



CROPWELL BISHOP CREAMERY

SUPPLIER CODE OF CONDUCT FOR ETHICAL TRADE

HISTORY AND ORIGIN

Cropwell Bishop Creamery (CBC) is an independent family-owned company. The Company manufactures Blue Stilton, White Stilton, Speciality White Stilton and Blue Shropshire cheeses.

CBC has been in its current ownership since 1950. When it was acquired by the Skailes family, it was a small, though long-established creamery mainly engaged in the manufacture of cheddar and territorial cheeses. Over the years the creamery has focused on making Blue Stilton (and its white stilton variants), and Blue Shropshire. David and Ian Skailes have run the business together since 1980, in conjunction with their dedicated team of management and staff. Pamela Sykes is a non-executive director.

PURPOSE AND SCOPE

This supplier Code of Conduct establishes basic performance expectations for subcontractors, suppliers, labour providers and agents

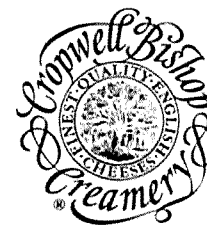
We aim to work with our suppliers to build effective and transparent supply chains. We are reliant on our suppliers for the ingredients and services we use to create great cheese. This includes the monitoring of ethical standards in our supply chain, and we encourage our suppliers to operate to the same ethical standards that we employ ourselves.

SEDEX

CBC is a member of Supplier Ethical Data Exchange (SEDEX) and we now require any suppliers to our business to be SEDEX registered. All ingredient suppliers, labour providers and agents are required to be SEDEX registered including each of the appropriate subsidiary sites or supplier sites that supply goods or labour to CBC. These businesses would also need to be linked to Cropwell Bishop Creamery Ltd (ZC1041059) allowing access to appropriate audit data. It is the responsibility of each supplier to fully complete the Self-Assessment Questionnaire ("SAQ"), followed by an annual review to ensure the accuracy of the information detailed in the SAQ and relevant contact details are up to date.

EMPLOYMENT IS FREELY CHOSEN

To every extent possible work performed shall be on the basis of recognised employment relationship established through national law and practice. Where labour providers are used suppliers must only contract with labour providers which have an identifiable and distinct legitimate business entity where worker contracts will be held within this legal entity. Suppliers shall ensure that their labour providers possess all up-to-date licenses or permits required by national law. There should be senior management approval for the use of a labour provider and protocols and specific policies which define expectations and processes for worker issue remedy. Suppliers shall have a process for annual second party audits of their labour providers or alternatively by an agreed globally recognised scheme. Within the UK suppliers should ensure that all labour providers used to supply workers are licenced by the Gangmasters and Labour Abuse Authority and that the supplier has registered for the GLAA's Active Check Service for every labour provider which they use, ensuring they are covered by the GLAA licence.



FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

All workers have the right to join or form a trade union of their own choosing and collectively bargain with no fear of discrimination. Employees should not be asked about union affiliation during the recruitment process.

WORKING CONDITIONS

A safe and hygienic working environment should be provided in line with local laws and or the appropriate industry best practice standards. The supplier should have policies and procedures in place to identify risks and hazards within the workplace. The management and updating of these policies will be the responsibility of a named senior manager within the business. Appropriate training should be provided to mitigate or eliminate workplace risks as much as practically possible. All workers should have access to clean toilets, washing facilities and potable water and if appropriate hygienic storage conditions for food and drink. If accommodation is used to house workers these must be safe, clean, appropriate to the need and in line with local laws. The provision of accommodation shall not restrict workers freedom of association or their ability to find alternative employment and be provided with equal opportunity and be non-discriminatory. The costs of such accommodation shall be reasonable and not force the workers into debt. There must be a documented audit process to verify the appropriate standard of accommodation.

CHILD LABOUR

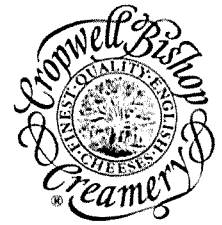
There shall be no new recruitment of child labour. The supplier will comply with laws and regulations related to minimum working age. A worker who is classified as a young worker will not be employed for duties which include night work, be expected to work in hazardous conditions or the use of chemicals. You will have policies and procedures in place to support any child found to be working within the supply chain. These policies must be in line with the relevant ILO standards.

PAYMENT OF APPROPRIATE WAGES

All workers should be paid at least the minimum wage required by applicable laws and provided all legally mandated leave and other benefits. Wage payments should be made at regular intervals and directly to workers, in accordance with applicable law, if any, and not be delayed, deferred, or withheld. Wage deductions must not be used to keep workers tied to the employer or their jobs. Only deductions, advances, and loans authorized by national law are permitted and, if made or provided, should only be taken with the full consent and understanding of workers. Information must be provided to workers at the time of their hire about hours worked, rates of pay, and the calculation of legal deductions in a manner that is understandable and agreeable. Payslips must clearly show the hours worked, any agreed deductions, the hourly rate and total payment made. Wherever possible payment should be made directly into a bank account identified as belonging to the worker, with wages paid regularly and on time. Deductions from pay as a means of a disciplinary process is not acceptable, except for local law exceptions and these deductions are to be agreed and documented with the worker concerned.

WORKING HOURS

Working hours are determined by local laws or standards whichever provides the greatest protection to the workers involved. All workers shall not be expected to work over 48 hours per week on a regular basis and overtime, which shall be voluntary, kept below a threshold of 12 hours per week. The overtime should be voluntary and paid at a premium rate and not having a negative effect on any other accrual of benefits, e.g. holiday entitlement or pension.



NO DISCRIMINATION IS PRACTICED

All employment shall be given on the basis of equal opportunity and fairness, with workers free to find alternative employment if they require without threat or sanction. All work shall be voluntary, there shall be no discrimination against any potential worker hiring, compensation, access to training, promotion, pension, or other benefits based upon race, caste, ethnicity, religion, age, gender, marital status, sexual orientation, disability, union membership or political affiliation. CBC expects suppliers to have a policy that explicitly bans discrimination/bullying and harassment based on sexual orientation, race, gender, or gender identity/expression. In addition, suppliers are also encouraged to have evidence of diversity and inclusiveness training that is inclusive of sexual orientation and gender identity/expression. CBC expects suppliers to have equivalent policies to promote diversity in their supply chains and purchase from diverse businesses. Suppliers agree to make a reasonable effort to utilise diverse suppliers and provide evidence where requested.

NO HARSH OR INHUMANE TREATMENT

All forms of mental, physical, or sexual intimidation are prohibited, and suppliers should have a procedure in place to identify and support workers affected. Disciplinary policies and procedures should be clearly defined and communicated to all workers and not include any inhumane disciplinary measures, including corporal measures, punishment, mental or physical coercion or verbal abuse of workers. Disciplinary procedures must not include sanctions that result in wage deductions, reduction in benefits or compulsory labour.

MIGRANT LABOUR

Where migrant labour is used CBC expects its suppliers to have a clear understanding of the processes, fees and costs associated with this. This includes all the fees and costs incurred for migrant worker recruitment, origin, transit (where applicable), destination countries and any outstanding debts the worker may incur because of the process. Based on this understanding, a time bound action plan should be developed to move to a responsible recruitment model in line with Employer Pays Principles and ILO definition on recruitment fees and costs and be incorporated within a recruitment policy. A company or group migrant worker recruitment policy should stipulate clearly what fees and costs shall be borne by workers and the employer respectively as well as the main principles that shall guide the supplier's recruitment activities and their engagement with registered recruitment agencies, registered sub-agents, 3rd party recruiters or suppliers.

ENVIRONMENT

We support and encourage business practices that are sustainable, and those that continually work towards improving efficiency and sustainability in line with their goals. It is a prerequisite that you shall comply with all local and national environmental legislation and have a process to assess the supply chain risk and impact of your sourcing strategy on the environment, a culture which delivers continuous improvement in mitigating any identified risks, highlighted from a robust evaluation process. These goals should include, but not be limited to, water conservation (sustainable agriculture), reduction in carbon, deforestation, reduction in plastics, a reduction in food waste and the ongoing reduction of chemicals.

RESPONSIBLE RECRUITMENT

Workers must not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel to the receiving country and processing official job-related documents and work visas in both home and host countries. Written contracts of employment must be provided to workers in their native language or a language the workers understand, clearly indicating their rights, responsibilities, and conditions of employment, including wages and rates of pay, benefits, working hours, locations of the work, transportation to and from the work



site (if applicable), living conditions, housing and associated costs, work-related hazards, and other working and employment conditions.

Please refer to Crompton Bishop Responsible Recruitment Policy.

GRIEVANCE MECHANISMS

An effective, confidential grievance mechanism should be established to ensure that any worker, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind. The grievance procedure will include an appeal process for workers who disagree with how a grievance is resolved. The grievance mechanism should be available from the point of recruitment and available in workers' native language or a language the workers understand.

Grievance mechanisms must include the ability to report grievances anonymously.

WORKER TRAINING AND AWARENESS

Workers should be made aware of their rights and responsibilities both verbally and in writing at the time of hire, including the terms and conditions of their employment, the provisions of this Code and all applicable laws and regulations.

Version Number	Detail	Date	Approved by
1	Original policy issued	July 2022	Robin Skailles
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