

1.0 Ethical Trading

INTRODUCTION

Major customers have included in their supply standards “Ethical Trading / Sourcing Policies” and “Codes of Practice for the Employment of Overseas Workers” that detail expectations of their Trade Partners. These expectations set out minimum requirements based upon the Global Ethical Trade Initiative Base Code (ETI), International Labour Organisation (ILO) Conventions and Sedex (Coles).

These customer policies provide a framework to guide BerryCo purchasing activities. Key objectives of the policy are to:

- Communicate to its suppliers, the BerryCo approach to ethical purchasing;
- State our commitment to the ethical trading Initiative (ETI base code);
- Demonstrate BerryCo’s senior management commitment;
- Communicate to suppliers our social and environmental duties and responsibilities as they relate to the purchasing function.
- Identify the supporting systems which assist BerryCo in implementing our ethical trading strategy.

BerryCo is working with its major customers in increasing efficiencies for the retailer and its suppliers in managing ethical risks and are a participant in the Coles “Sedex ethical data exchange trial”. Additionally, we are required to comply with other retailers Ethical Sourcing Policies and “Codes of Practice for employing Overseas Workers” and are assessed for compliance against these requirements during 3rd Party certification audits.

REFERENCES

- United Nations 1999 Global Compact.
- International Labour Organisation Convention no 138
- Ethical Trading Initiative Base Code.
- Sedex.
- Coles Ethical Sourcing Policies and Codes of Practice.
- GLOBALG.A.P. Risk-Assessment on Social Practice (GRASP)

BERRYCO ETHICAL TRADING POLICY PRINCIPLES

- BerryCo acknowledges their Environmental and Social Responsibility and are also endeavoring to ensure that these same values are embedded in our trade with direct suppliers. BerryCo believes that, as a responsible organisation, it must ensure that the goods its source are produced in a sustainable way from an environmental and social perspective.
- BerryCo believes that it has a moral obligation to ensure that the way in which it sources products does not impact negatively on either the environment or the individuals who produce these goods. BerryCo likewise has a responsibility to uphold its reputation and the value of their brands. BerryCo have made a commitment to manage Environmental and Social impacts through the implementation of Environmental and Ethical Trading Policies.
- BerryCo is committed to ensuring that all the supply chain stakeholders, regardless of where they live or work, are treated with respect and dignity and are able to live in an environment undamaged as a result of production. In basic terms BerryCo is aiming to encourage “Sustainable Development”, and also wants to ensure that those with whom we trade are similarly committed to these principles.
- In developing this policy we recognise that as a commercial entity, we may have a limited sphere of influence in matters of human or labour rights and we have focused on New Zealand Legislation, international best practice, International Labour Organisation (ILO) conventions and on those areas outlined in the UN Global Compact’s 10 principles, from which we have distilled the following areas of focus.

BERRYCO TERMS OF TRADING

- BerryCo conduct their businesses in accordance with traditional core values which include:
 - honesty
 - building long-term stable relationships and
 - not being greedy

- ensuring full compliance with all workplace laws.
- BerryCo will not exercise undue pressure on their suppliers and expect that they act similarly with their suppliers and so on down the supply chain. BerryCo is committed to honoring contractual obligations to suppliers and contractors.
- BerryCo operates a zero-tolerance policy regarding fraud and corruption and seek to make the purchasing process as transparent as possible and are committed to respecting the commercial confidentiality of the information they receive.

BERRYCO ETHICAL TRADING POLICIES

Promotion of Worker Rights and Human Rights in General

- BerryCo recognise people as their key resource and the safety, health and welfare of their employees, customers, members of the public and suppliers and contractors are central to their values.
- BerryCo expect that people working for suppliers will be treated fairly and with respect. BerryCo require that New Zealand Laws and Legislation are observed, but, as a minimum, that international human rights and labour law are applied.

Freedom of Association and the Right to Collective Bargaining

BerryCo and their supplier's employees shall be free to be members of a lawful labour association and shall not be discriminated against as a result.

Hours of Work

BerryCo and suppliers normal work and overtime hours shall not be excessive and shall provide for adequate periods of rest and not exceed those specified in New Zealand legislation and employment Laws.

Wages and the Elimination of All Forms of Forced or Compulsory Labour (Bonded Labour)

- Forced, Compulsory or Bonded labour shall not be used.
- Employees shall receive a fair wage, which, as a minimum, shall comply with national law in the country of employment for that sector.
- Workers are not required to lodge "deposits" or their visa/passports with their employer and are free to leave their employer after reasonable notice.
- Wages and benefits paid for a standard working week meet, at a minimum, New Zealand 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 employees 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 New Zealand law be permitted without the expressed permission of the employee concerned. All disciplinary measures should be recorded.

The Elimination of All Forms of Child Labour

- Children shall not be employed in any situation, which is likely to deprive them of educational opportunities or which places their health safety or welfare at risk.
- New Zealand laws and regulations shall be complied with, but, as a minimum, ILO conventions in respect of Child labour shall be observed.

The Elimination of Discrimination in Respect of Employment and Occupation

Discrimination, in whatever form, on the basis of race, national extraction, social origin, caste, religion, colour, gender, sexual orientation, marital status, age, disability, union membership, or political opinion, is wholly unacceptable.

Health, Safety and Welfare of Employees

- The health safety and welfare of all employees shall be protected. Suppliers shall address risk and comply with New Zealand legislation in this regard.

- 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 in the course of 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 employees.
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.

Sourcing Products from Oppressive Regimes

BerryCo do not intend to involve itself in the internal politics of any country from which it, or contracted suppliers, sources supplies used during its operations, however, where clear evidence of abuses of human rights exist or where trade is used to support the activities of corrupt or oppressive regimes, BerryCo will cease all trade with that country.

The Promotion of Greater Environmental Responsibility

BerryCo are committed to ensuring that all purchasing takes into consideration its environmental impact. In keeping with their views on Sustainable Development, suppliers must, as a minimum, comply with all New Zealand laws and regulations in respect of their environmental impacts.

The Elimination of Corruption, Including Extortion and Bribery

BerryCo are opposed to all forms of corruption, including extortion and bribery and will not engage in such practices nor will it accept its suppliers engaging in corrupt activities.

Transparency and Fairness

BerryCo seek to make the purchasing process as transparent as possible, within commercial and legal constraints. This is to enable suppliers to understand the elements of the purchasing process including the procedures, timescales, expectations, and criteria for selection etc.

COMMUNICATION

Responsibility

The aim of BerryCo is to ensure that this policy is embedded within their daily and supply chain operations. It is the responsibility of suppliers to ensure that their employees are aware of and comply with the requirements of this policy.

Communication

- BerryCo shall communicate the policy clearly and effectively to their employees, contractors and suppliers with the aim of raising awareness of the issues and of best practice.
- BerryCo recognise that their ability to directly influence tradition or custom and practice particularly overseas may be limited, however, they are committed to ensuring that products required, if supplied from an international source are sourced only from suppliers who share their commitment to sustainability.

Inclusion in Operating Procedures

Implementation of this policy shall be through standard operating procedures, which form an integral part of BerryCo operations. Such procedures shall reflect BerryCo's Policy and are required to address;

- Responsibility
- Risk assessment / analysis
- Communication
- Staff Training
- Measures of performance
- Remedial Actions
- Record Keeping

Training / Awareness

- BerryCo will ensure that all relevant personnel are provided with appropriate training and guidelines to raise the awareness of this policy and its requirements that will enable them to apply the relevant aspects of this policy in their work.

- BerryCo will ensure that human and financial resources are made available to enable them to meet their stated commitments.
- BerryCo will not knowingly enter into or continue business relationships where the activities of our suppliers are clearly inconsistent with this policy.

ETHICAL TRADING QUESTIONNAIRE

- Suppliers are to complete and return the Ethical Sourcing Supplier Self-Assessment Record Sheet to graeme@southernproduce.co.nz prior to the commencement of packing.

ETHICAL TRADING POLICY GUIDELINES

POLICY CATEGORY	DETAIL
Policy Principles	<ul style="list-style-type: none"> • Acknowledge Environmental and Social Responsibility. • Ensuring goods sourced are produced in a sustainable way from an environmental and social perspective • Aim to encourage “Sustainable Development”.
Terms of Trading	<ul style="list-style-type: none"> • Not exercising undue pressure on suppliers • Honoring contractual obligations to suppliers and contractors • Operating a zero-tolerance policy regarding fraud and corruption • Committing to respecting confidentiality of the information
Promotion of Worker and Human Rights	<ul style="list-style-type: none"> • Recognising people as its key resource • Recognising the safety, health and welfare of employees, customers, members of the public and suppliers and contractors • Expectation that people working for suppliers will be treated fairly and with respect.
Freedom of Association and Right to Collective Bargaining	<ul style="list-style-type: none"> • Freedom to be members of a lawful labour association and shall not be discriminated against
Hours of Work	<ul style="list-style-type: none"> • Work and overtime hours shall not be excessive and shall provide for adequate periods of rest and not exceed New Zealand employment Laws.
Wages and Elimination of Forced or Compulsory Labour	<ul style="list-style-type: none"> • Forced, Compulsory or Bonded labour shall not be used. • Employees shall receive a fair wage complying with New Zealand employment law. • Workers are not required to lodge "deposits" or their visas / passports. • Workers are free to leave employers after reasonable notice. • Wages and benefits paid for a standard working week meet New Zealand employment legal standards. • All employees shall be provided with written and understandable Information about their employment conditions. • Deductions from wages as a disciplinary measure shall not be permitted. • Deductions shall not be permitted without the expressed permission of the employee.
The Elimination of all Forms of Child Labour	<ul style="list-style-type: none"> • Children are not to be employed in any situation, which is likely to deprive them of educational opportunities or which places their health safety or welfare at risk. • New Zealand employment laws and regulations shall be complied with.

POLICY CATEGORY	DETAIL
The Elimination of Discrimination in Respect of Employment and Occupation	<ul style="list-style-type: none"> • Banning discrimination, in whatever form, on the basis of race, national extraction, social origin, caste, religion, colour, gender, sexual orientation, marital status, age, disability, union membership, or political opinion.
Health Safety and Welfare	<ul style="list-style-type: none"> • The health safety and welfare of all employees shall be protected. • A safe and hygienic working environment shall be provided. • Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work. • Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new employees. • Access to clean toilet facilities and to potable water. • Prohibiting physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.
The Promotion of Greater Environmental Responsibility	<ul style="list-style-type: none"> • Commitment to ensuring that all purchasing takes into consideration its environmental impact and that suppliers as a minimum, comply with all New Zealand laws and regulations.
The Elimination of Corruption Including Extortion and Bribery	<ul style="list-style-type: none"> • Stated opposition to all forms of corruption, including extortion and bribery.
Transparency and Fairness	<ul style="list-style-type: none"> • Making the purchasing process as transparent as possible, within commercial and legal constraints.