



UBM Ethical Sourcing Policy

Purpose

Our company is committed to sourcing raw materials, ingredients, packaging, and services in a responsible, sustainable, and ethical manner. We expect all suppliers, growers, processors, distributors, and contractors to adhere to the standards outlined in this Ethical Sourcing Policy to ensure the integrity, safety, and sustainability of our food products.

Scope

This policy applies to all suppliers and business partners involved in the production, processing, packaging, storage, transportation, and delivery of goods and services used in our food manufacturing operations.

Supplier Requirements

1. Compliance with Laws and Regulations

Suppliers must:

- Comply with all applicable local, national, and international laws and regulations.
- Meet all food safety, labor, environmental, and trade requirements relevant to their operations.
- Maintain all required licenses, permits, certifications, and registrations.

2. Food Safety and Quality

Suppliers must:

- Implement and maintain effective food safety management systems.
- Follow Good Manufacturing Practices (GMPs), sanitation procedures, and preventive controls.
- Ensure full traceability of ingredients and materials.
- Promptly report any food safety incidents, recalls, contamination events, or regulatory actions that may affect supplied products.
- Maintain documented quality assurance programs and testing procedures.



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3. Human Rights and Labor Standards

Suppliers must:

- Prohibit forced, bonded, trafficked, or involuntary labor.
- Prohibit child labor and comply with legal minimum age requirements.
- Provide wages, benefits, and working conditions that meet or exceed legal requirements.
- Maintain reasonable working hours and overtime practices.
- Respect employees' rights to freedom of association and collective bargaining where permitted by law.
- Provide equal employment opportunities and prohibit discrimination, harassment, and abuse.

4. Health and Safety

Suppliers must:

- Provide safe and hygienic working conditions.
- Implement programs to identify and control workplace hazards.
- Ensure employees receive appropriate safety training.
- Supply necessary personal protective equipment (PPE).
- Maintain emergency response and incident management procedures.

5. Sustainable Agriculture and Responsible Sourcing

Where applicable, suppliers should:

- Promote sustainable farming and agricultural practices.
- Use water, soil, and natural resources responsibly.
- Minimize pesticide, fertilizer, and chemical impacts on the environment.
- Protect biodiversity and natural ecosystems.
- Avoid sourcing materials associated with illegal deforestation or habitat destruction.



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6. Animal Welfare

Suppliers providing animal-derived products must:

- Comply with applicable animal welfare laws and industry standards.
- Provide humane treatment throughout breeding, raising, transport, and processing.
- Implement practices that minimize animal stress and suffering.
- Maintain appropriate veterinary care and welfare monitoring programs.

7. Environmental Responsibility

Suppliers must:

- Comply with environmental laws and regulations.
- Reduce waste generation and improve resource efficiency.
- Manage emissions, wastewater, and hazardous materials responsibly.
- Pursue continuous improvement in environmental performance.
- Support recycling and sustainable packaging initiatives where feasible.

8. Ethical Business Practices

Suppliers must:

- Conduct business honestly and transparently.
- Prohibit bribery, corruption, fraud, and facilitation payments.
- Avoid conflicts of interest that could compromise business decisions.
- Maintain accurate records and documentation.
- Protect confidential and proprietary information.

9. Supply Chain Transparency and Traceability

Suppliers must:

- Maintain records sufficient to trace products, ingredients, and materials through the supply chain.
- Provide information regarding the origin of raw materials upon request.



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- Notify our company of significant supply chain risks or disruptions.
- Cooperate with supplier assessments, audits, and investigations.

Monitoring and Verification

Our company may verify compliance through:

- Supplier questionnaires and self-assessments.
- Documentation reviews.
- On-site or remote audits.
- Certification reviews.
- Product testing and traceability exercises.

Suppliers are expected to cooperate fully with these activities.

Corrective Action and Continuous Improvement

When non-compliance is identified, suppliers must:

- Investigate and address the root cause.
- Develop a corrective action plan with defined timelines.
- Provide evidence of implementation.
- Demonstrate ongoing improvement efforts.

Failure to address significant violations may result in suspension or termination of the business relationship.

Reporting Concerns

Suppliers are encouraged to promptly report actual or suspected violations of this policy, applicable laws, food safety requirements, or ethical standards.



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Policy Review

This policy will be reviewed periodically to ensure alignment with evolving regulatory requirements, industry best practices, customer expectations, and sustainability commitments.

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