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### About us

Adnams was founded in Southwold on the Suffolk coast in 1872. We are brewers, distillers, wine merchants, retailers, publicans, and hoteliers. We craft award-winning and well-loved premium beers, spirits, and wines, and our stores, hotels, pubs, and inns reflect our distinct personality. You can find Adnams products in our stores, our managed properties, partner pubs and in outlets nationwide and overseas. We are proud of our heritage, and our values set us apart.

Although fiercely independent, we work with a vast range of suppliers, whose own work spans social issues, as well as climate concerns. We must all commit to a sustainable future; one in which progress is balanced with care, thought and consideration for our environment and our communities.

ESG is a way of measuring the impact a business has on society and the environment and how robust its leadership is. Its three components are environmental, social and governance. A clear and evolving ESG strategy shows a business is doing the right thing in the right way. We are a proud ethical business with a strong ESG history, having always put the interests of people and planet first. We encourage our suppliers to do the same wherever possible.





### About this code

Corporate integrity, responsible sourcing and the safety and wellbeing of workers in our supply chain is of paramount importance to Adnams. Having a 150-year history of producing quality products, many of our supply partners are long-standing and share our values. Where possible we use local suppliers, which supports our local economy and reduces our climate footprint. These core principles are reflected in this document, Adnams' Supplier Code of Conduct (Code), which establishes the minimum standards that must be met by those that supply goods or provide services to Adnams. It has been developed to cover all suppliers, irrespective of size.

### Adnams Suppliers...

Agree to comply with the requirements in this Code

Ensure that their workers comply with this Code

Have appropriate systems in place to ensure continuous compliance with this Code

Can demonstrate compliance with this Code

Any breach of this Code will allow Adnams to terminate its relationship with a Supplier with immediate effect





# Environmental responsibility

Sustainability is at the heart of what we do. It guides our decisions and helps us do the right thing. We want to continue making a positive difference, and we believe it is vital to our long-term success that our Suppliers echo this view. We all need to take urgent action to combat climate change and its impacts in line with the United Nations Sustainable Development Goals.

#### Operations & Production

Adnams Suppliers must ensure that their operations comply with all applicable environmental laws, including laws and international treaties relating to (but not limited to) waste disposal, emissions, discharges, and the handling of hazardous and toxic materials.

In addition, the goods they manufacture (including any components), and any packaging materials used, must also comply with all applicable environmental laws and treaties.

### Process Management:

Our Suppliers must have suitable environmental management systems in place, for controlling any environmental risks.

### As a minimum, such systems should include:

- 1. An assessment of the environmental impact of all historical, current, and likely future operations
- 2. Steps to continuously improve environmental performance, reduce pollution, emissions, and waste
- 3. Measures to reduce the use of all raw materials, energy, and supplies
- 4. Environmental awareness training for employees and Representatives

### **Action on Climate Change**

Adnams is working towards achieving at least net zero by 2030. We need all our Suppliers and their Representatives to acknowledge this aim and contribute towards efforts to limit global temperature increase to 1.5 degrees Celsius above pre-industrial levels.

### We encourage all of our Suppliers to do the following:

- 1. Measure, manage, and report their total emissions
- 2. Develop and implement a plan of continual improvement with the objective of reducing their total emissions as rapidly as possible

This may be a formal requirement for certain Suppliers.



# Social responsibility

### Workforce practices

We acknowledge that our Suppliers are based all over the world in varying jurisdictions. When carrying out their activities they must, as a minimum, comply with the Ethical Trading Initiative's Base Code and all applicable laws and regulations in the jurisdictions in which they operate.

### Slavery, human trafficking, and child labour

Our Suppliers must comply with all anti-slavery and human trafficking laws, statutes, regulations, and codes in force (such as the Modern Slavery Act 2015), in all parts of their supply chain.

### Adnams Suppliers shall not support, engage in, or require:

- Forced labour
- · Child labour
- Bonded labour
- Indentured labour
- Prison labour
- Any other harsh or inhumane treatment.

Our Suppliers must be able to demonstrate that they are actively taking steps to prevent modern slavery in their operations and supply chains.

### **Human rights**

Adnams requires all its Suppliers to comply with internationally recognised human rights as well as the principles concerning fundamental rights.

As a minimum, this includes those expressed in:

• The International Bill of Human Rights

#### **AND**

 The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work



# Social responsibility

#### **Equal opportunities**

Adnams is an equal opportunities employer. Its Suppliers shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any employment practice based on race, caste, colour, national origin, gender, gender identity, sexual orientation, religion, age, marital or pregnancy status, disability, union membership or political affiliation, or any other characteristic, other than the worker's ability to perform the job subject to any accommodations required or permitted by law.

We measure diversity within our supply chain and encourage Suppliers to undertake initiatives to promote the career progression of women in business. We also expect to see the fair representation of any communities where our Suppliers operate.

### Freedom of association and collective bargaining

Our Suppliers shall respect, and not interfere with the right of workers to decide whether to lawfully associate with groups of their choice. This includes the right to form or join trade unions and to engage in collective bargaining.

### Working environment

Adnams Suppliers must provide a safe, healthy, and sanitary working environment. They should also comply with UK health and safety laws and any other relevant laws where they operate.

This includes, but is not limited to:

- Implementing general and relevant industry-specific procedures and safeguards to prevent workplace hazards and work-related accidents and injuries
- Where such hazards cannot be adequately prevented or controlled, our Suppliers must provide their workers with appropriate personal protective equipment.

Working hours of workers must not be excessive and our Suppliers shall ensure that the requirements of the Ethical Trading Initiative Base Code are met.

### Wages and Remuneration

Adnams is a Living Wage Employer, accredited by the Living Wage Foundation, meaning it pays its staff the real living wage; a wage that as a minimum meets the everyday needs of its workers. We expect our Suppliers to do the same.

As a minimum, Suppliers must compensate all workers with wages, including overtime premiums, and benefits that at a minimum meet the higher of the minimum wage and benefits established by:

- a) national legal standards,
- b) collective agreements,
- c) industry standards,
- d) and an amount sufficient to cover basic living requirements.



#### Procuring & Managing Representatives

Adnams Suppliers must carry out appropriate due diligence on any prospective Representatives that will form part of Adnams' upstream supply chain. As a minimum, such due diligence must include the following:

- Appropriate investigations into prospective Representatives' stance, public statements and actions on human rights, treatment of workers, bribery, ethical behaviour and environmental outlook
- Risk assessments for countries from which materials, components or finished goods are sourced
- Any prospective Representative's ability to meet the requirements and principles that are covered in this Code

In dealings with their own Representatives, Adnams Suppliers must:

- Ensure any agreements include provisions that require them to comply with the
  applicable provisions of this Code; having due regard to the risk profile of the
  transaction, the Representative's ability to comply with those provisions and the
  consequences should they fail to meet those requirements
- Ensure they have measures in place to monitor that their Representatives are complying with those provisions and that they have systems in place to address any deficiencies or breaches of those requirements
- Pay its Representatives promptly, with the maximum payment period being 60 days.

### Transparency

Adnams Suppliers must be transparent as to the identity of their Representatives to ensure that Adnams is able to carry out its own due diligence on those Representatives and their compliance with this Code.



### **Bribery and Corruption**

Adnams Suppliers must comply with all applicable laws, statutes, codes, and regulations relating to the prevention of bribery and corruption (including but not limited to the Bribery Act 2010).

To that end, our Suppliers must not accept, offer, promise, pay, permit, or authorise:

- Bribes, facilitation payments, kickbacks, or illegal political contributions
- Money, goods, services, entertainment, employment, contracts, or other things of value, to obtain or retain improper advantage
- Any other unlawful or improper payments or benefits

### **Unfair Business Practices**

Adnams Suppliers must comply with all applicable competition laws, including but not limited to The Competition Act 1998.

This includes (but is not limited to) practices relating to:

- Teaming and information sharing with competitors
- Price fixing and rigging bids



### Data protection and information security

When processing any personal data on behalf of Adnams, Suppliers are required to comply with all data protection laws and requirements (including the UK GDPR).

### Our Suppliers shall:

- Have appropriate measures in place to protect the integrity and confidentiality of information held on their systems (both physical and online/electronic)
- This includes information belonging to or supplied by Adnams
- Ensure that there is no unauthorised access of this information by third parties, including their own Representatives

Adnams Suppliers are required to implement a system of training for their workers to ensure that they are aware of the provisions of this Code.

• Suppliers should keep a record of all training offered and completed by its workers and make a copy of that record available to Adnams on request



### Certifying compliance and audit

### What do you have to do?

Suppliers must provide that following written confirmation to Adnams at least once per year:

- 1. That they have appropriate systems in place to monitor compliance with this Code
- 2. That they can comply with this Code for the duration of their relationship with Adnams

In addition to any written confirmation, Adnams may conduct audits to verify the Supplier's compliance with this Code.

### Self-monitoring and reporting breaches

Suppliers must monitor their compliance with the Code and shall report any breaches (actual or suspected) of this Code as soon as possible

Suppliers shall not retaliate or take disciplinary action against any worker that has, in good faith, reported breaches of this Code or questionable behaviour, or who has sought advice regarding this Code.



### Breach, remediation, and termination

#### **Breaches & Remediation**

Should we become aware of a breach of this Code by a Supplier or their workers, we may either:

Immediately terminate our business relationship with the Supplier (including any contracts)

### **OR**

 Require a Supplier to produce a remediation plan specifying the actions that they will take that will lead to compliance with the Code. This must be presented to Adnams within 14 days of any request.

### **Termination of business relationship**

If a Supplier fails to produce a remediation plan within this timeframe or fails to implement it within a reasonable time, Adnams may immediately terminate its business relationship with the Supplier (including any contracts).

### **Breaches of Code by a Representative**

Where Adnams becomes aware that a Supplier's Representative has been involved in an incident (or incidents) that would constitute a breach of any of the requirements under this Code, were they bound directly by it, Adnams may either:

• Terminate its business relationship with the Supplier (including any contracts)

#### OR

 Require the Supplier to remedy that incident (or incidents) with that Representative

If a Supplier is not able to remedy such incident with their Representative within a reasonable time, Adnams may immediately terminate its business relationship with the Supplier (including any contracts).

### **Priority of Standards**

Where there are competing standards, they shall be addressed as follows:

If there is a conflict between any applicable laws or regulations, the provisions of an agreement with Adnams, and the provisions of this Code, the following applies:

· Our Suppliers must meet the most stringent standard.

If there is a conflict between the provisions of an agreement with Adnams, and the provisions of this Code, the following applies:

• Our Suppliers must meet the more stringent standard.



# Definitions and Scope

### In this code:

Supplier means a company, partnership or individual that provides goods or services to Adnams.

Worker means any individual the Supplier employs, hires, engages, or otherwise uses to conduct its business.

Representative means the Supplier's suppliers, vendors, agents, and subcontractors who are also involved in the Adnams supply chain.

