



Supplier Code of Conduct

DELIVERING BETTER NUTRITION
FOR EVERY STEP OF LIFE'S JOURNEY



Introduction

The shared mission statement of each of Glanbia's Procurement teams is to "create value for all stakeholders through responsible procurement". This involves sourcing products and services in an ethical, sustainable and socially conscious way.

Our Procurement teams are committed to engaging in responsible sourcing practices that positively impact on people and the planet.

This Supplier Code of Conduct, herein referred to as the Supplier Code, sets out the standards that Glanbia expects from our suppliers, subcontractors and their supply chains respectively. These standards are an integral part of Glanbia's selection and evaluation processes and are grounded in our mission of conducting procurement activities responsibly.

The principles outlined in this document should be viewed as minimum requirements. They are not intended to conflict with or modify the terms of any supplier contract with Glanbia. If a contract with Glanbia and/or applicable law or regulation addresses any area covered by this Supplier Code, suppliers must comply with the contract and/or legal or regulatory requirement.



Business Ethics

At Glanbia, we believe in conducting business in an open, honest and ethical manner, in full compliance with all laws and regulations. We are focused on ensuring that we maintain and promote good governance and high ethical standards. This is essential to the long-term sustainability of the business and our value chain, our strategy execution and our reputation.

Our Anti-Bribery and Corruption Policy outlines Glanbia's zero tolerance for unethical business practices. We expect our suppliers to comply with all applicable laws and regulations that prevent bribery and corruption. Suppliers will not practice or tolerate any form of corruption, extortion or embezzlement or cause Glanbia to violate any applicable anti-bribery or anti-corruption laws or regulations.

Suppliers shall refrain from offering or promising any payment or gift to Glanbia employees, individuals or organisations representing Glanbia;

- To gain any business advantage, favour, financial reward or other benefit;
- To influence the policy of any government; or
- That could bear the appearance of impropriety.

It is the responsibility of suppliers to avoid all conflicts of interest or situations that could appear to give rise to a conflict of interest. When a conflict of interest is identified, suppliers are expected to notify all affected parties.

All of Glanbia's suppliers are expected to implement reasonable safeguards to protect confidential information associated with their relationship with Glanbia, and to use it exclusively as needed to meet Glanbia's business purposes.

Human Rights

Treating people with dignity and respect is core to Glanbia. Our Human Rights Policy is grounded in the UN Guiding Principles on Business and Human Rights. This policy applies to all Glanbia employees, others acting on Glanbia's behalf and our suppliers.

We have zero tolerance for modern slavery in all its forms of slavery and servitude, forced or compulsory labour and human trafficking. Our Modern Slavery Statement outlines the actions we take to address modern slavery risks in our operations and supply chain.

Child Labour

- Suppliers must not employ or benefit from child labour. Minimum age of full-time employment shall not be less than age of completion of compulsory education, in any case not less than 15 years (or the age established by local laws).
- Young people under the age of 18 must not be employed for positions that require hazardous work that may jeopardise their health and/or development.

Forced Labour

- Suppliers shall ensure that all employees are working in voluntary situations and there is no forced, bonded, or involuntary prison labour.
- Suppliers shall not retain employee's original documents, such as identity cards, and shall not engage in deceptive recruitment practices, including requiring employees to pay deposits or recruitment fees (either entirely or partially), as part of the recruitment process.
- Suppliers shall not prevent employees from terminating their employment after reasonable notice or as established by applicable law.

Freedom of Association and Collective Bargaining

- Suppliers shall respect the right of employees to associate freely in employees' organisations of their choice, without interference or negative consequences.
- Suppliers shall respect the rights of employees to collective bargaining, and shall adhere to collective bargaining agreements, where these exist. Suppliers shall, subject to applicable law, participate in any collective bargaining processes in good faith.
- Employee 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 national law, the employer encourages and does not hinder the development of parallel means for independent and free association and bargaining.

Wages

- Employees must be informed about their employment terms and conditions in writing and in an understandable manner before beginning employment.
- Suppliers shall ensure that their employees are fairly compensated. At a minimum, compensation must comply with all applicable wage and hour laws, or industry standards approved on the basis of collective bargaining, whichever is higher.
- Deductions to wages shall only be made in accordance with applicable law or under collective agreement and all workers will be provided with clear and written details of their wages each time they are paid.

Working Hours

- Suppliers must provide for working hours that comply with national laws and industry standards.
- Overtime shall be voluntary and compensated at a premium rate. All overtime related practices will be conducted in accordance with applicable laws and regulatory standards.
- Suppliers shall not seek to avoid obligations to workers under labour or social security laws and regulations arising from the regular employment relationship through the excessive use of fixed term contracts, labour-only contracting, subcontracting, home-working or apprenticeship schemes.



Occupational Health & Safety

Glanbia's primary responsibility is to provide our employees with a safe and healthy environment in which to work. We expect our suppliers to uphold the same standards for their employees including;

- Safe and humane working conditions, access to clean toilet facilities, potable water and sanitary facilities for food storage.
- Adequate training and effective protective equipment to enable the safe conducting of duties.
- Facilities must be constructed and maintained in accordance with applicable laws and regulations.
- Accommodation, where provided, shall be clean, safe and meet the basic needs of workers while respecting their dignity.
- Suppliers will also ensure that there are appropriate exits, procedures and equipment in place to deal with emergency situations.

We encourage our value chain partners to make public disclosures on their safety programme and progress towards the respective targets according to recognised international reporting standards in their annual reports and websites.

Diversity, Equity and Inclusion (DE&I)

Glanbia has defined an ambitious DE&I strategy and we have set out on our journey to build and strengthen our inclusive culture. Our ambition is to foster a culture where everyone feels valued and comfortable being their unique selves within an inclusive environment that is as safe to our mental wellbeing as it is to our physical wellbeing.

We expect our suppliers to be committed to ensuring there is no discrimination in the workplace in terms of;

- hiring, remuneration, overtime, access to training, promotion, termination or retirement based on race, ethnicity, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, marital status, pregnancy status, or age, or any other characteristic protected by applicable laws.

We encourage our partners to make public disclosures on the diversity of governance bodies and employees, the ratio of basic salary and remuneration of women to men according to recognised international reporting standards, and their DE&I programmes and practices in their annual reports and websites.



Sustainability and Environment

Glanbia's vision is to protect the environment through strong responsible stewardship. We're taking action on climate change with SBTi validated Science Based Targets, reducing carbon in our operations and in our supply chain. We're using less water, producing less waste, and joining efforts with partners to achieve packaging circularity and ensure respect for animal welfare. The scale of the challenge means we can't do it alone, so we're developing smart partnerships and working with our suppliers to achieve our ambitions.

- Suppliers shall carry out their operations with respect for the environment, and at a minimum complying with all applicable laws and regulations.
- We encourage suppliers to offer sustainable and lower-carbon alternatives where practicable.
- Suppliers are expected to purchase products that are responsibly and ethically sourced.

We encourage our suppliers to set and validate their Science Based Targets for carbon emissions reduction in Scopes 1, 2 and 3; introduce targets for energy and water consumption, waste reduction, packaging recyclability and recycled content where appropriate.

We encourage our value chain partners to make public disclosures on their sustainability strategies and progress towards the respective targets according to recognised international reporting standards in their annual reports and websites.

Quality

Suppliers shall warrant that all products supplied to Glanbia will comply with the applicable regulations and legislation related to food quality and safety and necessary permits. Suppliers must immediately inform Glanbia about any information or suspicion related to food safety.

We encourage our value chain partners to make public disclosures on their quality programmes and progress towards the respective targets according to recognised international reporting standards in their annual reports and websites.

Assurance Processes

Glanbia requires suppliers, as requested, to engage with our selected partner Ecovadis for assessment (or equivalent assessment as deemed appropriate) in line with our Responsible Procurement programme. We expect our suppliers to comply with this assessment and any necessary corrective measures that may arise as a result.





For more information contact:

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