



SUPPLIER CODE OF CONDUCT

Updated: Jul 2026



ABOUT US

Avara Foods is one of Britain's leading food businesses, supplying chicken and turkey to the retail and foodservice sectors. Every day, we deliver great quality food to an impressive range of customers across the UK and Europe.

We own and manage every part of our supply chain; from feed mills and farms, through to processing, packing and distribution. We do it by focusing on high standards, great service and a culture where our people make the difference.

Our Values are what we stand for, what we believe in and what others can depend on us to uphold, whatever the situation. They reflect how our colleagues see us now, but also what we want to be in the future.

DOCUMENT PURPOSE

Avara Foods seek to build lasting relationships with our suppliers. The purpose of this Supplier Code of Conduct is to clearly communicate our commitment to the principles and ethical values we want to uphold and to reinforce honest conduct and ethical behaviour. This code sets clear expectations of Avara suppliers in the areas of:

- **Human rights**
- **Ethical trading, environment and conduct**
- **Compliance of the code**

This code will enforce the Ethical Trading Initiative (ETi) Base Code which is a private code agreed among ETI business, NGO and Trade Union members. It draws on the conventions of the International Labour Organisation (ILO).



SECTION 1: HUMAN RIGHTS

This section is in line with the ETi Base Code

EMPLOYMENT AND HUMAN RIGHTS

We expect all our suppliers to have internal fair employment policies and practices. They must comply with applicable local employment laws and regulations to ensure that their employees are equally valued, supported, respected and treated fairly, with dignity within a safe working environment. As a supplier to Avara you have the responsibility to ensure there is no slavery or forced, bonded or involuntary prison labour within your organisation and supply chain.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

We expect our suppliers to recognise and support the principle that that workers, without distinction, to have the right to join or form trade unions of their choosing and to bargain collectively without discrimination.

WORKING CONDITIONS ARE SAFE AND HYGIENIC

We expect our suppliers to provide a safe and hygienic working environment. Steps should be taken through regular risk assessments, policies and practices to prevent accidents and injury to health associated with or occurring in the course of work. Steps should be taken to identify hazards and minimise causes of incidents in the working environment. Suppliers must give workers regular and recorded health and safety training and provide first aid supplies and ensure adequate safety equipment is provided.

INTERNATIONAL STANDARDS AND FRAMEWORKS

At Avara Foods, we are committed to aligning our practices and expectations with internationally recognised principles and frameworks. We expect our suppliers to adopt these standards to ensure responsible and ethical practices throughout the supply chain. These include, but are not limited to:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- International Labour Organisation (ILO) Conventions
- Ethical Trade Initiative (ETI) Base Code

By adhering to these global principles, we aim to uphold human rights, protect vulnerable groups, and ensure fair treatment for all workers.

In high-risk areas, we expect suppliers to take proactive measures to meet these standards, including:

- **Supply Chain Mapping:** Suppliers must map their supply chains to identify and mitigate risks related to human rights violations, environmental harm, or unethical practices. This process should include an assessment of all direct and indirect suppliers, ensuring transparency in sourcing practices.
- **Stakeholder Engagement:** Suppliers must engage with relevant stakeholders, including workers, local communities, and rights groups, to identify risks and implement measures that mitigate potential impacts. Stakeholder feedback should form part of continuous improvement processes.

CHILD LABOUR SHALL NOT BE USED

Our suppliers should ensure they work in line with our Child Remediation Policy at all times. They should not, under any circumstances, employ any person under the legal working age, or benefit in any way in their supply chain from the use of under-age workers.

LIVING WAGES ARE PAID

We expect our suppliers to pay their workers, at a minimum, national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs and to provide discretionary income.

WORKING HOURS ARE NOT EXCESSIVE

Working hours for our suppliers' workers must comply with national laws and collective agreements. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. All over time should be voluntary and always compensated at no less than 125% of the regular pay rate. Working hours may exceed 60 hours in any 7 day period but only in exceptional circumstances set out in 6.5 of the ETi Base Code.

NO DISCRIMINATION IS PRACTISED

Our suppliers must not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

RESPONSIBLE RECRUITMENT PRACTICES

Avara Foods is committed to the fair treatment of all workers, including those facing additional vulnerabilities, such as migrant workers.

Suppliers are required to:

- **Legal Right to Work:** Ensure all workers have valid work permissions and documentation, in line with national legal requirements.
- **Prohibition of Recruitment Fees:** Suppliers must not charge workers any fees or costs during the recruitment or employment process. Workers must not be required to provide financial deposits or guarantees.
- **Protection from Exploitation:** Suppliers must take steps to protect migrant workers from unfair treatment, forced labour, or discrimination. This includes safeguarding freedom of movement and ensuring access to personal identification documents.

REGULAR EMPLOYMENT IS PROVIDED

To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. We expect our suppliers to comply with this and not to use agency contracts for long term positions or employ people on zero hours contracts.

NO HARSH OR INHUMANE TREATMENT IS ALLOWED

Avara has robust policies, processes and management in place to prevent bullying, physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. We expect our suppliers to take the same approach.

- **Anti-Bullying Policies:** Suppliers must implement clear policies to prevent bullying, harassment, or any form of discrimination in the workplace. These policies should align with the latest UK legal standards, including the Worker Protection Bill.
- **Training and Awareness:** Suppliers must train employees on acceptable workplace behaviours, emphasizing inclusion and respect.
- **Reporting Mechanisms:** Suppliers must establish safe and anonymous channels for employees to report bullying or harassment, ensuring reports are investigated promptly and appropriately.
- **Zero Retaliation:** Suppliers must protect individuals who report bullying or harassment from any form of retaliation.

GRIEVANCE MECHANISMS

Avara Foods expects all suppliers to establish clear, accessible, and confidential grievance mechanisms for employees throughout the supply chain. These mechanisms should:

- **Confidential Reporting:** Allow employees to raise grievances confidentially, ensuring that their concerns are addressed without fear of exposure or retaliation.
- **Timely and Fair Resolution:** Ensure grievances are dealt with promptly and fairly, with a clear process for investigation and resolution.
- **Regular Review:** Be regularly reviewed to ensure that the grievance mechanisms remain effective and responsive to the needs of employees.

WHISTLEBLOW PROTECTION

To promote integrity and transparency, Avara Foods requires suppliers to implement effective, confidential mechanisms for reporting misconduct or breaches of the Code without fear of retaliation. These mechanisms must:

- **Confidential Reporting:** Provide secure, clear channels for reporting concerns (e.g., dedicated phone lines, email addresses, online platforms) that protect the anonymity and confidentiality of the reporting individuals.
- **Non-Retaliation Policy:** Ensure that whistleblowers are fully protected from any form of intimidation, harassment, or adverse consequences that may arise from making reports in good faith.
- **Addressing Genuine Misconduct:** Suppliers must have a clear process for investigating and addressing genuine misconduct or breaches of the Code, ensuring that corrective actions are taken as required.
- **Continuous Monitoring and Improvement:** Avara Foods reserves the right to review and support suppliers in strengthening their whistleblower systems to ensure they are both effective and robust in addressing misconduct.



SECTION 2: ETHICAL TRADING, ENVIRONMENT & CONDUCT

ENVIRONMENT

Avara Foods is committed to conduct business activities in a manner that is environmentally responsible and sustainable. We expect our suppliers to comply with all applicable environmental regulations and work consistently to minimise their environmental footprint and prevent pollution. Suppliers must be working towards:

- minimising pollution to air, water and soil
- prevention of deforestation
- minimising waste
- CO2 reduction
- Water usage reduction
- Sustainable use of plastics with targets to remove single use plastics

Waste water, hazardous material, chemicals and substances used by suppliers must be responsibly disposed of to protect the environment.

Suppliers are expected to support Avara Foods' sustainability commitments by providing accurate, timely and complete environmental data upon request. This includes, but is not limited to, Scope 1, Scope 2 and relevant Scope 3 greenhouse gas emissions, energy consumption, water usage, waste generation and resource efficiency metrics.

SECTION 2: ETHICAL TRADING, ENVIRONMENT & CONDUCT

Suppliers must also declare whether they supply, source or utilise any high-risk commodities associated with environmental or social impacts (e.g. soy, palm oil, timber, cocoa, or other commodities linked to deforestation or land-use change). Where applicable, suppliers are expected to demonstrate appropriate due diligence, traceability and risk mitigation measures to ensure these materials are sourced responsibly and in line with recognised industry standards.

Suppliers must have appropriate systems, processes and controls in place to ensure the accuracy, completeness and traceability of all sustainability data provided. Data should be aligned, where possible, to recognised standards and methodologies.

Suppliers are expected to maintain and demonstrate continuous improvement in their environmental performance, including:

- Active management and reduction of greenhouse gas emissions
- Energy use and environmental impacts across their operations and supply chains.

Where relevant, suppliers shall assess and manage their impacts and dependencies on natural resources, including water, land, and biodiversity, and implement appropriate controls to prevent adverse environmental impacts.

Where applicable, suppliers should hold, or be working towards, recognised environmental and energy management certifications such as ISO 14001 (Environmental Management Systems) and ISO 50001 (Energy Management Systems), or equivalent standards. Suppliers shall identify and assess climate-related risks to their operations and service delivery (e.g. flooding, water scarcity, extreme weather) and implement proportionate measures to ensure resilience and continuity of service. This can align with ISO14090 (Adaptation to Climate Change).

Avara Foods is committed to improving energy performance in line with ISO 50001 and seeks to work collaboratively with its suppliers to support this objective.

Suppliers are encouraged to:

- Consider energy efficiency in the design, sourcing, and delivery of goods and services.
- Share relevant information on energy performance (such as energy consumption, efficiency ratings, or improvement opportunities) where available.
- Support Avara Foods in identifying opportunities to reduce energy use and improve efficiency across products and services.
- Consider applicable energy-related legislation and good industry practices.

Suppliers must be able to evidence their environmental policies, targets, performance and progress upon request and participate in any reasonable sustainability assessments, audits or reporting requirements required by Avara Foods or its customers.

Failure to provide adequate sustainability data or demonstrate appropriate environmental management practices may be considered a breach of supplier requirements and could impact ongoing or future commercial relationships.

SECTION 2: ETHICAL TRADING, ENVIRONMENT & CONDUCT

Where suppliers are not currently able to provide the required sustainability data, they are expected to proactively engage with Avara Foods to develop the necessary capability, systems and processes to do so within an agreed and reasonable timeframe. Suppliers shall identify and assess climate-related risks to their operations and service delivery (including, but not limited to, flooding, water scarcity, and extreme weather) and implement proportionate measures to ensure resilience and continuity of service. Where appropriate, suppliers should consider recognised frameworks such as TCFD and TNFD in identifying and managing these risks.

In line with our ISO50001 accreditation, when purchasing new equipment or machinery, known and reputable suppliers are used ensuring the latest technology and therefore in general the most developed energy efficient products are procured.

BUSINESS INTEGRITY

Avara Foods seek business relationships based on trust, transparency and mutual accountability. We expect our suppliers to conduct business ethically and in accordance to all applicable laws and regulations.

ANTI-CORRUPTION & BRIBERY

We are committed to ensuring that fair and transparent business relationships exist throughout our supply chain. Avara Foods expects suppliers to protect our reputation, and the information or assets entrusted to them, including intellectual property, trade secrets, and financial information. Suppliers must implement effective measures to prevent corruption, fraud, and unethical behaviour that could compromise business integrity.

- **Fraud Prevention:** Suppliers must establish strong internal controls and anti-fraud measures, including staff training, financial auditing, and transparency in dealings with Avara Foods.
- **Compliance with Anti-Corruption Laws:** Suppliers must adhere to all applicable anti bribery and corruption laws, including prohibitions against offering, accepting, or soliciting bribes or kickbacks.

By adhering to these principles, suppliers help ensure the integrity and accountability of operations across our supply chain.

PROTECT AVARA'S INFORMATION, ASSETS AND REPUTATION

Avara Foods expects our suppliers to protect our reputation and any information or assets we entrust to them. This includes but is not limited to, our processes, intellectual property, trade secrets or financial information.

DATA PROTECTION

Suppliers must comply with GDPR regulations and treat all confidential information with the highest level of care and security. Suppliers may only share Avara Foods' information if explicitly authorised.

- **Data Security and Fraud Prevention:** Suppliers must implement cybersecurity measures to prevent unauthorised access, misuse, or fraudulent activity involving sensitive data. This includes safeguarding data storage and processing systems.
- **Supplier Accountability:** Suppliers must ensure their sub-suppliers also adhere to these standards to protect Avara Foods' data, reputation, and assets.

By embedding these controls, we ensure data protection and fraud prevention remain integral to all supplier operations.

CONFLICTS OF INTEREST

We expect our suppliers to disclose all actual or potential conflicts of interest arising from either personal or business relationship with Avara Foods or its employees.

SOCIAL MEDIA

Suppliers must not appear, or claim, to represent Avara Foods on social media. We reserve the right to act if a supplier's social media posts:

- Are derogatory, offensive, discriminatory or contain defamatory comments about the company or anyone else associated with our business.
- Break confidentiality or contain commercial sensitive info.
- Include content that could be regarded as abusive or bullying.

Any personal technology, e.g. camera phones, must only be used with express permission from the site manager (or equivalent) and only if required for professional reasons.

We will review any concerns on a case-by-case basis, and we reserve the right to terminate supplier contracts should any of the instances, above, be identified. In all cases, we will endeavour to work with suppliers to ensure that social media is used as a positive influence.



SECTION 3:

COMPLIANCE TO THE CODE

REPORTING OF VIOLATIONS OF THIS CODE

Our suppliers must notify us of any violations of this code. Where issues are raised we would expect our suppliers to be open and forthcoming so that we can work together to understand and resolve any issues.

You may raise a concern by contacting your Avara representative.

FAILURE TO COMPLY WITH THIS CODE

Our aim is to work in partnership with suppliers to improve the strength of our supply chain. This Code of Conduct is not just about setting rules, it's a summary of the way we want to work and the way we think responsible businesses should operate. If a supplier consistently fails to fulfil the expectations within the Code or is unwilling to engage, we reserve the right to end our relationship.



For more information about Avara Foods please visit our website at: www.avarafoods.co.uk

For any specific questions about this Code please contact your Procurement representative at Avara Foods.