme (UNEP).
7. **Spices.** Our business is a member of the Sustainable Spice Initiative and in accordance with this, is committed to sourcing 25% of our top three spices from certified sources by 2025, increasing to 50% by 2030.

DOCUMENT SIGN-OFF

	Document Prepared By: -	Document Approved By: -
Position:	Sustainability Lead	Managing Director
Name:	Nia Garry	Nathan Herrmann
Signature:		
Date:	23/01/2024	23/01/2024

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