



Ethical Policy

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Ethical Policy Statement

Overview

It is Greenvale AP Ltd's aim to ensure that all workers who are directly employed by the Company or working within the supply chain to the Company are employed in conditions that meet or exceed the Ethical Trading Initiative (ETI) base code and the fundamental International Labour Organisation (ILO) conventions

The company will achieve this by:-

- Providing the resources and training necessary for key personnel to implement the Company Ethical Policy and to develop their skills in the area of ethical trading.
- Ensuring senior management is involved in the implementation and management of the Company Ethical Policy.
- Providing all Greenvale employees with a confidential means of reporting violations of the ETI base code via the Company grievance procedure and/or whistleblowing facility.
- Taking part in third party ethical audits and acting upon recommendations arising from these audits.
- Seeking to source products, services and supplies from companies that observe, as a minimum, the standards of the ETI base code and fundamental ILO conventions.
- Encouraging suppliers who do not comply with the ETI base code to work towards compliance over an agreed time scale.
- Monitoring and recording the implementation of the of the Company Ethical Policy across the supply chain by self assessments, company inspections and third party inspections as appropriate.
- Communicating this policy to all suppliers, staff and sub contractors via Company notice boards, circulars and the internet.
- Monitoring changes to the ETI base code and other relevant legislation and communicating any changes to those personnel who may be affected.
- Reporting annually the progress of the implementation of this policy to customers and supply chain stakeholders.

Corporate Social Responsibility

Our Ethical Policy represents our dedication to doing business in the correct manner, improving our good reputation and developing strong business relationships.

To ensure all our potatoes come from responsible, ethical sources we adopt the following procedures:

- AB Membership of Supplier Ethical Data Exchange (SEDEX). As an AB member we require our entire supplier base to join SEDEX and complete a self-assessment.
- All of our own production sites post their self-assessment information on the SEDEX website and update every 6 months.
- All of our production sites undergo independent third party ethical audits every 2 years which are posted onto the SEDEX website.
- All our overseas suppliers are required to post their information on SEDEX.
- We utilise the SEDEX risk assessment tool to pinpoint and address areas of concern within our supply base.
- We only use labour agencies that are approved by the Gangmaster and Labour Abuse Authority (GLAA) and we also audit our labour suppliers.

- We have ethical standards which underpin the behaviours of everyone engaged by Greenvale.

Compliance and Monitoring / KPIs

Listed below, identified monitoring to ensure compliance of ethical trading policy:

Audit/Details	Frequency / KPI	Responsibility
Review of SEDEX Self Assessment Questionnaires for own sites.	Twice per year.	HR
Review of third party ethical audits for own sites.	Every 2 years – as per SEDEX category.	HR with sites
Review of first and second party ethical audits for own sites.	As required.	Site
Review of ethical strategies and KPIs.	Annually (Strategy)	Group Directors,
Review of SEDEX Self Assessment Questionnaires/audits for suppliers.	SEDEX and grower compliance/management plan. Growers - <ul style="list-style-type: none"> • 100% SAQ completion • Reduce no. of medium risk growers • Independently check a proportion of SAQ's 	Technical / Group
Track employee 60 hour working per working week – as per ETI base code.	Less than 60 hours worked per working week. If over, reason for submitted and justified.	HR to group/sites
Track employee consecutive working days – as per ETI base code.	Workers shall be provided with at least one day off in every seven day period or, two days off in every 14 day period.	HR to group/sites
Labour providers are audited to ensure compliance with national requirements.	Twice per year including worker interviews and document checks. There will be an annual audit over a minimum of 2 x 6 monthly visits. Audits will be conducted by trained employees and/or outsourced to an accredited 3 rd party. GLAA 'active checks' will be carried out monthly.	HR and/or accredited 3 rd party
Suppliers must meet with labour providers formally at least 6 monthly to review compliance with policy and demonstrate improvement plans.	Include as agenda item in quarterly meetings with LP	HR
All employees receive ethical training /overview. HR/ Managers to attend ethical training as required for position.	ETI communicated via policy/handbook and induction. Stronger Together/ Modern Slavery training attended by Mgrs. and HR team (as per training policy).	HR / sites

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