



Ethical Sourcing Policy

Casual Dining Group recognises its responsibility to ensure sound social, ethical and environmental practices within its own operations and within its supply chain, in every market in which it operates. We acknowledge that every worker deserves the right to live and work with dignity.

This Policy defines Casual Dining Group's minimum standards and the basic principles of cooperation that we expect of all our suppliers and business partners. Suppliers may in addition be required to comply with additional sub-policies and standards relevant to the products that we source from that supplier and specific risks or issues associated.

We expect our suppliers to comply with all relevant national and local legislation

Where our minimum standards or benchmark industry standards exceed legal requirements, we expect suppliers to work towards becoming compliant with our requirements.

We recognise that local socio-economic and cultural constraints might apply to the implementation of this Policy.

We understand the need for reasonable timeframes for compliance and acknowledge that forcing immediate compliance might result in a more detrimental overall situation for workers. Where such complexities exist, Casual Dining Group expects suppliers to work with us and/or other stakeholders to develop the most appropriate response to improve social, ethical and environmental practices.

In addition to its basis in relevant local and national legislation, this Policy is drawn from:

- The Proceeds of Crime Act, 2002
- The Foreign Corrupt Practices Act, 1977
- The Data Protection Act, 1998
- The International Labour Organisation (ILO)

- The United Nations (UN) Universal Declaration of Human Rights
- The Ethical Trading Initiative (ETI) whose Base Code is drawn from the scope and standards defined by the ILO and UN.
- The International Organisation for Standardisation (ISO)

Where there is non-compliance with the minimum requirements laid out in this Policy, we will require suppliers to develop and share plans with us to mitigate non-compliance including completion dates. We reserve the right to cease trading if compliance is not achieved or if we observe serious material or deliberate non-compliance.

2. Principles of Co-operation

Casual Dining Group understands that improving social, ethical and environmental standards in the supply chain is a challenging process requiring the efforts of its employees, suppliers and other stakeholders.

To drive continuous improvement, we will:

- Work to fair, transparent and mutually agreed terms and conditions
- Make payments for services provided in full and on time.
- Work collaboratively with suppliers to improve social, ethical and environmental standards where our support is needed and appropriate.
- Acknowledge specific national, regional or cultural challenges.
- Protect the confidentiality of information entrusted to us.
- Recognise suppliers' own standards where they are comparable to our own.
- Ensure that all relevant employees are aware of the Ethical Sourcing Policy.
- Act as an advocate for ethical sourcing within our industry.
- Seek to achieve improvements in supplier performance in this area.
- Include transparent social, ethical and environmental performance criteria in our supplier selection processes.
- Cease trading with suppliers demonstrating persistent disregard for this Policy.
- Give appropriate consideration to the impact of ceasing trading on suppliers.

We are committed to 14 social, ethical and environmental principles within our supply chain:

1. Employment must be freely chosen.
2. Freedom of association must be respected.
3. Working conditions must be safe and hygienic.
4. Child labour must not be used.
5. Fair wages must be paid.
6. Working hours must not be excessive.
7. Discrimination must not be practised.
8. Regular employment must be provided.
9. Harsh or inhumane treatment must not be permitted.
10. Conditions of dormitories must be acceptable to health and safety standards.
11. The rights of home-workers and migrant workers must be respected.
12. Business must be conducted lawfully and to a high ethical standard.
13. As appropriate to the product supplied, suppliers must ensure high standards of animal welfare, health and husbandry.
14. Environmental stewardship and responsible management must be practised.

3. Casual Dining Group Policy Requirements

3.1 Employment

1. There is no forced, bonded, indentured or involuntary prison labour.
2. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.
3. There is no slavery or human trafficking in any part of the supply chain at any time.

3.2 Freedom of Association

4. Workers, without distinction, have the right to join or form trade unions or other comparable, legal organisations of their own choosing and to collectively

make representations to, or enter into negotiations over employment issues with their employer.

5. The employer adopts an open attitude towards the activities of worker organisations and their activities.

6. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

7. 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.

3.3. Working Conditions

8. A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry, any specific hazards and legal requirements in line with internationally recognised certification and standards (such as the Occupational Health and Safety Assessment OHSAS 18001 or the International Labour Office ILO-OSH 2001 system).

9. A record of health and safety incidents (accidents and injuries) shall be maintained, with an action plan to improve performance by minimising the causes of hazards in the working environment.

10. Workers receive regular, recorded health and safety training.

11. Access is provided to clean toilet facilities, potable water and sanitary food storage.

12. Responsibility for health and safety is assigned to a senior management representative.

3.4 Child Labour

13. Suppliers may not employ workers under the age of 15 (14 in certain developing countries as designated by ILO conventions) except on a seasonal or part-time basis.

14. Suppliers must maintain formal documentation that verifies the age of each worker.

15. Suppliers must comply with all relevant child labour laws.

16. Suppliers shall contribute to programmes that provide for the transition of child labour to education or support Casual Dining Group's efforts to do so.

17. Young persons under 18 shall not be employed at night or in hazardous conditions.

3.5. Fair Wages

18. Wages and all legally mandated benefits paid for regular hours of work 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.

19. Overtime must be paid at a premium rate, at a minimum compliant with national legislation.

20. Wages shall be paid directly to the workers in the form of cash or cheques or into a nominated bank account, at the agreed intervals and in full.

21. 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.

22. No deductions from wages (other than those prescribed by law) may be made without the expressed permission of the worker concerned.

3.6 Working Hours and Annual Leave

23. Working hours must comply with national laws and industry standards.

24. Workers shall not be required to work in excess of a basic 48 hours per week. Overtime must be voluntary, must not average more than 12 hours per week and must not be demanded on a regular basis.

25. If under exceptional circumstances, an overtime of over 12 hours is required, this should be recorded and reported by the supplier.

26. Workers may refuse to work overtime without any disciplinary action being taken against them.

27. Reasonable annual leave must be afforded to each employee based on a clear formal policy.

3.7 Discrimination

28. Suppliers will fully comply with local laws regarding equality of employment opportunities.

29. Subject only to local law, suppliers will practise no discrimination in hiring, compensation, training, promotion, termination or retirement based on race, caste, nationality, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

30. If the supplier feels that structural discrimination exists that is beyond its ability to control then this should be recorded and reported to Casual Dining Group. A collaborative approach will be taken to resolve the issue in a manner that is sensitive to the cultural and social context.

3.8 Regular Employment

31. Work performed must be on the basis of a recognised employment relationship established through national law and practice.

32. Obligations to employees 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 arrangements, or through apprenticeship schemes.

33. Migrant, contract, part-time and home-workers must receive the same rights, benefits and opportunities for advancement as other workers performing similar activities.

3.9 Humane Treatment

- 34. Physical and verbal abuse, the threat of physical abuse, sexual harassment or other forms of intimidation shall be prohibited.
- 35. Disciplinary actions must be fair, proportionate and fully compliant with local laws.
- 36. All disciplinary actions must be recorded.
- 37. Suppliers will record any incidence of harsh or inhumane treatment and develop action plans to prevent future violations.
- 38. Suppliers will develop a whistle-blowing policy and process for its workers.

3.10 Dormitories

- 39. Dormitory facilities must meet all local laws and regulations covering health and safety, sanitation, electrical, mechanical and structural safety.
- 40. An evacuation plan must be prominently displayed.
- 41. Dormitory facilities should have been designed and built for human habitation.
- 42. Facilities should be away from main factory and production buildings.
- 43. Charges for rent and food must be reasonable and benchmarked against local cost and wage levels.
- 44. Each worker must be provided with an individual sleeping area (bed or mat).
- 45. Sleeping quarters must be segregated by gender.
- 46. Workers must be provided with adequate and lockable storage space.
- 47. Sleeping quarters must have adequate lighting.
- 48. Appropriate quarters must be provided for couples who are legally married.
- 49. The living space per worker must be the minimum legal requirement or the local industry standards, whichever is the greater.
- 50. Workers must be allowed to leave and enter freely during time off work subject to reasonable restriction imposed based on safety considerations.
- 51. Dormitory accommodation must include access to potable water.
- 52. Workers must be provided with adequate recreational facilities.
- 53. Adequate toilet and shower facilities must be provided, segregated by gender and maintained in hygienic condition.

3.11 Animal Welfare

- 54. As appropriate to the product supplied, suppliers must be able to demonstrate that they operate high standards of animal health, welfare and husbandry, both for animals reared for food and in other circumstances, where animals may be used within the supply chain e.g. for work and transportation.

Note: Food suppliers should refer to Casual Dining Group's supplementary Animal Welfare Policy for further details of requirements specific to their operations.

3.12 Ethics

55. All relevant national and international legal requirements must be complied with.

56. Casual Dining Group must be informed of any serious breaches of compliance or investigations by authorities into potential breaches.

57. Suppliers must prevent:

- Money laundering
- Insider trading
- Fraud, bribery and corruption and other improper payments or gifts
- Unauthorised access to personal and business information

3.13 Environmental Stewardship

58. Suppliers must comply with all relevant local, national and international legal requirements regarding environmental stewardship.

59. As appropriate to the size and complexity of the business, suppliers must be able to demonstrate environmental practices, policies and management systems sufficient to ensure continuous improvement in environmental performance, including

- Awareness of potential environmental risks inherent in business operations
- Documented environmental policies
- Ability to monitor performance
- Ability to mitigate and minimise environmental risks and impacts

60. Suppliers should seek to:

- Minimise the use of water, energy and raw materials
- Minimise waste
- Minimise contamination of the local environment
- Maximise the use of recyclable and renewable materials
- Dispose of waste in a safe and environmentally responsible way
- Ensure that emissions, air, noise and odour pollution are within locally or nationally defined limits.

4 Policy Implementation

4.1 Casual Dining Group's Commitment to Social, Ethical and Environmental Standards

Casual Dining Group is committed to the principles of ethical sourcing and undertakes to:

- Engage its management team and employees.
- Provide appropriate training on this Policy to all key employees (e.g. buyers)
- Communicate this policy to all Tier 1 suppliers and make it publicly available.
- Undertake a supply chain risk assessment to identify and prioritise suppliers and products with higher social, ethical and environmental risk across all purchasing categories.
- Commence active supplier engagement in higher risk areas to understand their compliance status and issues that will act as a barrier to mitigation and to promote and support their compliance with this Policy.
- Develop and communicate to our employees, our suppliers and within our public reporting, our strategy for future development and monitoring of supplier compliance with this Policy.
- Review and revise this Policy on an annual basis.
- Report on progress in improving social, ethical and environmental standards both internally and externally.

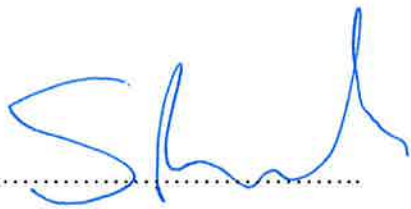
Casual Dining Group reserves the right of access to supplier operations for our own auditors or by third party auditors engaged by Casual Dining Group in order to assess compliance with this Policy.

4.2 Acceptance of Code - Supplier Requirements

Suppliers shall commit to comply with this Policy and to:

- Communicate to all employees, suppliers, sub-contractors, home workers and temporary and contract staff engaged in their supply chain.
- Comply with all applicable laws in the countries in which they operate and all relevant ILO conventions. Where standards differ, the standard which offers the greater degree of protection to workers will apply.
- Establish management systems for delivering compliance with this Policy.
- Maintain records demonstrating compliance. An individual in a senior management position should be given responsibility for Policy compliance.
- Train relevant staff on social, ethical and environmental and human rights standards.
- Allow Casual Dining Group employees and representatives access to documentation, management and workers to determine progress against these standards.
- Report any serious breaches of this Policy to the relevant Casual Dining Group buyer or other such nominated Casual Dining Group representative.

Signed:



Chief Executive, Casual Dining Group

Date: 22 October 2015

Signed:

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Print:

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Title:

Date:

I declare that I have received and acknowledge in full Casual Dining Group's Ethical Trading Policy and agree to work with Casual Dining Group towards full compliance abiding by the Principles of Implementation.

On behalf of: *(Company name)*

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Issue Number: 001

Written By:

Authorised By:

Date:

Next Review Date: October 2016