



# Supplier Code of Conduct

As a trusted natural extracts and ingredients manufacturer providing solutions to the global flavour, fragrance and consumer goods markets from our bases in the UK, the US and China, sustainability and ethical and social accountability are embedded in our organisational culture and business activity.

This Code is designed to outline the values we expect Suppliers to follow in the conduct of their business. Treatt requires that all Suppliers respect this Code of Conduct and adopt practices within their operations and supply chains that align with our requirements.

## Human Rights

### Labour Rights

Recognising that there are differences in laws, cultures and economic conditions that affect business practices around the world, Treatt requires Suppliers to comply with the full requirements of the Ethical Trading Initiative Base Code ('ETI Base Code'), and any amendments thereof, concerning best practice with regard to social accountability. Find out more [HERE](#)

The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice and provides provisions in respect of:

- Employment is freely chosen
- There is no forced, bonded or involuntary prison labour.
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

### Health & Safety

The health and safety of employees is Treatt's number one priority. In addition, we seek to ensure the safety of all third parties, which attend our sites. Treatt promotes a positive in-house health and safety culture through regular health and safety committee meetings, internal safety audits and extensive employee training, all of which lead to continuous improvement. Particular emphasis is placed upon the recording and assessment of 'near misses' and the resultant implementation of preventative measures.

Suppliers shall provide a safe and hygienic environment for workers, which at the very least, complies with the ETI Base Code. This should include training of all employees to a level relevant to their role, monitoring of health and safety performance, and implementation of systems to manage and mitigate risk.



## Modern Slavery

In addition to compliance with the provisions of ETI Base Code, Treatt is committed to ensuring that modern slavery does not take place anywhere in our business or in any of our supply chains. Modern slavery may take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking and is a crime and a violation of human rights, which exploits a person for personal or commercial gain. In accordance with our Modern Slavery Statement, found on our website, we are committed to tackling modern slavery throughout our business and we expect the same high standards from Suppliers in eliminating modern slavery. Treatt will not support or deal with any business knowingly involved in modern slavery.

## Diversity

Treatt hires, promotes, develops and compensates employees based on meritocracy and without regard to age, gender, disability, marital status, race, national origin, religion or sexual orientation or any other legally protected characteristics or status. Our Suppliers are also expected to recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed, without regard to any protected characteristics or any other category not relevant to performance.

## Environment

Good environmental practice is important in ensuring that we, and our Suppliers, operate responsible and sustainable businesses, which reduce their negative impact on the environment and comply with all applicable environmental laws, regulations and standards.

Suppliers shall adopt an appropriate policy, standard, procedure and management system in order to ensure that operations are managed in a sustainable way. An environmental management system (EMS) must be in place which includes at minimum identification of material impacts, management accountability, procedures, monitoring of environmental performance, implementation of systems to manage and mitigate risk and a management commitment to continuous improvement.

This management system should include, but not be limited to, the following aspects, as relevant to the Supplier's business activities:

- Greenhouse Gas emissions
- Energy use
- Hazardous waste
- Air and water pollution
- Water use and discharge
- Resource use efficiency
- Waste reduction
- Raw materials sourcing
- Emergency response plans and procedures

Sustainability is at the core of our values and we expect our Suppliers to understand, align and partner with us to achieve our sustainability objectives, including but not limited to:

- Climate change and climate-based risks
- Biodiversity & deforestation
- Sustainable agriculture
- Biodegradability and recyclability of materials



## *Ethics and Integrity*

### **Anti-Bribery and Corruption**

In all our dealings we are committed to complying with applicable anti-corruption laws including those relating to actions that could be considered bribery. These laws, including the UK Bribery Act and the US Foreign Corrupt Practices Act, and similar anti-corruption regulations throughout the world shall be complied with. Violations of anti-bribery laws can result in criminal convictions for the individuals and organisations concerned. Treatt strictly forbids any form of bribery anywhere in the world by any Supplier.

Bribery is the giving, promising, offering, receiving, agreeing to receive, requesting or accepting of anything of value or any kind of advantage, to or from any person in order to influence them improperly in the performance of their duty. A thing of value or advantage might be money; it may also include loans, gifts, travel or favours.

### **Tax Evasion**

Treatt does not condone, encourage or support tax evasion, and is committed to implementing procedures to prevent anybody employed or contracted to Treatt or acting on Treatt's behalf facilitating the evasion of tax. Any involvement by persons associated with Treatt (broadly employees, contractors and parties acting for Treatt) in such activities is considered damaging to our reputation and potentially the long-term sustainability of our business, therefore Treatt will not engage in transactions which we know or suspect facilitates tax evasion, even if it may result in us losing business. Tax evasion is against Treatt's general business principles; Treatt expects the businesses and people we engage with to comply with their tax obligations.

### **Gifts and Hospitality**

Treatt's policies do not preclude the giving and receiving of gifts and hospitality; they are permitted where they are transparent, proportionate, reasonable and within the laws of the country in which they are given or received. They are expressly prohibited where they could influence or be perceived to be capable of influencing any material transaction. Treatt employees must declare any gifts received which are above a nominal value and must not accept hospitality exceeding limits stated in our policy, without prior management approval.

Suppliers are expected to abide by Treatt's policies in respect of the giving of gifts and hospitality to Treatt employees in that they should be transparent, proportionate, reasonable and within the laws of the country in which they are given or received.

### **Whistleblowing**

Treatt has a Whistleblowing Policy, approved by the Board, which provides a confidential process by which all workers are able to raise concerns that they may have about the conduct of others in the business or the way in which the business is run, without fear of retaliation.

Suppliers are expected to have regard for the importance of preventing and eliminating wrongdoing in their business and should have a communicated process for workers to express grievances without fear of reprisal and ensure concerns are appropriately addressed in a timely manner.



## Business Continuity

We maintain and require Suppliers to maintain adequate business continuity plans to enable a continuation of services to a reasonable degree in the aftermath of any kind of operational crisis, whether caused by a natural disaster, equipment malfunction, power failure, terrorist act, cyber-attack, or so forth. Upon request by Treatt, Suppliers will disclose in reasonable detail and discuss the elements of its business continuity plans and its information security systems and controls.

## Legal Requirements

Treatt requires Suppliers to abide by all relevant local, regional, and international laws, regulations, and standards in the markets where they operate. Where these differ from this Code of Conduct, we expect Suppliers to comply with the more stringent standards and principles.

## Audit

Treatt reserves the right to verify Supplier compliance with this Supplier Code of Conduct through our own audits, or by requiring evidence of independent third-party audit of compliance with all or part of these requirements.

In the event that a Supplier fails to meet the requirements of this Code of Conduct and no actions are made toward remediation, Treatt may terminate the supplier agreement or take any other actions as required by law.

Treatt will recognise third party audits carried out under the following schemes as evidence of compliance with minimum requirements of this code (subject to a satisfactory outcome to the audit):

- SMETA 4-Pillar, preferably with the AIM-PROGRESS module
- Audit carried out by a member of AIM-PROGRESS under their mutual recognition scheme
- Unilever Responsible Sourcing Audit (URSA)
- Business Social Compliance Initiative (BSCI)
- Fair Labor Association (FLA)
- Social Accountability 8000 (SA8000)

## Review and Communication

This Code of Conduct will be shared with all Suppliers. We ask that Suppliers share it with the appropriate individuals within their leadership, sales, procurement, and operational teams.

This Code of Conduct will be reviewed annually and updated from time to time. The most current version can be found on our website at [www.treatt.com](http://www.treatt.com)

As new versions are issued, Suppliers will be asked sign these.

**Signed By:**

Ryan Govender  
Interim CEO

**Date of issue:**

01/04/2022

**Date of last review:**

01/02/2024

### To be filled out by Supplier

**Signed By:**

**Print Name:**

**Company Name:**

**Date:**