



# Supplier *Code of Conduct*

# Hello!

We like to do business the right way. By striving to constantly improve standards of quality in all that we do, showing consideration for our environment and respecting business relationships with both customers and suppliers, we are able to prove ourselves to be one of the world's leading, trusted and greenest maltsters.

Since 1921, we have focused on a strong ethical and social business standard that goes right around the world and we're proud of our achievements. Sustainable and accountable ways of working have always been embedded in our long heritage, with profits achieved being re-invested back into planning energy-efficient and environmentally friendly processes.

The culture that Muntons is built on is very important to us and our reputation. We value our Suppliers and Business Partners and see them as an extension of our family, so we ask that they commit to, and uphold the same principles that we follow.



## Supplier Code of Conduct

The supplier code of conduct explains what Muntons plc expects from you as a supplier with regards to environmental, human rights, business practices, employee relations, health & safety and other topics related to sustainable and responsible business practices. It forms the foundation of Muntons plc's sustainable procurement program and defines what customers, investors, and other shareholders can expect from us.

This code is based on well-respected and recognised international benchmarks, including the International Labour Organisation, United Nations Universal Declaration of Human Rights and industry best practices.

Compliance with this code is a pre-requisite for doing business with Muntons, as it defines the non-negotiable minimum standards that we ask our suppliers and their sub-tier suppliers or sub-contractors ("the Supplier"), to respect and adhere to. In the spirit of continuous improvement, suppliers will be assessed for compliance to this code.

Muntons seeks to develop and strengthen partnerships based on a shared commitment of transparency, collaboration, and mutual respect. We recognise that our suppliers are independent businesses and the exclusive employers of their workers. However, the actions of our business partners can be attributed to Muntons, affecting not only our reputation, but the level of trust we have worked hard to earn from suppliers, partners, and customers.

While Muntons appreciates that our suppliers operate in a variety of different legal, geographical, and cultural environments we expect all suppliers to comply with the Code, and encourage our suppliers to strive to exceed these standards.

The standards of this Code are in addition to, and not in lieu of, the provisions of any legal agreement or contract between a supplier and Muntons.

Mark Tyldesley  
Managing Director

# The Muntons company timeline

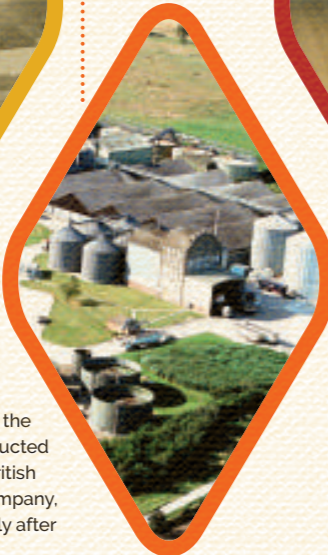
**1921**

**Muntons Incorporated**  
Originally named Munton & Baker (Bedford) Ltd, derived from the name of the company creator: Munton Baker-Munton.



**1948**

**Moved to Stowmarket**  
Muntons took over the 45 acre site, constructed originally for the British Nylon Spinners company, who vacated shortly after the war.



**1964**

**Expanded to Bridlington**  
Construction of new maltings completed in the midst of the fine barley growing region, to supply northern breweries and the Scottish whisky distilling trade.



**1976**

**Cedars Maltings built at Stowmarket**  
This new maltings picked its name from the cedar trees prevalent in the area and also provided the name for the site address at the time: Cedars Factory.



**2007**

**Singapore office opened**  
Providing us with a locally based sales presence to simplify communication with our Asian customers and dramatically increase local awareness of our company and its products.

**2009**

**US company formed**  
With significant trade in US homebrew and craft brewing, opening a US based company helped improve communication and access to this expansive market.



**2015**

**Anaerobic Digester completed at Stowmarket**  
A project which underlines our commitment to sustainability, our AD plant not only reduces waste and greenhouse gas emissions but contributes towards our demand for electricity.



**2019**

**Peating Plant built near Bridlington**  
Located close by to complete the malting process and introduce naturally phenolic peat flavours, the Tithe Top plant helps to serve the needs of the scotch whisky industry.



**2020**

**Malt extract capacity increased**  
Evaporator three means we are able to meet the growing demand for malt extract from customers around the world.



**2022**

**Achieved first SBTi target 3 years early**  
45% Scope 1&2 co2e

**2023**

**Energy centre built at Stowmarket**



**2024**

**Kings Award for Sustainable Development**

**2025**

**New intake at Bridlington**



## The following categories encompass the Code of Conduct.

### 1. Employment is Freely Chosen

There is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour.

Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.

Our Slavery and Human Trafficking Statement can be viewed on our website.

### 2. Freedom of Association and the Right to Collective Bargaining are Respected

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

### 3. Working Conditions are Safe and Hygienic

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 during work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. 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. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

The company observing the Code shall assign responsibility for health and safety to a senior management representative.

## 4. Child Labour Shall Not be Used

Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child; child and child labour being defined in the ETI Base Code guidance on Child Labour and the ILO definition:

<https://www.ethicaltrade.org/insights/resources/base-code-guidance-child-labour>

<https://www.ilo.org/ipec/facts/lang--en/index.htm>

These standards recognise that a ban on child labour is not the best way to protect young people. It can be deemed discriminatory to not allow a younger person to do some non-hazardous work simply based on their age. Preventing young people from learning a trade or skill can hinder their ability to secure suitable work when they leave full time education. As such, it is acceptable to allow young people and children to work provided that:

- ◆ They are not missing any part of their education
- ◆ They are properly remunerated at the correct rate for the job
- ◆ They do not undertake any hazardous tasks
- ◆ They are not exposed to physical, psychological, or sexual abuse
- ◆ They do not work underground, under water, at dangerous heights or in confined spaces
- ◆ They do not work with dangerous machinery, equipment, or tools
- ◆ They do not do work involving manual handling or transporting heavy loads



## 5. Land Acquisition

We adhere to the principle of free, prior and informed consent of all communities when acquiring land. The rights of communities and traditional peoples to maintain access to land and natural resources will be recognised and respected.

## 6. Living Wages are Paid

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 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.

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.

## 7. Working Hours are Not Excessive

Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.

In any event, workers shall not on a regular basis, be required to work in excess of 48 hours per week (averaged over 17 weeks) and shall be provided with at least one day off for every seven-day period on average.

Overtime should be voluntary and must always be compensated at a premium rate. It shall not exceed 12 hours per week, and must not be demanded on a regular basis.

## 8. No Discrimination is Practised

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, sex, gender assignment, marital status, pregnancy, sexual orientation, union membership or political affiliation.

## 9. Regular Employment is Provided

To every extent possible, work performed must be on the basis of a recognised employment relationship established through national law and practice.

Obligations to workers under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangement.

Nor should it be avoided through apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

Finally, no such obligations be avoided through the excessive use of fixed-term contracts of employment.

## 10. Fair and Respectful Treatment in the Workplace

### No Harsh or Inhumane Treatment is Permitted

Muntons expects suppliers to create and maintain working environments where all individuals are treated with dignity, respect and fairness. Any form of harsh or inhumane treatment is strictly prohibited. This includes physical abuse or discipline, the threat of physical abuse, sexual or other harassment, verbal abuse, intimidation or any behaviour that compromises the wellbeing or safety of workers.

### Diversity, Equity and Inclusion

Suppliers must ensure that all employees are treated equally and without discrimination. Employment related decisions should be based on objective criteria relevant to the role and must not be influenced by characteristics such as race, gender, age, disability, religion, nationality, sexual orientation or any other protected or personal attribute.

Suppliers are encouraged to foster an inclusive working culture where differences are respected, people feel able to contribute fully, and all workers have fair access to opportunities. These expectations apply to the supplier's own workforce and to any subcontractors or labour providers involved in delivering products or services to Muntons.

## 11. Confidentiality and Information Security

The confidentiality of information exchanged during business must always be respected and must not be used for illegal purposes or for personal gain. Suppliers must not provide false or misleading information during commercial discussions or at any point in the business relationship.

Suppliers are expected to protect any information shared with them by Muntons, including business, operational or personal data. Such information should only be used for legitimate business purposes and must not be shared with unauthorised parties.

Suppliers should have basic information security practices in place to help prevent unauthorised access, loss or misuse of information. These may include sensible controls such as limiting access to information, keeping systems secure, and ensuring employees understand their responsibilities when handling data.

Suppliers should notify Muntons if they become aware of any incident that could affect the confidentiality or security of information related to Muntons, its employees or its customers.

## 12. Compliance with Laws

Suppliers are required to act lawfully and comply with all applicable local, national, and international laws and regulations. This includes, but is not limited to, labour laws, environmental regulations, anti-bribery and corruption statutes, and trade compliance requirements.



## 13. Preventing Financial Misconduct and Unethical Practices

Muntons has a range of policies covering business ethical issues such as bribery and corruption, fraud and money laundering. They are communicated to all staff through our handbook and senior executives complete an annual reminder and evaluation procedure to reinforce this. They can be viewed on our website.

### Bribery and Corruption

A bribe may involve giving or offering any form of gift, consideration, reward or advantage to someone in business or government in order to obtain or retain a commercial advantage, or to induce or reward the recipient for acting improperly, or where it would be improper for the recipient to accept the benefit.

Bribery can also take place where the offer or giving of a bribe is made by or through a third party (e.g., an agent, representative or intermediary). Facilitation payments are small payments or fees requested by government officials to speed up or facilitate the performance of routine government action (such as the provision of a visa or customs clearance). Such payments are strictly prohibited.

Suppliers, representatives and their employees must comply with all applicable antibribery and corruption laws. If no such antibribery or corruption laws apply, or are of a lesser standard than the UK Bribery Act 2010, suppliers, representatives and their employees must adhere to the UK Bribery Act 2010. Antibribery and corruption procedures, designed to prevent employees or persons associated with their business from committing offences of bribery or corruption, should be in place. These procedures must be properly implemented into the business and reviewed regularly to ensure that they operate effectively.

### Fraud

Suppliers must ensure that all business dealings are legitimate, honest and transparent. Fraud—whether through deception, falsification of documents, misrepresentation, concealment, or misuse of company assets—is not acceptable under any circumstances.

Examples of fraud include (but are not limited to):

- ◆ falsifying invoices or financial records
- ◆ misreporting product origin, specifications or quantities
- ◆ diverting goods or payments for unauthorised purposes
- ◆ intentionally providing false or misleading information

Suppliers should maintain accurate records and implement reasonable controls to prevent, detect and address fraud within their operations and supply chains.

#### Money Laundering

Money laundering includes any activity intended to disguise the origins of illegally obtained funds or to make such funds appear legitimate. Suppliers must not engage in, support or enable money laundering or terrorist financing; and are expected to:

- ◆ conduct appropriate due diligence on business partners where relevant
- ◆ ensure financial transactions are transparent and recorded accurately
- ◆ avoid cash payments or unusual financial arrangements that may conceal improper activity

Any suspicions or concerns relating to money laundering must be reported to Muntons without delay.

### 14. Conflict of Interest

Suppliers must conduct business in a way that avoids situations where personal interests, financial relationships or outside activities could influence, or appear to influence, fair and objective business decisions. A conflict of interest can arise when an individual's personal interests do not align with their professional responsibilities, or when these interests could compromise impartial judgement.

Suppliers are expected to identify and manage any potential or actual conflicts of interest within their organisation or among their representatives. Any situation that could reasonably be perceived as affecting independent decision making should be disclosed to Muntons so it can be reviewed and addressed appropriately.

### 15. Environmental Management

We support and encourage operating practices, farming practices and agricultural production systems that are sustainable. Sustainability for Muntons is aligned with the Sustainable Agriculture Platform and its associated benchmarking schemes such as the Farm Sustainability Assessment.

Suppliers and representatives will continually strive towards improving efficiency and sustainability of their operations which will include water conservation programmes.

The following aspects of environmental management will be included in the supplier assessment:

- ◆ there should be a company environment representative;
- ◆ the company should be aware of and able to demonstrate compliance with all current legislation that may affect its activities;
- ◆ the company should conduct an environmental review and consider all aspects of its products and services; and
- ◆ any enforcement, improvement or prohibition notices served the site within the last three years.

We have policies in place for energy use, carbon emissions reductions, green travel and biodiversity. We expect our suppliers to have similar strong programmes and policies in place to support this stance

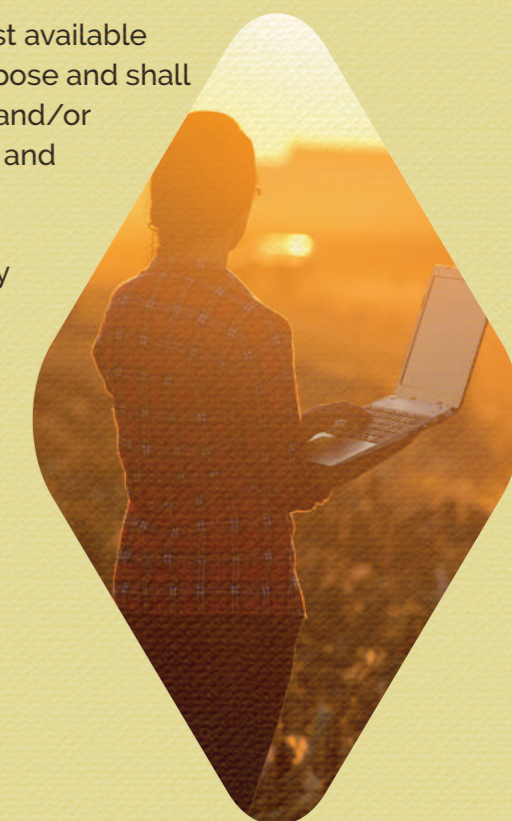
### 16. ESG Responsibility Across the Supply Chain

Suppliers must actively identify, manage, and mitigate Environmental, Social, and Governance (ESG) risks within their own operations and throughout their supply chain. This includes ensuring that their suppliers adhere to equivalent standards on sustainability, ethical labour practices, and responsible sourcing.

### 17. Quality

Any goods supplied shall be without fault and of the best available design, quality, material and workmanship, be fit for purpose and shall conform in all respects with the order and specification and/or patterns or samples supplied or advised by the supplier and representatives.

Any services supplied shall be provided by appropriately qualified and trained personnel, with due care and diligence. They must be done so to a consistent high standard of quality as is reasonable for Muntons to expect.



## 18. Audit and Termination of Agreements

Muntons reserves the right to verify the supplier's and representative's compliance with the Code.

Where supplier and representative reviews or audits demonstrate shortcomings in any of these areas, the supplier and representative should strive to implement a time-bound programme of improvement (remediation) leading to conformance.

If Muntons becomes aware of any actions or conditions not in compliance with the Code, we reserve the right to request corrective actions. Where corrective actions are not taken within a reasonable time-period, Muntons reserves the right to terminate a contract.

## 19. Whistleblowing

At Muntons, we are committed to conducting our business with integrity and respect for people and the planet. Suppliers are encouraged to report any concerns over suspected unethical, illegal, or inappropriate conduct related to procurement practices within our organisation through our independent and anonymous whistleblowing service:

**Call – 0800 988 6818**

**Report online = [www.seehearspeakup.co.uk/en/file-a-concern](http://www.seehearspeakup.co.uk/en/file-a-concern)**

All reports will be investigated promptly and fairly. Retaliation against any supplier for raising concerns in good faith will not be tolerated.

### **Accountability**

Procurement Team: [procurement@muntons.com](mailto:procurement@muntons.com)



*We  
Look Forward  
to Working  
with **YOU...***



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