



SUPPLIER CODE OF CONDUCT POLICY

Introduction

Meadow is dedicated to operating and developing the business in a sustainable and responsible manner.

Meadow strives to source and produce products in the most sustainable way while ensuring high quality, safe products throughout our supply chain, and we recognise that our suppliers have a major impact on our sustainability performance and brand reputation.

The purpose of this document is to outline the Meadow way of working, which we apply to responsible sourcing through our supply chain.

We source various types of materials in the form of ingredients, packaging materials, non-product related materials and services, and apply the principal of responsible sourcing to all our external suppliers through the use of our 'Supplier Code of Conduct Policy'.

General Principles

Meadow expects the suppliers we work with to acknowledge and accept their responsibility by agreeing with this policy. We also expect our suppliers to use all reasonable efforts to ensure their agents, sub-contractors, and suppliers also fulfil the requirements set out in this document.

All product related and selected non-product related category suppliers are required to go through a process to become a Meadow preferred supplier. This approval process includes assessments and audits of suppliers against expectations in relation to food safety, product quality, and responsible sourcing principles including environmental, social, and human rights aspects.

Legal Compliance

Suppliers must always comply with, or exceed, the requirements of all applicable laws, rules, and regulations in the countries in which they conduct business.

Management of Risks

We expect that our suppliers adopt a due diligence approach by conducting risk assessments to identify the potential risks related to business ethics, human and labour rights, health, safety, and environment, and by establishing appropriate systems to identify, prevent, mitigate, or manage the risks, and ensure compliance. Suppliers shall maintain documentation to demonstrate compliance.

Meadow will work collaboratively with suppliers to ensure compliance with its 'Supplier Code of Conduct Policy' which sets out the minimum standards expected of all our suppliers.





SUPPLIER CODE OF CONDUCT POLICY

This policy is designed to extend our commitment to ESG (Environmental, Social & Governance) across a diverse and extensive supplier base, whilst recognising that our suppliers operate in many different cultural environments.

Meadow ESG Key Commitments

- To adhere to ethical, social, and minimum labour standards and comply as a minimum with the relevant national legal standards or industry benchmark standards, whichever are the higher.
- To commit to the environment and recognise the need to minimise environmental impact.
- To implement management and monitoring systems to monitor performance against commitments and, where required, to implement corrective actions.
- To conduct business with honesty and integrity and to implement global zero tolerance policies towards bribery and corruption and modern-day slavery.

Ethical, Social & Human Rights Standards

Meadow recognises that its commercial success and corporate activities have potential consequences for its stakeholders, mainly those individuals or groups who are affected directly or indirectly by Meadow's activities and achievements.

As a socially responsible business, Meadow expects suppliers to:

- Ensure that all products manufactured and sourced by the supplier are produced under working conditions that are safe and hygienic.
- Ensure that all workers are treated with full consideration of their basic human rights.
- Act in an ethical and transparent manner and as a minimum comply with all applicable laws of countries in which they operate.
- Support the principles set out in the UN Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, ETI Base Code and the Core conventions of the International Labour Organisation.

Meadow will work collaboratively with suppliers in support of the implementation of and the adherence to this policy, which may include joint audits and site visits to assess performance against this policy.

Minimum Labour Standards

- No forced, bonded, or involuntary labour shall be used.
- All employment shall be freely chosen.
- Employees shall not be required to lodge deposits or identity papers.
- Employees shall be free to leave after reasonable notice.

Minimum Age of Employment

Unless the applicable local minimum age for work or mandatory schooling specifies a higher age, or the International Labour Organisation (ILO) exemption for developing countries applies, or applicable national regulation enacted in accordance with ILO convention applies, suppliers shall not recruit or employ children under 15 years of age.

- Children and young persons under the age of 18 shall not be employed at night or be required to undertake potentially hazardous activities potentially injurious to their health and development



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Trade Union

Suppliers shall allow employees the freedom to join a union (or collective bargaining group acting for them) or allow them to decline if they choose to.

- Suppliers shall comply with all applicable laws on freedom of association and collective bargaining.

Working Conditions

- Suppliers shall take all appropriate measures to prevent accidents and minimise potential hazards.
- Employees shall receive regular health and safety training.
- Employees shall have unrestricted access to toilet facilities and drinking water.
- Suppliers shall have a published health and safety policy.

Working Hours and Remuneration

- Employee pay rates shall comply with national legal standards.
- Employees shall not be forced to work more than 48 hours per week on a regular basis and shall be provided with at least 1 day off per week. All overtime shall be voluntary.
- Employees shall be given clarity as to their terms and conditions of employment which shall detail the respective obligations of the employee and employer under the employment relationship, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment.
- No deductions shall be made from wages as a disciplinary measure.
- Labour-only contracting, sub-contracting and fixed term contracts shall not be used to avoid legal obligations under labour or social security laws.

Discrimination

- There shall be no discrimination in pay, hiring, compensation, access to training, promotion, termination of employment or retirement on the grounds of race, nationality, religion, age, disability, gender, marital status, sexual orientation, UN membership or political affiliation.
- Opportunities for personal and career development shall be equally available to all employees.

No Harassment, Threats, Abuse, or Intimidation

- Suppliers shall not use or permit the use of harassment, threats, abuse, or intimidation.
- Without limitation, physical, verbal, and sexual threats, abuse, harassment, and intimidation are expressly prohibited.

Modern Slavery

Modern Slavery is a criminal offence, and a violation of fundamental human rights. It can take various forms, all of which deprive a person's liberty to exploit them for personal or commercial gain.

Meadow has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and are committed to implementing and enforcing effective systems and controls to ensure modern slavery does not take place anywhere in our own business or in any of our supply chains.

Meadow is committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligation under the Modern Slavery Act 2015.

We expect the same high standards outlined above from all our suppliers, regardless of whether they are required to produce a transparency statement themselves.



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Meadow suppliers are expected to:

- Ensure they are familiar with the modern-day slavery act and the requirements therein.
- Take steps to identify, understand and manage risks of modern slavery in their own operations and in their supply chains.
- Demand the same high standards outlined in this policy from their own suppliers
- Notify Meadow immediately if they become aware of or suspect any modern slavery within their operations or supply chains.

Global Zero Tolerance Policy Towards Bribery and Corruption

Meadow suppliers shall:

- Comply with all applicable anti-bribery laws for their territory including, but not limited to, all statutes, statutory instruments, byelaws, orders, directives, treaties, decrees, and laws (including any common law, judgement, demand, order, or decision of any court, regulator, or tribunal) which relate to antibribery and/or anti-corruption (anti-bribery laws).
- Not do, or omit to do, any act that would cause or lead Meadow to be in breach of any anti-bribery laws.
- Promptly report to Meadow any request or demand for any undue financial or other advantage of any kind received by the supplier in connection with the performance of its obligations to Meadow.
- Have and shall maintain in place its own policies and adequate procedures to ensure compliance with all applicable anti-bribery laws and will enforce them where appropriate.

Sustainability and Commitment to the Environment

Meadow is committed to showing respect for the environment. The minimum standards expected of its suppliers are:

- To seek and prevent pollution.
- To minimise any adverse environmental impacts to the local and global environment.
- To comply with all applicable environmental legislation and other related requirements.
- To continually improve environmental performance by monitoring significant effects on the environment by setting targets for improvement.
- To seek to apply the principles of sustainable development, meeting the needs of the present without compromising the future.
- To use resource efficiently and to minimise waste, apply principles of reduction, reuse, and recycling.

Meadow suppliers must be willing to work collaboratively to drive down the environmental impact of their operations.

Deforestation

Suppliers, where applicable, shall take appropriate steps to ensure their actions do not contribute to deforestation, by procuring ingredients and materials in a way that is environmentally sustainable. Suppliers shall keep documentary evidence of this and provide it, if requested.

Biodiversity

Suppliers shall, where applicable, take appropriate steps to ensure that biodiversity is preserved throughout their operations and their entire supply chain. When establishing new operations or expanding existing ones, suppliers shall take appropriate steps to protect high conservation value areas and foster biodiversity. Suppliers shall keep documentary evidence and provide it, if requested.

Carbon Footprint

Suppliers shall take appropriate steps to assess, measure and reduce their carbon footprint and provide documentary evidence of their carbon footprint, if requested.



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Waste Management

Suppliers shall take appropriate steps to minimise the production of waste and the consumption of natural resources. Suppliers shall put in place practises on waste management, reducing their waste footprint and promoting circular economy.

Water Management and Conservation

Suppliers shall take appropriate steps to minimise their impact on water by reducing their water consumption and ensuring groundwater quality is maintained or improved, as far as possible, supporting water conservation.

Energy Efficiency

Suppliers shall take appropriate steps to minimise the consumption of energy, as well as put in place energy saving strategies (use of renewable sources and fuels, fuel-efficient logistics operations).

Animal Welfare

Suppliers, where appropriate, shall take appropriate steps to ensure the protection of animals and the respect of animal welfare, seeking a constant progressive improvement of the mental and physical needs of animals.

Sustainable Packaging

Suppliers shall take appropriate steps to minimise the environmental impact of packaging. Suppliers shall continuously apply the principles of eco-design, removing unnecessary packaging, selecting recycled materials whenever possible, reducing the number of materials, particularly if coming from non-renewable sources, and facilitating future packaging reuse or recycling.

Management Systems, Monitoring, Continuous Improvement, and Corrective Action

Suppliers are expected to maintain management systems that measure, improve, and communicate to interested parties the environmental, occupational health, and safety and labour performance of the suppliers' operations in a systematic way.

Suppliers are expected to maintain management systems in these areas that include

- Policy – A written statement of the supplier's commitment and objectives for its environmental, health and safety and labour practises.
- Performance objectives, implementation plans and measures, written performance objectives, targets, and implementation plans, as decided and adopted by the supplier, with a plan for assessing the supplier's performance against these objectives.
- Assigned representatives responsible for the implementation of the suppliers environmental, health and safety, ethical, social, and labour programmes.

Supplier Acknowledgement

Suppliers' implementation of this policy may be assessed through monitoring and independent verification. Meadow will work with its suppliers in applying a continuous improvement approach. Suppliers are expected to identify and correct any activities that fall below the standards of this policy.

Suppliers shall immediately report to Meadow any serious breaches of the policy, together with a proposed schedule to correct the breaches, which will be subject to Meadow approval. Where serious breaches persist, Meadow will consider the termination of the business relationship with the supplier concerned.