

Country **Style**



# Code of Conduct

October 2023



# Contents

1. Introduction
2. Human Rights Policy
3. Ethical Trading Initiative
4. Equality, Diversity and Inclusivity Policy
5. Child Remediation Policy
6. Disciplinary Procedure
7. Grievance Policy
8. Hidden Labor Exploitation
9. Anti-Bribery Policy
10. Whistleblowing Policy
11. Slavery and Human Trafficking Statement



## **1. Introduction**

We strive to ensure that everyone who works with and for Country Style Foods, acts in an ethical, professional, and respectful manner as well as complying with all legal requirements.

### **Our Values.**

#### **1. Resourceful**

The ability to find quick and clever ways to overcome difficulties. Always look to reduce all kinds of waste across the business. Avoid wasteful expense. Treat company money as our own. Be careful/thrifty.

#### **2. Innovation friendly**

We want to operate in an environment that allows innovation to flourish. Ideas should not be 'shot' down. We will be receptive to new ways of working. We value and reward innovation.

#### **3. Agile**

We want an environment that allows people to think and act easily. We want to be fleet footed and work at pace, not burdened by bureaucracy and red tape. We will act quickly when business opportunities are identified and we will be responsive to our customers.

#### **4. One Family**

We are a family business and we want all colleagues to be part of this. We want to be supportive, respectful, honest, open, caring and act with integrity. Family and community are important to us.



## **2. Human Rights Policy**

### **INTRODUCTION**

Respect for Human Rights is key to the success of our company. Country Style is committed to ensuring that people are treated with dignity and respect. The purpose of the policy is to communicate to our employees, customers, and suppliers, the ethical and social values we respect, and our commitment to uphold human rights.

### **SCOPE**

Human Rights are the universal rights that every human being is entitled to enjoy and have protected. We are committed to performing our business to the highest standards of ethics and in accordance with our values.

### **POLICY**

#### **1. Valuing Diversity**

The company values the diversity of the people with whom we work and the contribution they make. We are dedicated to providing an environment in which everyone is able to work without harassment (including victimisation and bullying), on account of race, sex, colour, nationality, ethnic origin, gender, disability, marital status, sexual orientation, religion, social or employment status, age, or any other reason. These principles and the protection that they provide, apply to all permanent and temporary employees, job applicants, agency employees and contractors. All employees shall conduct themselves in accordance with the highest ethical standards.

#### **2. Safe and Healthy Workplace**

The company provides a safe and healthy workplace and complies with applicable safety and health laws, regulations and internal requirements. We are dedicated to maintaining a productive workplace by minimizing the risk of accidents, injury and exposure to health risks and to continually improve health and safety in our workplace. All employees shall receive an appropriate level of training to enable them to identify hazards.

#### **3. Work hours, Wages and Benefits**

The company compensates employees competitively relevant to the industry and in accordance with legislation. Wages and other payments will be clearly defined, paid out on a regular basis, and cover living costs. Maximum working hours shall not exceed 48 hours per week unless an individual has chosen to waive the individual's rights.

#### **4. Slavery Legislation**

The company prohibits the use of all forms of forced labour and the hiring of individuals under the age of 18 years to undertake hazardous work.



## **5. Whistleblowing**

Country Style is committed to conducting our business with honesty and integrity and we expect our employees to

maintain high standards. We encourage a culture of openness and accountability in order to prevent such concerning situations from occurring or to address them when they do occur.

Country Style employs an external third-party to operate an anonymous service for colleagues to report any serious concerns which they are uncomfortable raising in any other way, such as malpractice or unlawful conduct. Examples might be theft, fraud, bullying or discrimination. Employees will not suffer any detrimental treatment as a result of raising any genuine concern.

Employees can raise concerns, complaints or make a report in confidence by contacting Navex Global free by telephone 24 Hours 7 Days on 0808 196 856; or email: [countrystyle@navexglobal.co.uk](mailto:countrystyle@navexglobal.co.uk); or through the Web based reporting system: [www.countrystyle.ethicspoint.com](http://www.countrystyle.ethicspoint.com)

## **6. Learning and Development**

The company relies on the knowledge, skills and behaviour of our colleagues to achieve its objectives. It is committed to developing and training all staff, including those on casual and fixed term appointments, to the standard necessary to achieve our business objectives. All members of staff will have equal opportunity and treatment in matters relating to learning and development and will be encouraged to reach their full potential.

## **7. Environmental Protection**

Environmental and safety regulations on handling waste, chemicals or other dangerous materials or substances is complied with, and workers will be trained in handling dangerous materials and substances.



### **3. Ethical Trading Initiative Policy**

#### **INTRODUCTION**

Ethical trading, and compliance with the Ethical Trading Initiative Base Code, is an important company objective. It is the policy of Country Style Foods to be conscious of our responsibility to ensure everything we produce is done under decent conditions and everyone involved is treated fairly.

#### **POLICY**

##### **1. Employment is freely chosen**

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

##### **2. Freedom of association and the right to collective bargaining are respected**

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 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.

##### **3. Working conditions are safe and hygienic**

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Our workers have access to clean toilet facilities and to potable water, and sanitary facilities for food storage are provided.
- 3.4 Accommodation is not provided by Country Style Foods.
- 3.5 Responsibility for Health and Safety is a senior management representative – EHS Advisor.





#### **4. Child labour shall not be used**

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.3 These policies and procedures shall conform to the provisions of the relevant ILO standards.
- 4.4 Country Style Foods is committed to developing or participating in and contributing to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.5 Country Style Foods is committed not to recruit or hire workers below the age of 16.
- 4.6 If child labour is discovered the company will remediate situation in the best interests of the child and his or her family.
- 4.7 Effective systems are in place to check the ages of all recruited employees and copies of official documentation for every worker that verifies the date of birth are held.

#### **5. Living wages are paid**

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards.
- 5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure are not permitted. No deductions from wages not provided for by national law will be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

#### **6. Working hours are not excessive**

- 6.1 Working hours must comply with national laws, collective agreements.  
Sub clauses 6.2 to 6 are based on international labour standards.
- 6.2 Basic working hours, excluding overtime, do not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime is compensated at the rate set out in colleagues' contracts.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
  - this is allowed by national law;
  - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
  - appropriate safeguards are taken to protect the workers' health and safety; and
  - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.



## **7. No discrimination is practiced**

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

## **8. Regular employment is provided**

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, 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.

## **9. No harsh or inhumane treatment is allowed**

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

## **10. Entitlement to Work**

10.1 Only workers with a legal right to work in the country are employed.

10.2 For both workers and agency workers, original documents are reviewed and then returned to workers to verify right to work.

## **11. Labour Agencies**

11.1 Labour agencies only supply workers registered with them.

11.2 Relationships with labour agencies are covered by a Service Level Agreement which meets all national legal requirements.

11.3 Labour agencies are audited every 6 months to ensure compliance with national requirements.

## **12. Human Rights**

12.1 The company commits to protecting human rights in the workplace as documented in the Human Rights Act 1998.

To this end, the company adopts as policy, Codes of practice for employment rights of employees and expects the same of approved suppliers throughout the supply procurement chain.





We confirm that we comply fully with all relevant European Legislation and are members of SEDEX (Supplier Ethical Data Exchange). Confirmation that suppliers comply with the requirements of this policy is done through questionnaire, direct or third-party inspection.

The company is compliant with the requirements of the Gang master Licensing Authority.

### **13. Identifiable Members of Management**

13.1 The identifiable members of management who are responsible for compliance with the Ethical Trading Initiative Base Code, are:

- Managing Director
- HR Director
- Group Head of EHS
- Site Manager
- HR Manger



## ETI Base Code



The ETI Base Code is an internationally recognised set of labour standards based on ILO conventions. It is used by ETI members and others to drive improvements in working conditions around the world.

[www.ethicaltrade.org](http://www.ethicaltrade.org)



Employment is freely chosen



Freedom of association and the right to collective bargaining are respected



Working conditions are safe and hygienic



Child labour shall not be used



Living wages are paid



Working hours are not excessive



No discrimination is practised



Regular employment is provided



No harsh or inhumane treatment is allowed



## **4. Equality, Diversity & Inclusion Policy**

### **COMMITMENTS**

Country Style Foods is committed to encouraging equality, diversity and inclusivity and promoting equal opportunities. We are committed to colleagues receiving equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation.

We treat any complaints of bullying, harassment, victimization or unlawful discrimination seriously by fellow colleagues, customers, suppliers, visitors, and any others in the course of work activities. The company has a grievance procedure in place that all colleagues, visitors and suppliers may take should they wish to raise any such concern.

Country Style Foods provides opportunities for training, development and progression to all colleagues.

Any decisions concerning colleagues are made on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act 2010).

Country Style Foods is committed to ensuring that 30% of our Supervisory and Management roles are occupied by women by the end of 2025. To support this the company has a 'Women in Leadership' training programme that is available to colleagues of the business who are female or identify themselves to be female and are either in or would like to progress into a leadership role.

The company reports the Gender Pay Gap on an annual basis. This report is subject to board approved and is published on the company website.

A Group Gender Diversity & Inclusivity Lead (Group GD&I Lead) is in place to review employment practices and procedures when necessary to ensure fairness and to also update policies to take account of any changes in the law.

The Group GD&I Lead monitors information regarding age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the company's equality, diversity and commitments.

The Group GD&I Lead monitors the Gender Pay Gap information and any supporting action plans.

The Group GD&I Lead works closely with Site Managers and HR Managers in delivering Diversity and Inclusion (D&I) initiatives across our sites and to our colleagues.



## DEFINITIONS

For the operation of this policy the following definitions apply:

Gender refers to the characteristics of women, men, girls and boys that are socially constructed. This includes norms, behaviours and roles associated with being a woman, man, girl or boy, as well as relationships with each other (Source: World Health Organisation).

Diversity - Diversity is differences in racial and ethnic, socioeconomic, geographic, and academic/professional backgrounds. It is people with different opinions, backgrounds (degrees and social experience), religious beliefs, political beliefs, sexual orientations, and heritage and life experience. Diversity is recognizing difference, acknowledging the benefit of having a range of perspectives in decision-making, and the workforce being representative of the organisation's customers. (Source; CIPD).

Inclusivity - Inclusivity is the practice or policy of providing equal access to opportunities and resources for people who might otherwise be excluded or marginalized, such as those having physical or mental disabilities or belonging to other minority groups. It is valuing people's differences and enabling everyone to thrive at work. (Source; CIPD).

Equality – Equality is the state of being equal. Everyone should have a right to equal access to employment and, when employed, should have equal pay and equal access to training and development. (Source; CIPD)

## 5. Child remediation Policy



## INTRODUCTION

Country Style Foods is committed to our responsibilities for protecting Young Workers and ensuring compliance with the United Nations International Labour Organisation's Conventions (ILO) 138 and 182 relating to Child Labour.

We are committed to protecting the rights of Young Workers and remedying any instances of child labour.

Country Style Foods will not engage in or condone the unlawful employment or exploitation of children in the workplace or the use of forced labour in our own operations or supply chain.

No child is to be employed or engaged in the production of our products or the supply of materials or services to us.

## SCOPE

This policy applies to:

All Country Style sites and facilities including any subsidiary companies or joint ventures.

All suppliers: all suppliers are expected to demonstrate full compliance with this policy and accept their responsibilities under the remediation process. Suppliers are also required to monitor their own supply chains including labour providers

All cases of child labour and involvement of children in "light permissible work as "young workers" as defined by ILO conventions No. 182 and 138 regardless of length of service or status of work. This includes permanent, temporary, informal or contract labour, whether directly or indirectly (via subcontractor or in family work) employed by the management of the workplace as well as children who have been trafficked or sold into work.

## DEFINITIONS

For the operation of this policy the following definitions apply:

Child - A "Child Worker" is defined as someone who has not reached their 15th birthday, or any higher age specified in local law for completing mandatory schooling or beginning full time work. The legal minimum age of work can vary depending on the country and so suppliers should seek guidance from national law.

Child Labour – Is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to their social, physical and mental development. This refers to work that is mentally, physically, socially or morally dangerous and harmful to children, and interferes with their schooling. i.e. depriving them of the





opportunity to attend school, obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

**Hazardous Work** - Any work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of Children. This includes: working with chemicals, machinery or electrics; working in confined spaces, at height or in excessively hot or cold conditions; being exposed to dust, fumes or loud noise; lifting or carrying heavy loads; working overtime or working at night.

**Young Worker** - A young person who is legally entitled to work i.e. above the minimum age of employment of 15 and below the age of 18.

## KEY PRINCIPLES

- The safety and security of the child are paramount, and the protection of the child comes first.
- A child should not be dismissed without a plan in place for what will happen to him or her.
- Any resolution or remediation action must ensure that the child is not going to suffer financial losses, and should not leave a child vulnerable to abuse.
- Investigations and remediation plans should be made in conjunction with the child's parents or guardian and consultation should be sought from relevant local and trusted professionals, including the local government authorities and child protection agencies.
- Remediation plans for young workers who are engaged in hazardous or night work should include the offer of an alternative role, without penalty for them.
- 

## YOUNG WORKERS

There are certain types of work which young people should not be employed to do. We will not employ a young person for work:

- which is beyond physical or psychological capability;
- involves exposure to harmful agents;
- involves harmful exposure to radiation;
- involving the risk of accidents which would not be recognised or avoided;
- involving risks from extreme cold / heat, noise or vibration.

Country Style Foods supports the employment of Young Workers and our supply chain provided that they do not perform hazardous work and there are adequate precautions in place for their protection.

Country Style Foods supports formal work-based training or apprenticeship programmes that enable Young Workers to learn new skills. These programmes must be aimed at developing Young Workers' skills and experience and meet local legal requirements (where applicable) and subject to the above precautionary measures.

Young Workers must be paid at least minimum wage for every hour worked including any training time.

If a Young Worker is found to be performing hazardous work the following act on must be taken:

- Immediately remove the Young Worker from the task where the hazard is present;
- Continue to employ the Young Worker in an alternative role without any reduction in pay or benefits.



## **CHILD REMEDIATION REPROCESS**

If it is suspected that an underage worker is employed at any of our sites or in the supply chain then immediate steps should be taken to verify the age of the individual against official documentary evidence.

### **In the event that an underage worker/s is found working it is necessary to:**

- Act quickly and appropriately by removing the worker from the work area to ensure their safety.
- Record the names, ages and contact details of the workers concerned.
- Explain the legal requirements and restrictions on working ages to the child clearly and carry out an age verification check.
- Consult with child focused organisations and local authorities regarding any child allegedly or confirmed to be involved in child labour.
- Terminate the employment relationship.
- Treat each situation of child labour on a case-by-case basis to ensure the best interest of the child taking into account their specific needs and aspiration when drawing up the remediation programme.

### **The remediation programme is to include:**

- Assisting them to find a school and support them financially through their education (vocational training or formal education).
- Compensating the child's family for at least the wage they were earning. These wages will be paid monthly (not as a lump sum) until the child has reached the legal minimum age for working.
- At the end of the period of education guaranteeing paid employment to the child worker at the same level in which they were previously employed if they wish to return.
- Agreed monitoring period by Country Style Foods.
- A full investigation should be carried out to identify how this has happened and action taken to prevent reoccurrence.

### **Additionally there is an obligation on the following parties:**

**Managing Director:** to notify immediately all relevant Customers where an underage worker has been found working at one of our sites or in our supply chain for their product.

**HR Director:** to assume responsibility for the remediation process and monitor the implementation and progress of the programme.

**Group Supplier Assurance Manager:** is required to notify immediately the relevant designated contacts in the event of an underage worker being found working for a supplier.

The supplier is also required to fulfil its responsibilities for financially supporting a remediation programme (as outlined above) by working together with Country Style Foods to develop a responsible solution that is in the best interests of the Child; ensuring no financial detriment to the child, their dependants, and no breach to their human rights. Providing this happens then Country Style Foods will continue its business relationship with the Supplier.



## **CONTINUED GOVERNANCE**

Country Style Foods will write to the supplier and take formal action if the supplier does not demonstrate cooperation with this Policy.

Country Style Foods reserves the right to discontinue the business relationship with any supplier if they deliberately breach this policy or fail to demonstrate action towards an agreed remediation programme.

Country Style Foods will regularly review and audit our own recruitment providers to ensure compliance, and reserve the right to carry out audits of our supply chain.

## **6. Disciplinary Procedure**



There is a fair and systematic approach to the enforcement of the standards of conduct affecting all grades of colleagues.

Disciplinary action may be taken when an employee fails to meet satisfactory standards with regards to conduct, performance attendance, timekeeping or observance of working rules and regulations.

On some occasions a meeting may be held with an employee to discuss their performance, without any formal warning being issued as a result of the meeting. A note for their file may be made for the record. This will not be classed as formal disciplinary action. It may however be taken into account should they fail to make any improvement necessary or commit further misconduct.

The disciplinary procedure may begin at any stage depending on the seriousness of the incident.

Employees have the right to representation and may be accompanied by another employee or union representative at every stage of the procedure.

Disciplinary interviews are held in more serious cases of alleged misconduct. A manager and another officer of the company will conduct the pre-arranged hearing to establish the facts surrounding the incident and the employee will have the opportunity to explain reasons or facts about the incident.

A disciplinary meeting may result in a colleague being issued with:

**Verbal Warning:**

- Recorded by formal letter stating reasons and explanation of disciplinary action. Issued by Supervisor/Manager.
- Effective for 3 months without further incident.

**First Written Warning:**

- Recorded by formal letter stating reasons and explanation of disciplinary action. Issued by Manager or above.
- Effective for 6 months without further incident.

**Final Written Warning:**

- Recorded by formal letter stating reasons and explanation of disciplinary action. Issued by Manager or above.
- Effective for 12 months without further incident.

**Dismissal:**



- Recorded by formal letter to home address identifying fully reasons for dismissal. Issued by Manager or above.





## **7. Grievance Procedure**

It is essential that, if any colleague has a grievance relating to their employment, the correct procedure is followed to enable the company to deal with it quickly and professionally.

If you have any issue or grievance, it should initially be discussed with your Supervisor or Manager.

If this does not resolve the matter, your grievance can be recorded in writing to a Senior Manager or HR Manager who will reply in writing within ten (10) days.

You will be given the opportunity to attend a grievance meeting at which you have the right to be accompanied by a work colleague or by a union representative.

If the matter is not resolved to your satisfaction you may contact the Managing Director in writing.

All grievances will be treated in the strictest confidence. No employee will suffer any detrimental treatment as a result of raising a grievance.

It is imperative to note that colleagues have the right to raise any grievance anonymously if you wish. To protect anonymity, grievances can be emailed to [feedback@risewithcountrystyle.com](mailto:feedback@risewithcountrystyle.com) or put in writing addressed to: HR Director, Country Style Foods, 50 Pontefract Lane, LS9 8HY (all envelopes should be marked Private and Confidential).

Alternatively, Country Style also employs an external third-party to operate an anonymous service for colleagues to report any grievance or concerns which they are uncomfortable raising in any other way.

You can raise your concern in confidence by contacting Navex free by telephone 24 Hours 7 Days on 0800 196 5856 or through the Web based reporting system: [countrystyle.ethicspoint.com](http://countrystyle.ethicspoint.com).

No colleague will suffer a detriment for raising a grievance.



## **8. Preventing Hidden Labour Exploitation policy**

### **INTRODUCTION**

Country Style Foods commits to developing and adopting a proactive approach to tackling hidden labour exploitation.

Hidden labour exploitation is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

### **SCOPE**

This policy applies to all Country Style Foods sites.

### **RESPONSIBILITY**

The managing director (Joe Wood) has overall responsibility for this policy.

### **POLICY COMMITMENTS**

Country Style Foods shall:

1. Designate appropriate managers to attend “Tackling Hidden Labour Exploitation” training and to have responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost, and will not allow these to be paid by job applicants. Oliver Rae Ltd will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and signs to look for and have signed appropriate Compliance Principles.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Labour Abuse Authority and Police if Modern Slavery is suspected.
6. Provide information on tackling “Hidden Labour Exploitation” to our workforce through workplace posters, worker leaflets, induction, etc.



7. Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities and inform the best ways how to do report any case.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.
10. Monitor referrals of applicants particularly those that are supplied via a refer a friend scheme.



## 9. Anti-Bribery

The company expressly prohibits the giving or acceptance of any gratuity to or from a supplier, customer or service provider with whom the company does business or is considering for future business.

Gratuities are interpreted to include gifts, monies, loans, trips, meals, lodging or special favours.

We cannot allow the company to be compromised in our business dealings and acceptance or giving of favours or gifts can impair objective judgement.

This applies to all employees and failure to company will be considered a serious matter.

Colleagues Must not give gifts to the employees of any supplier or customer, where such gifts could be reasonably construed as an attempt to procure business improperly or as a bribe by any reasonable standard of business ethics or applicable law.

All gratuities or inducements, regardless of the reason, intent or circumstance, offered by suppliers, customers or prospective suppliers and customers must be politely but firmly returned and reported to the Managing Director immediately.



## **10. Whistleblowing Policy**

Country Style employs an external third-party, Navex Global, to operate an anonymous service for colleagues to report any serious concerns which they are uncomfortable raising in any other way.

Examples might be authenticity concerns relating to food safety, quality and safety, fraud, bullying or discrimination.

Colleagues will not suffer any detrimental treatment as a result of raising any genuine concern.

Colleagues can raise a concern in confidence by contacting Navex Global's Expolink free telephone number 24 Hours 7 Days on 0800 196 5856 or through the Navex Global's Expolink Web based reporting system: [countrystyle.ethicspoint.com](http://countrystyle.ethicspoint.com).





## **11. Slavery and Human Trafficking Statement**

### **Introduction**

We are committed to ensuring that there is no slavery or human trafficking in our supply chains.

It is our policy to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place.

### **Due Diligence Processes for Modern Slavery and Human Trafficking**

We monitor ethical standards across the business on a regular basis, both internally and via third party audits. Our sites undergo unannounced SEDEX members Ethical Trade Audits by authorised auditing bodies. Where our suppliers are not on SEDEX, they are required to complete our Ethical Questionnaire (based on the ETI base code and Human Rights Act).

This is also supported by our Ethical Policy, our Equal Opportunities Policy and our Health and Safety Policy.

Country Style is a business partner of Stronger Together – the hidden labour and human trafficking initiative. We have been part of this initiative since 2013, when it was first initiated.

- A Hidden Labour Policy is signed by the Managing Director and trained out to all managers, supervisors and key staff within our structure.
- The policy is on display at all our sites, on the Stronger Together notice boards.
- Senior Managers attend the Stronger Together hidden labour official training.
- A hidden labour action plan – in the event of hidden labour being discovered, comprising of comprehensive details of proceedings following the discovery.
- Compliance by our labour providers – verified by our agency audit that is now designed around the ETI base code and tackling hidden labour principle.
- A proactive reporting system in the event of discovering hidden labour/slavery.
- Training to all key staff with regards to the signs to look out for (alert flags), good practise when dealing with colleagues who may need investigation and general training to all employees in the form of notices, posters, leaflets, videos and induction handbooks.
- Anonymous interview forms in quiet areas, Multilanguage posters and leaflets on notice boards/quiet areas (toilets) and face-to-face interview forms for when suspicions are raised about an individual.



## **Our Supply Chains**

Supply chain security and integrity is a crucial to us. Robust technical and traceability systems ensure that our products are responsibly sourced. We use labour Providers to supply a percentage of our workforce. Each Labour Provider is audited against our own Labour Provider audit standard by our trained Ethical auditors every 6 months. The Labour Provider audit standard is based on the ETI base code, Human Rights Act, SEDEX compliance, The Modern Slavery Act 2015 and our Stronger Together Policies and Procedures.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains, we provide training to our staff. Many of our senior managers have attended the 'Stronger Together – Tackling Modern Slavery in Supply Chains' workshops. The Technical teams who manage our supply chain have been trained in Ethical awareness and the Stronger Together initiatives. Every colleague within the business has received Ethical awareness and Stronger Together training at induction.