



# SUPPLIER CODE OF CONDUCT

Version – 001  
Date – December 2022  
Originator – R. Ortiz  
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## Mission

Typhoo is committed to trading responsibly and ethically and recognise our responsibility to conduct business in a manner that improves the lives of the men and women in our supply chain, their communities and the environment. We recognise a role for certification but also understand it is a journey of sustainable transformation and continue to develop policies and build on improvements that have already been made.

## Purpose

This Code of Conduct lays out the principles we require our suppliers to adhere to. The scope of this policy is to be implemented across the full supply chain, end to end, bringing about positive change for workers and small holder farmers in the Typhoo supply chain.

It references internationally recognised codes and standards where applicable and is intended to be used in conjunction with more detailed procedures or questionnaires relating to specific aspects (i.e. collection of gender disaggregated data, etc.).

Typhoo recognise there are challenges within the supply chains, particularly at grower level, and we welcome open discussions to drive transparency and understanding of the conditions throughout the supply chain. Typhoo are committed to sourcing from suppliers who create accountability and full disclosure around issues such as human rights, health and safety, gender-specific issues and environmental impacts throughout the supply chain. It is the responsibility of the first-tier supplier to ensure social and environmental minimum standards are upheld throughout the supply chain.

## Benchmark

As a minimum Typhoo requires all suppliers and supply chain actors to comply with applicable laws and relevant standards for human rights, workers rights and conditions, health and safety and environmental protection. Any contracts, purchase orders and other written agreements in place must be adhered to in full.

We are committed to upholding human rights and fully support the UN Universal Declaration of Human Rights, the International Labour Organization Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the UN Global Compact.

## Labour Conditions

Typhoo respect international core labour standards in our operations and through our supply base. As a member of the Ethical Trading Initiative (ETI), we expect our suppliers to be familiar with the ETI base code, which subscribes the ILO conventions, and to be implementing it throughout their supply chain. Where there are issues in achieving any aspect, Typhoo are looking for a first step of acknowledgement of these issues – and commitments to tackling them.



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The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice. It is used by ETI members and others to drive improvements in working conditions around the world.

Full details of the ETI base code can be found at [www.ethicaltrade.org/eti-base-code](http://www.ethicaltrade.org/eti-base-code)

The ETI base code covers the following principles:

- Employment is freely chosen
- 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

All UK and European Tier one suppliers are required to be registered on Sedex with a completed SAQ. Suppliers must link to Typhoo and provide full visibility. Suppliers are required to update their SAQ annually, or when business changes occur.

Typhoo recognise the tea and herbals industry faces additional complexities where additional services beyond the traditional factory worker model (potentially including accommodation) are provided. Smallholder growers may also be accountable for provision of all or a proportion of the crop. Ethical policies and plans should be in place to protect the human rights throughout all areas of business impact and should not be limited to practices within the factory environment alone.

Suppliers are expected to have whistleblowing policies and robust grievance mechanisms in place, sensible to gender and ethnic differences in order to appropriately address all instances of violence and discrimination.

Suppliers must inform Typhoo of any human rights concerns, allegations, fatalities or serious injuries in or against their organisation or supply chain as soon as they are made aware. In the event of a human rights violation, suppliers must work collaboratively to ensure that these are addressed and those affected receive redress.

## Environment

Typhoo recognise many of the farmers and growers of our products are already seeing the impact of climate change. Consumers are increasingly choosing what products and brands to buy based on their sustainability credentials. Typhoo is focussed on minimising any negative environmental impact and are committed to working with suppliers who are focussed on reducing their environmental footprint.



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As part of our commitment Typhoo require compliance with the applicable environmental legislation for the region, with the relevant certification scheme requirements or any particular specification conditions (eg recyclability of packaging items). Where environmental audits have been undertaken it is requested that you share with us the results of those audits.

Typhoo will be requesting more information from our supply base as we develop our own environmental action plans and develop our understanding of our full environmental footprint. This will include but not be limited to:

- Agricultural practices including Agro-chemical usage
- Biodiversity
- Carbon and Greenhouse Gas emissions
- Environmental Management Systems
- Land use practices
- Regenerative agriculture
- Sustainability plans
- Water usage
- Waste treatment

## Ethical Business

Typhoo is committed to the UK Modern Slavery Act 2015. We shall work closely with our supply chains in preventing modern slavery and human trafficking and will publish a progress report in each financial year as a responsible company.

Typhoo is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas and, in accordance with the UK Bribery Act 2010, will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

We expect Typhoo employees and representatives to be treated with respect, dignity and fairness at all times.

## Product Safety, Traceability and Quality

Typhoo is committed to sourcing high-quality products, ingredients and services that meet all applicable quality and food safety requirements. We expect from our suppliers to demonstrate that they have robust food safety and quality management systems in line with legislation, food safety programs, allergens and traceability, and they need to send a notification in case of food safety issues.



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All suppliers are required to submit the relevant supplier approval documentation to technical for approval – this may include audit documentation, supplier self-audit questionnaires, raw material specifications and product testing certification.

Samples must be submitted for approval as requested and production samples will be tested against pre-approved samples. Quality must always meet the agreed specification as a minimum. Any deviations from specification or changes to raw materials must be assessed and approved by Typhoo prior to supply.

Systems shall be in place to minimise the risk of purchasing fraudulent or adulterated raw materials and to ensure that all product descriptions and claims are legal, accurate and verified. Sharing of information about any potential developing (or historical) threats to the supply chain which may present a risk of adulteration or substitution is actively encouraged.

Full traceability must be maintained and available to demonstrate compliance with certification requirements and applicable food safety requirements.

Ongoing monitoring and review of specifications and approval status will be conducted according to the risk identified and the specific approval process for that material type in line with the Typhoo BRC Global Standard Food Safety Accreditation.

## Role of Certification

Typhoo believe certification has an important role to play in driving standards across the supply base. Typhoo is committed to sourcing from certified sources and our different brands require certification to different schemes such as Rainforest Alliance, Fairtrade Foundation or Soil Association Organic certification.

Any lapse in certification should be reported to Typhoo immediately. We are keen to understand the impact of the certification schemes and welcome discussion and feedback about any specific issues or opportunities.

## Transparency

Typhoo is committed to transparency and the publication of our tea sources. We value openness throughout the supply chain and the commitment of our suppliers and supply chain actors in supporting industry efforts to improve transparency.

Typhoo favours suppliers that are transparent about issues encountered and who share openly the risks and opportunities within the industry. An effective way found to kick off such information sharing is the exchange of social audit reports. We also welcome data sharing in relation to gender disparities, living wages or carbon emissions, among others. Typhoo is aware issues may be systemic and beyond the suppliers' current scope. The acknowledgement and monitoring of such issues is for us the first step to enable positive change.



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Typhoo will periodically request further information from the supply base about their operations to aid with our understanding of ethical and environmental impact of our operations or to gain a greater understanding of specific issues. All efforts should be made in answering these requests in a full and timely manner to enable ongoing improvement.

## Ongoing Improvement

Typhoo play an active role in efforts to improve the tea industry, and actively engage with NGO's and other organisations working towards a better tea industry from a Human Rights perspective. As a member of the Ethical Trading Initiative (ETI) and of the Ethical Tea Partnership (ETP) Typhoo are actively engaged in efforts to drive systemic change within the wider tea industry. We welcome collaboration with other organisations and actively encourage involvement of our suppliers and organisations throughout the supply chain.

Typhoo's expectation is that all suppliers are aware of the main social and environmental issues needing improvement in the context of their business operations and supply chain, and are able to communicate such to us. In the event a supplier identifies specific gaps or weaknesses in their social or environmental literacy, guidance requests from Typhoo will be welcome. It is expected suppliers will have a program of ongoing improvement to continue strengthening their practices and ensuring their business is driving positive impact.

## Audits, visits and compliance with the code

Typhoo reserves the rights 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. In the event that we become aware of any actions or conditions not in compliance with the Code, we reserve the right to request corrective actions. Typhoo reserves the right to terminate an agreement with any supplier and representatives that does not comply with the Code.

## **External References & Links:**

BRC Global Standard Food Safety

<https://www.brcgs.com/our-standards/food-safety/>

Ethical Trading Initiative (ETI) Base Code:

<https://www.ethicaltrade.org/eti-base-code>

Ethical Tea Partnership:

<https://ethicalteapartnership.org/get-involved/partner-with-us/>



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Fairtrade Standard for Tea:

[https://files.fairtrade.net/standards/Tea\\_SPO\\_EN.pdf](https://files.fairtrade.net/standards/Tea_SPO_EN.pdf)

International Labour Organization (ILO) Declarations:

ILO Declaration on Fundamental Rights and Principles at Work

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

ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy

<https://www.ilo.org/empent/areas/mne-declaration/lang--en/index.htm>

Sedex

<https://www.sedex.com/solutions/smeta-audit/>

Rainforest Alliance Standard

<https://www.rainforest-alliance.org/wp-content/uploads/2022/01/2020-RA-Sustainable-Agriculture-Standard-Farm-Requirements.pdf>

<https://www.rainforest-alliance.org/wp-content/uploads/2022/01/2020-RA-Sustainable-Agriculture-Standard-Supply-Chain-Requirements.pdf>

UK Bribery Act (2010):

<https://www.legislation.gov.uk/ukpga/2010/23/contents>

<https://www.gov.uk/government/publications/bribery-act-2010-guidance>

UK Modern Slavery Act (2015):

<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

<https://www.gov.uk/government/collections/modern-slavery-bill>

United Nations (UN) Conventions & Principles:

UN Universal Declaration of Human Rights

<https://www.un.org/en/about-us/universal-declaration-of-human-rights>

UN Global Compact Principles

<https://www.unglobalcompact.org/what-is-gc/mission/principles>

UN Guiding Principles on Business and Human Rights

<https://www.unglobalcompact.org/library/2>

UN Sustainable Development Goals

<https://www.un.org/sustainabledevelopment/>