



**2026**

## **SUPPLIER CODE OF CONDUCT**

Dawn Meats Group (“Dawn”) and Dunbia, a division of Dawn Meats Group, are committed to supporting the human rights, dignity and wellbeing of our employees, and those in our sphere of influence, including the supply chain and the communities where we operate. We are very aware of our responsibility as a business to respect and defend human rights.

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The Dawn and Dunbia company code of practice and ethics is designed to uphold and communicate our mission, vision and values. Core to this policy is doing the right thing. It is also fundamental that the company and all our team members comply with both the spirit and the letter of any legal, ethical and moral frameworks, by which the company is bound.

The company has a clear commitment to conduct business responsibly, ethically and in compliance with all applicable laws in the jurisdictions in which we operate, and we expect all team members to reflect this commitment in their behaviours and interaction with others. The company competes successfully in today’s business environment and is committed to do so in full compliance with all applicable antitrust, competition and fair dealing laws.

Dawn Meats is committed to remain a socially responsible business and we encourage all team members to become actively involved in the local communities in which we operate. The company has an established commitment to drive excellence and bring us on a path to being ‘Europe’s most sustainable meat company’. All team members are expected to support progress towards this goal, to assist continuous improvement and enhance the company’s reputation and that of its team members.

Dawn and Dunbia have a fundamental commitment to acting ethically and with integrity in all business relationships. This commitment is extended to social and environmental responsibilities and our mission, vision, values and objectives are set out in our 4th Corporate Sustainability Update 2023.

The evolving nature of the business and Human Rights Agenda means that we are continually learning and striving to identify and action best practice by working in collaboration with our supply chain partners and customers. Key drivers are transparency, collaboration, engagement and trust.

At Dawn and Dunbia our purpose is to “provide consistent quality meat products from sustainable sources to support our rural communities, human health and nature’s ecosystem”. We will only achieve this aspiration, in partnership with our suppliers of livestock, other goods and services.

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Our Supplier Code of Conduct sets out our expectations for producers, farmers, manufacturers, processors, and all those who supply goods and services to Dawn and Dunbia.

The United Nations (UN) Global Compact' principles and the UN Guiding Principles on Business and Human Rights reflected in this Supplier Code of Conduct are embedded in our overall approach to sustainable business practices and are aligned to suite of business policies in Appendix One.

The Human Rights Policy principles are derived from:

- The Universal Declaration of Human Rights.
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- Children's Rights and Business Principles
- UN Women's Empowerment Principles.
- The UN Convention Against Corruption
- The UK Modern Slavery Act (2015)
- UN Sustainable Development Goals.

### **Purpose and Scope**

This Supplier Code of Conduct sets out the minimum standards and expectations and we encourage all suppliers to go beyond these requirements. This code of conduct applies to all internal and external suppliers of goods and services to Dawn and Dunbia. It is in addition to existing quality, technical and commercial agreements. It is expected that suppliers apply similar levels of compliance to their own suppliers and approved sub-contractors.

### **Supplier Code of Conduct Requirements and Expectations**

#### **Obey the Law**

- Acquire and maintain knowledge and understanding of relevant laws applicable to your business, the industry and jurisdictions in which you operate.
- Regard legal requirements as a minimum standard and seek to go beyond this minimum standard to further the social, environmental and ethical sustainable sourcing agenda.
- Report to Dawn and Dunbia, any material issues related to the goods and /or serviced supplied, as soon as you become aware of such issues.

#### **Business Conduct Standards**

- Dawn and Dunbia have always set high standards for the way we conduct business. We expect our staff to conduct themselves with integrity, impartiality, honesty and transparency. It is our expectation that supply chain partners display these values in their business activities.
- Fulfil business obligations and work with Dawn and Dunbia to manage unforeseen events and situations effectively.
- Compete fairly and ethically for Dawn's and Dunbia's business.
- Maintain accurate and authentic records of business transactions.
- Avoid and mitigate against any situations which may negatively impact Dawn's and Dunbia's reputation and/or business interests.
- Upon request from Dawn and/or Dunbia, disclose information on the known origins of materials and ingredients supplied, to enable full traceability and supply chain transparency, as far as possible. At a minimum, we expect suppliers to know the country of origin of a material and/or ingredient, to have carried out an assessment of the known human rights, ethical and modern slavery risks associated with those countries, and to establish a strategy to mitigate against these risks.

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### Business Ethics

- Dawn and Dunbia will not tolerate bribery or corruption in any form, or any breach of our Anti-Bribery and Conflict of Interest Policy.
- Suppliers must disclose any personal relationships, economic interest or other ties to their business held by an employee or contractor with Dawn and/or Dunbia.
- Suppliers to Dawn and/or Dunbia must meet all applicable quality and food safety standards and demonstrate that they have robust food-safety and quality-management systems in place.
- Suppliers shall take appropriate measures to secure and protect all confidential information related to its relationship with Dawn and Dunbia 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.

### Human Rights

We expect suppliers to treat all employees fairly, honestly and with respect, in full compliance with the following, requirements. For clarity, we have set out below our expectations for Dawn and Dunbia suppliers:

- Dawn and Dunbia respect different cultures and values in countries in which we operate and source our raw materials, but do not compromise on the basic requirements on the Rights of the Child. It is mandatory that suppliers shall not permit child labour to be used in any operation connected with Dawn and/or Dunbia.
- 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. The supplier should invest in a remediation system in the event of an underage worker being employed, to assist in their return to school or vocational programme or any other solution that can cater for the child's best interest.
- Under no circumstances tolerate, engage in or support human trafficking or forced labour as defined by the International Labour Organisation.
- All employees must have the legal right to work and any migrant workers, including but not limited to refugees, asylum seekers and those with subsidiary protection, should be in possession of a valid work permit issued by the relevant authority.
- Employees are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.
- We expect all our suppliers to take appropriate steps to identify, address and avoid Modern Slavery within their direct operations and supply chains. The supplier must ensure that goods provided to Dawn and Dunbia are not tainted by slavery, human trafficking or exploitation.
- The use of forced or involuntary labour of any type is prohibited. (i.e. forced, trafficked, bonded, indentured or involuntary prison labour).
- The use of physical abuse, verbal or sexual harassment or intimidation of workers shall be prohibited by suppliers.
- The rights of employees to join or refrain from joining worker organisations and will allow workplace access for such organisations to facilitate their representative functions will be respected. Respect the rights of employees to organise and bargain collectively.
- There will be no discrimination 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, identity or expression, marital status, family status, pregnancy, union membership, political affiliation, disability or other legally protected class.
- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be enough to meet the basic needs and to provide some discretionary income.
- 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. For the avoidance of doubt,

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“understandable information” includes written, verbal, visual and pictorial, translated into the workers’ native languages where there is no, reduced or inadequate comprehension of the primary language (e.g. English) used by the business.

- Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.
- Suppliers will have a written disciplinary procedure outlining the steps for progressive discipline to correct misconduct or unsatisfactory performance inclusive of an appeal process.
- Suppliers will have a written grievance procedure so that grievances can be dealt with fairly, consistently and efficiently. Additionally, the supplier should invest in a ‘whistleblower’ service that enables employees and third party suppliers to report malpractice, unlawful or unethical behaviour within the workplace anonymously. This can be a telephone-based service which is complemented by other reporting options.
- Working hours must comply with national laws and industry standards. Total worked hours shall not exceed the maximum allowable under local law.
- All overtime shall be voluntary and compensated in accordance with local law.
- Suppliers shall not seek to avoid obligations to workers under labour or social security laws and regulations arising from the regular employment relationships.
- Suppliers must ensure that where Labour Providers are used, they should be legally registered. Labour agencies should only supply workers registered with them. Relationships with Labour Providers should be covered by a Service Level Agreement which complies with local legal requirements.
- Workers should not pay any fees to gain employment.

#### **Health & Safety**

- 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 environments.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage, shall be provided.

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