


SUNCREAM DAIRIES LTD

QM 7.8.15 SOCIAL COMPLIANCE POLICY



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Owner Signature	

What is this policy for?

We believe that our success is built on a foundation of personal and professional integrity. We understand the challenge of ensuring high social, ethical and environmental standards within our business and throughout our supply chain and are committed to working collaboratively with our suppliers to ensure that these standards are continually improving.

In order to achieve this, we have developed this Social Compliance policy which defines our minimum standards for employees, along with the basic principles we expect from all our Suppliers and Contractors.

Who is this policy for?

This policy applies to all our employees, temporary workers, consultants, contractors, agency staff and anyone engaged to work for us, members of the local community, suppliers and subsidiaries acting for, or on behalf of us ("associated persons") within the UK and overseas. This policy does not form part of your contract of employment.

General Provisions

Business Partners (including but not limited to manufacturers, factories, suppliers, and subcontractors) must comply fully with all legal requirements relevant to the conduct of their businesses. This policy communicates our values and expectations and emphasises the importance of responsible workplace policies and practices, which generally comply, at a minimum, with applicable occupational H&S, environmental and labour laws and regulations. The standards outlined below reflect the values we uphold in our own policies, and we expect our employees and suppliers to follow these standards and requirements:

Labour Standards

We will ensure employment is always freely chosen. There is no forced, bonded, indentured or involuntary prison labour within the organisation. Workers are not required to pay fees or lodge "deposits" or original identity papers with their employer and are free to leave us after reasonable notice.

We will ensure that wages and benefits paid for a standard working week meet, at a minimum, national legal standards. You will be provided with written and understandable information about your employment conditions in respect to wages before you enter employment and about the particulars of your wage for the pay period concerned each time that you are paid.

Your wages will always be paid directly to you, at the agreed intervals as per your Contract of Employment and in full. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without your express permission.

In respect to your working hours we will ensure compliance with the Working Time Regulations 1998 and will endeavour to provide regular employment to every extent possible. We will not avoid our obligations to you

SUNCREAM DAIRIES LTD

QM 7.8.15 SOCIAL COMPLIANCE POLICY



as an employee through the use of subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment. The policies we have in place will ensure that migrant, contract, part-time and home-workers receive the same rights, benefits and opportunities as other workers performing similar activities.

We explicitly prohibit all forms of modern slavery and forced labour, including debt bondage, exploitation of populations displaced by environmental or socio-political crises, and the misuse of digital platforms to facilitate exploitation, consistent with the UK Modern Slavery Act 2015 and associated guidance.

Our commitment to all legal requirements in respect of your labour can be found in more detail within your Contract of Employment and the Employee Handbook and associated policies.

Child Labour

In the conduct of our business, we:

- Will not employ children that falls into the definition as stipulated by ILO Convention, notwithstanding any national law or local regulation;
- will comply with all other applicable child labour laws, including those related to wages, hours worked, overtime and working conditions;
- are against all forms of exploitation of children.
- will not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities.
- expects our business partners and associates to have and uphold similar standards and abide by country-governing laws in countries wherein they operate.

Should violation of these Principles become known to us, we will take serious action, including discontinuation of the business relationship. Further information can be found in our Modern Slavery Policy.

Freedom of Association

The freedom of association and the right to collective bargaining is respected. We adopt an open attitude towards the activities of both trade unions and worker organisations. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Health & Safety

We will ensure a safe and hygienic working environment is provided. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of your work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in your working environment.

Applicable occupational Health and Safety regulations will be adhered to in line with our Health & Safety Policy to ensure a working environment which is safe and conducive to good health is provided. We will ensure you receive regular and recorded health and safety training and such training shall be repeated for new or reassigned workers.

SUNCREAM DAIRIES LTD

QM 7.8.15 SOCIAL COMPLIANCE POLICY



We carry out general workplace risk assessments periodically to assess the risks to the health and safety of employees, visitors and other third parties as a result of our activities, and to identify any measures that need to be taken to control those risks.

Our Health & Safety Policy will further set out our commitment to ensuring we meet our health and safety obligations.

Environmental Commitment

We shall comply with all applicable environmental laws and regulations. This shall include having processes in place to ensure compliance with those regulations relating to the handling, recycling, and disposal of dangerous or hazardous materials.

In respect of packaging and paper, undue and unnecessary use of materials is avoided, and recycled materials are used whenever appropriate. Where possible waste is segregated into different recycling streams and collected from site.

In respect of energy use, all production and delivery processes, including the use of heating, ventilation, lighting, IT systems and transportation, are based on the need to maximise efficient energy use and to minimise harmful emissions.

We are committed to the purchase of sustainable palm oil. In order to show our support for the transformation of the palm oil industry we are working towards membership of the Roundtable on Sustainable Palm Oil (RSPO).

Our membership of the Rainforest Alliance (RFA) is evidence of our commitment to supporting more sustainable cocoa farming. In addition our coconut products are sourced only from farmers that do not use chimpanzees in the harvest of their produce.

Local Community Engagement and Support

As part of our commitment to social responsibility, our company recognises the importance of engaging with and supporting the local communities where we operate. We are dedicated to fostering positive relationships and contributing to the well-being of these communities by respecting and collaborating with them.

When required we will engage with local community members and leaders to understand their needs and concerns. Our operations will respect local customs, cultures and traditions, and we will collaborate with community stakeholders to ensure our presence has a positive impact.

Title Laws & Regulatory Compliance

As we strive to reach our business goals, we shall ensure we meet the necessary compliance rules and regulations. As a compliant company we will demonstrate that we are a reputable business that respects the interests of our stakeholders by operating responsibly. Whilst we are all responsible for adhering to Title Laws and Regulations laws we have identified partners that will support us in our adherence:

SUNCREAM DAIRIES LTD

QM 7.8.15 SOCIAL COMPLIANCE POLICY



- UK Food Safety Laws and the requirements of the British Retail Consortium (BRC)
- Health & Safety: Health and Safety regulations will be adhered to in line with our Health & Safety Policy and the Health and Safety at Work etc. Act 1974
- Our HR Partners HR Caddy Ltd will ensure we comply with all and every relevant employment law to ensure your rights and wellbeing are protected

These partners will ensure that any changes to relevant laws and regulations are understood, cascaded and implemented throughout the business, and the site's policies and procedures are amended as necessary. These changes will be presented in the monthly management report and where necessary we will communicate these with you during our monthly staff meetings.

Site Legality

We are a company that upholds, and as a minimum complies with, all UK laws and regulations relevant to our activities. We have ensured that we are operating legally in our premises with the correct business licences and permissions and that all relevant land rights have been complied with. And we expect the same from our suppliers.

Further information can be found in the Land Rights Policy.

We commit to:

- Allocate the required resources in order to fully implement the Policy, including an internal system to record and monitor compliance throughout the supply base to this Policy.
- Assign responsibility for the implementation of this Policy to an appropriately trained management representative who will provide compliance updates and implementation performance as required.
- Work collaboratively with our suppliers, supporting them in the improvement of social, ethical and environmental standards where required and appropriate.
- Full compliance with this Policy within our own business and to ensuring that all relevant employees are aware of the social compliance Policy.
- Acknowledge specific national, regional and cultural challenges that may affect compliance. Recognise suppliers' own standards where they are comparable to our own.
- Communicate this Policy to all suppliers and contractors.
- Communicate periodically to stakeholders
- Periodically review this policy in order to continually improve, taking into consideration changes in legislation, and any other requirements to which we subscribe, and in order to ensure the adequacy, suitability and continuing effectiveness of the policy.
- Cease trading with suppliers demonstrating a persistent disregard for this Policy while giving appropriate consideration to the impact this may have on the supplier and community in which they operate.

We require our suppliers to:

- Comply with this Policy and all applicable laws in the countries in which they operate. Where standards differ, the standard which offers the greater degree of protection to workers shall apply.
- Communicate the Policy to all stakeholders engaged in their supply chain.

SUNCREAM DAIRIES LTD

QM 7.8.15 SOCIAL COMPLIANCE POLICY



- Communicate openly and honestly with us and allow access to documentation as required to determine performance against this Policy.
- Not violate the basic rights of Suncream Dairies therefore our suppliers should not be engaged in:
 - The manufacture of arms.
 - The sale of arms to governments which systematically violate the human rights of their citizens: or where there is internal armed conflict or major tensions; or where the sale of arms may jeopardise regional peace and security

Ethical Use of Technology and Digital Monitoring:

We recognise the increasing role of technology in modern work environments, including remote and hybrid working arrangements. The use of digital tools, platforms, and monitoring technologies will be conducted ethically, transparently, and proportionately. Any monitoring of employees' or workers' activities will respect privacy rights, comply with legal requirements, and be limited to what is necessary for legitimate business interests such as security, performance management, or regulatory compliance.

We maintain robust technical and organisational measures to protect personal data against unauthorised access, loss, alteration, or disclosure. Our security measures are regularly reviewed and updated to address emerging threats and vulnerabilities.

Continuous Improvement

We commit to periodically review this policy in order to continually improve, taking into consideration changes in legislation, and any other requirements to which we subscribe, and in order to ensure the adequacy, suitability and continuing effectiveness of the policy. Specifically, the policy will be routinely reviewed at our Management Meetings.

ETI Base Code

We are pleased to confirm that Suncream Dairies fully adheres to the Ethical Trading Initiative (ETI) Base Code. The ETI Base Code reflects key international standards and is founded on the conventions of the International Labour Organization (ILO). Our commitment to these principles underscores our dedication to ethical business practices and responsible sourcing.

Date	Reason for Change
9 th October 2023	Regular Policy Review Addition of document location
11 th July 2024	Added reference to ETI Base Code
5 th June 2025	Review and addition of clause relating to the ethical use of technology and digital monitoring

Managing document location:

SUNCREAM DAIRIES LTD

QM 7.8.15 SOCIAL COMPLIANCE POLICY



Hard Copy or LMS location:	<ul style="list-style-type: none">- LMS- Staff Room- Printed Employee Handbook- Supplier Code of Practice
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