

DAWN MEATS GROUP ETHICAL TRADE POLICY (the “Policy”)

At Dawn Meats Group, including Dunbia, a division of Dawn Meats, (together known as “the Company”), are a supplier of meat products to Ireland, the United Kingdom, Europe and other international markets, we understand the importance of employing responsible ethical trading practices, both within our own operations and in our supply chains. The Directors and the entire Management Team support a policy of responsible ethical trading. The Company is committed to the development of a positive policy that supports achievement of the objectives below.

Purpose

“Providing consistent quality meat products from sustainable sources to support our rural communities, human health and nature’s ecosystems.”

Goal

To ensure our sites and supply chains are in compliance with the requirements of the Ethical Trade Initiative Base Code, where feasible, and allowing for the fact that any changes in long term practices in our supply chain may take some time and require broader industry collaboration.

Our Vision

- Continuous process innovation and investment to deliver safe and consistent quality products to meet and exceed consumer expectations
- To be our new and existing customers’ key partner of choice through sustainable long-term relationships
- Challenging and supporting our people to realise their full potential as part of a high-performance team in a safe working environment
- Adding value with our farmer suppliers through proactive communication and innovative agricultural programmes
- Continuous adoption of innovative technology to enhance and deliver sustainability

Our Values

- We are Customer-Focused
- We are committed to a Sustainable Supply Base
- We Respect, Empower and Engage with Our People
- We are dedicated to Excellence and Continuous Improvement
- We act Responsibly

Scope

This Policy governs all of our sites in Ireland and the UK, and our supply chains. This Policy should be observed by the Company, senior management and relevant team members.

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Benefits

The Company understands the following benefits of embracing responsible ethical trading practices:

- Positive impact on society and in our supply chains.
- Risk Management: Civil cases have been brought against the directors of a number of UK companies who were knowingly involved in modern slavery, and the maximum sentence for offences involving modern slavery is now 14-25 years.
- Knowledge and understanding of the risks in different markets and countries allows us to source materials and labour while taking steps to mitigate modern slavery and unethical trading risks.
- Association with modern slavery, infringement of human rights or unethical trading practices, can seriously damage a company's reputation (brand destruction), negatively impacting market share, customer and employee retention and financial position.
- Attraction and retention of talent.
- Customer retention and attraction - building strategic and trusted relationships with our customers through increased transparency and collaboration, working to solve common problems.
- Reputation: Socially responsible and ethical businesses have a stronger reputation with consumers. Reputation for "Doing the Right Thing".
- Maintaining and enhancing our reputation as an ethically responsible business may bring a collection of skills, alternative perspectives, unique ways of reasoning and different approaches to problem solving.

Policy Principles

- The HR Director has overall responsibility for formulating this Policy in conjunction with the relevant Directors of the business units.
- The HR Director will oversee the regular review of the Policy, at least annually.
- The HR Director is responsible for communicating the Policy to all relevant levels of the organisation, in conjunction with Directors of the business units and the Heads of departments. The HR Director is also responsible for ensuring that the Policy is fairly and consistently managed throughout the Company.
- The Company will endeavour to involve relevant team members in the development, review and monitoring of our action plans.
- The Company will not discriminate by race, caste, religion, age, nationality, social or ethnic origin, sexual orientation, gender, identity or expression, civil status, family status, pregnancy, union membership, political affiliation, disability or other legally protected class.
- The Company is committed to the principle of non-discrimination at every stage of human resources process, in particular in the recruitment, training, promotion and career development of team members.
- The Company has a diverse workforce and we endeavour to ensure that this is reflected at all levels of our organisation. In recruitment and promotion, the most appropriate person for the job will be awarded the job.
- We understand, appreciate and value all team members' sets of skills and abilities, and utilise their talents for the best results.
- The Company will encourage an environment where people from all backgrounds and experiences feel valued and appreciated.
- All team members will be given equal opportunity for appropriate and business critical training and will have the right tools to perform their job properly.
- Management will deal promptly with any complaints or observations of discrimination and harassment.
- The Company will ensure team members conduct themselves in a manner consistent with company mission, values, and culture.
- The Company has a confidential whistleblowing line for team members that wish to raise issues around discrimination, bullying harassment or other issues.

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Appendix A – Objectives

The Company's Ethical Trade objectives are as detailed below. The HR Director will be responsible for setting and reviewing the objectives and ensuring they are reviewed at least annually. The HR Director will cascade these objectives to relevant HR and site management personnel.

Objectives

- Embed the internal Ethical Trade Committee and Governance Structure.
- Work within the ETI base code principles as far as possible and where feasible.
- Engage our colleagues across the business to raise awareness of the principles of the ETI Base Code and roll out training for key personnel.
- Effectively challenge and fight Modern Slavery within our business and supply chains.
- Maintain and enhance our reputation as an ethically responsible business.
- Continuously improve supply chain transparency and traceability.
- Risk assess our all sites and our supply base.
- Put measures in place to mitigate and eliminate identified risks as soon as possible.
- Develop and build on the Supply Chain Risk Management Model.
- Establish a Tendering Documentation Suite and a new risk-managed approach to supplier selection.
- Establish a compulsory Pre-Qualification Questionnaire process for all suppliers to result in uploading of key supplier data onto the Sedex Platform.
- All suppliers to adhere to the expectations outlined in our Supplier Code of Conduct.
- Achieve positive results on all SMETA and Supplier Workplace Accountability Audits.
- Collaborate with customers, stakeholders, governance bodies and supplier peer groups on key themes and to promote and integrate best practice.

Monitoring and Tracking

The Company is committed to tracking progress across the business primarily via audit outcomes and will expand and build upon existing governance structures where appropriate.

Metrics and Targets

The Company will charge the HR Director with reporting progress annually to the Sustainability Executive, supported by the Ethical Trade Committee and relevant site personnel.

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Appendix B – Key Organisations Governing Ethical Trade

- The International Labour Organisation (ILO) is an agency of the UN. It promotes rights at work, decent employment opportunities, enhances social protection and strengthens dialogue on work-related issues. ILO Standards provide an international benchmark for workers’ rights.
- The Ethical Trade Initiative (ETI) is a code of best practice derived from the ILO and sets out 9 principles for companies to follow. ETI membership in 2019 comprised over 90 companies, collectively reaching nearly ten million workers across the globe.
- The Supplier Ethical Data Exchange (Sedex) is the largest collaborative platform for sharing information and improving standards. Sedex is the certification or audit standard which proves compliance with the ILO requirements and ETI Codes.
 - Our customers are Sedex members and follow the ETI base code.
 - Our customers require their suppliers to undertake Sedex Members Ethical Trade Audits (SMETA), which are shared on the Sedex platform and may be viewed by others.
 - Buyer A membership allows organisations to view and run reports on their supply chain.
 - Buyer/supplier AB membership allows organisations to view and run reports on their supply chain and share information with customers.
 - SMETA audits are derived from the ETI Base code. One SMETA audit can be made visible to multiple customers thus cutting down on the need for multiple audits.
 - There is a component on the Sedex platform for supply chain monitoring and risk rating.
- The Food Network for Ethical Trade (FNET) is a supplier-led initiative aiming to use the collective leverage of suppliers and retailers for positive change in food supply chain working conditions by providing guidance, resources, training and opportunities for collaboration.

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Appendix C – Company Governance Structure

Key Responsibilities of the Ethical Trade Committee:

- Review and update the Ethical Trade Strategy and Policies (Supplier Code Conduct, Modern Slavery Statement, etc.) annually.
- Review progress against objectives and initiatives at quarterly meetings.
- Identify and agree which objectives and actions should be prioritized.
- Report to the Sustainability Executive on quarterly.



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