

Castle Leslie Estate's Supplier Code of Conduct Policy

This Supplier Code of Conduct (Supplier Code) sets out the standards that Castle Leslie Estate expects its suppliers to adopt in relation to their business practices and value chains. It is our policy to conduct our business with honest, integrity and openness.

We have established responsible business priorities identified under the pillars: People, Community and the Environment.

This Supplier Code is designed to provide assurance to our stakeholders of our commitment to maintain a sustainable supply chain where counterparties are accountable for upholding standards in the areas of Business Ethics, Labour practices, Health & Safety, and Environmental Impact.

People

We expect suppliers to treat all employees fairly, honestly and with respect, and at minimum with the following requirements.

Human Rights

- Suppliers shall not permit child labour to be used in any operation connected with Castle Leslie Estate. No child below the age for finishing compulsory schooling, or 15 years of age (whichever is the greater) may be employed by a supplier, subject to International Labour Organisation (ILO) exceptions.
- Where young people under the age of 18 are employed, suppliers will ensure that their work is not likely to be harmful to their health and/or development, including no working under hazardous conditions and ensuring compliance with all applicable laws.
- Suppliers must ensure that all employees have the legal right to work and any migrant workers should be in possession of a valid work permit issued by the relevant authority.
- Suppliers shall not permit the use of forced or involuntary labour of any type (i.e. forced, trafficked, bonded, indentured or involuntary prison labour) and workers shall be free to leave employment without penalty on the provision of reasonable notice.
- The use of physical abuse, verbal or sexual harassment or intimidation of workers shall not be tolerated.
- Suppliers shall not discriminate in hiring, compensation, access to training, promotion, termination or retirement on the grounds of race, caste, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, family status, pregnancy, union membership, political affiliation, disability, or other legally protected class.
- Suppliers shall ensure that their employees are fairly compensated and that, at a minimum, they comply with all applicable wage and hour laws. Deductions to wages shall only be made in accordance with applicable law.
- Suppliers must provide for working hours that comply with national laws and industry standards.
- All overtime shall be voluntary and compensated in accordance with applicable laws.
- 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, sub- contracting, home-working or apprenticeship schemes.

Occupational Health & Safety

- Suppliers shall ensure that all work and related facilities comply with applicable Health & Safety requirements and legislation. All employees are to be appropriately trained in these areas and effective protective training provided to safely carry out their duties.

Community

Our ethics and culture are reflected in the way that we engage with our customers, communities, and suppliers and through our values of fairness, people, service, and individuality.

- In keeping with our commitment to exercising appropriate standards of professionalism and ethical conduct in all business activities, Castle Leslie Estate will not tolerate bribery or corruption in any form, or any breach of its Anti-Bribery Policy.
- Suppliers and business partners are not permitted to directly or indirectly promise, offer or provide any improper advantage to any person or entity, including officials of a government or a government-controlled entity. Castle Leslie Estate's employees are not allowed to accept any such advantage and we expect the same approach in business dealings from our business partners, suppliers and third parties.
- Suppliers are expected to maintain accurate records of their activities and performance that clearly demonstrate compliance with all applicable standards, regulations, and Castle Leslie Estate's requirements.
- Suppliers must disclose any potential conflicts of interest, including those arising from personal relationships, economic interests, or other ties that could materially influence the supplier in the performance of its contractual obligations by reason of the fact that such performance could affect those interests by conferring on them or withholding a substantial benefit.
- Suppliers shall provide Castle Leslie Estate with high-quality products, ingredients and services that meet all applicable quality and food safety standards, and demonstrate that they have robust food-safety and quality-management systems in place. We expect suppliers to immediately report to Castle Leslie Estate if they have any concerns about product safety.
- Suppliers shall take appropriate measures to secure and protect all confidential information related to its relationship with Castle Leslie Estate and use it only for the purpose authorised under contractual agreement. This obligation shall remain in force regardless of the status of the business relationship.

Environment

Castle Leslie Estate is committed to the implementation of proactive measures to help protect and sustain the environment for future generations of our guests and employees.

- Suppliers to Castle Leslie Estate shall carry out operations with care for the environment and at a minimum will comply with all applicable environmental laws and regulations.
- Castle Leslie Estate expects suppliers to support its sustainability commitments through the adoption of good operating practices. In particular, suppliers should seek to optimise their use of natural resources and minimise the generation of waste.
- Suppliers will endeavour to secure their raw materials from fully traceable, sustainable sources and where required, will be members of relevant multi-stakeholder initiatives or reporting platforms that support Castle Leslie Estates' responsible sourcing ambition.

Governance

Suppliers will comply with all applicable laws and with the provisions of this code of conduct.

- Suppliers shall have the appropriate processes and systems in place to do so, including a means for the confidential reporting of concerns about misconduct or unethical behaviour and an appropriate mechanism for addressing any issues identified. Where issues are identified through internal reporting, whistle-blowers will be protected from any negative repercussions.
- Suppliers shall cooperate with Castle Leslie Estate to allow it, or any authorised third party, to conduct audits to verify compliance with these standards or other required certifications. **If** deficiencies are identified, the supplier will take the steps necessary within an acceptable timeframe to correct any deficiency to Castle Leslie Estate's satisfaction. Suppliers shall immediately report any concerns about compliance with legal requirements or any aspect of this code, to their designated point of contact.
- Where a supplier is found to have contravened the requirements set out in this Code, and fails take the steps necessary, within an acceptable timeframe to correct the deficiency, Castle Leslie Estate reserves the right to terminate any associated agreement or business relationship.
- Suppliers must comply fully with all their obligations in relation to all taxes due within the jurisdictions in which they operate. Suppliers must not participate in tax evasion or facilitate tax evasion by others.

Grievance

Suppliers must establish processes or mechanisms by which workers and stakeholders can raise issues of concern without fear of retaliation or negative impact.

Reporting Violations

Suppliers who become aware of violations (or risk of violation) of the Castle Leslie Estate Supplier Code of Conduct, guidelines, principles, and policies and/or of applicable laws and regulations are invited to raise their concerns to their contact person within Castle Leslie Estate with which they have a business relationship. Suppliers can report violations to conduct@castleleslie.com

A Supplier's relationship with Castle Leslie Estate will not be affected by a report of potential misconduct made in good faith.

This code of conduct is endorsed by the senior management team.