



# Responsible Partner *Policy (RPP)*

*Publication Date:*





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# Introduction: Our Responsible Partner Policy

Our *Responsible Partner Policy* (RPP) and its *Fundamental Principles* embody our commitment to **responsible, transparent and sustainable business**.

**This commitment is at the core of The Magnum Ice Cream Company's (TMICC) sustainability strategy, which sets out how we enable growth, strengthen resilience and deliver meaningful business impact and value.**

Our RPP outlines what TMICC requires of business partners so we can work together responsibly. This is more than just compliance – this policy is designed to build stronger, more resilient businesses. By embracing continuous improvement, our approach adapts to the evolving nature of our partners and value chains, while driving growth and delivering better outcomes for people and the planet.

Our business partners encompass upstream suppliers of materials, providers of all types of services, such as creative and media agencies, as well as downstream distributors and customers. We aim to work with those who are committed to upholding the Fundamental Principles of our RPP within their own operations and throughout their value chains. We also expect our business partners to encourage their own partner(s) to adopt and apply these same principles.

Violations of this RPP may put a business partner's relationship with TMICC at risk, up to and including termination. TMICC reserves the right to audit a business partner's compliance with the RPP, request attestations, and require the implementation of corrective action plans where necessary.

Business partners are required to follow any additional requirements outlined in any other agreement, policy or guidelines of TMICC. In addition, as international and industry best practices continue to develop, TMICC expects its business partners to enhance their social and environmental compliance programmes in line with these developments.





# Introduction: Our Responsible Partner Policy

## Respecting *human rights* and fighting *corruption*

**In line with the UN Guiding Principles on Business and Human Rights, which we committed to respecting internationally recognised human rights across our business.**

Our commitments and policies, including the Fundamental Principles of our RPP, are aligned with the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and we support the OECD Guidelines for Multinational Enterprises.

We put this into practice through due diligence processes and management system requirements within our RPP.

We are committed to conducting business with integrity, upholding the highest global standards, and fighting corruption in all its forms. We expect our business partners to share these values and principles, too.

## Protecting and preserving the *environment*

We are committed to conducting business in a way that embraces sustainability and strengthens our positive impact on the environment. This means managing our operations – and the sourcing, manufacturing, distribution, and supply of products and services – in ways that protect and preserve the environment.

Our Fundamental Principles for the Planet focus on the areas where TMICC can make the greatest difference: reducing negative impacts, while maximising positive impact. Here we address environmental sustainability, with an emphasis on climate, water, waste, biodiversity, no deforestation and plastic.

We are equally committed to working with our business partners to achieve the Fundamental Principles of our RPP, while recognising our own responsibilities within this journey. We also acknowledge that delivering on these commitments requires more than cooperation with our business partners: it calls for collective, industry-wide effort.

Together, our ambition is for TMICC and its business partners to drive collaboration and lasting change.

- **Jean Olivier Quentin**, Chief Procurement Officer OR
- **Palmina Fava**, Chief Integrity Officer





# The different elements of our *RPP*

Each Fundamental Principle of our RPP provides guidance on what TMICC expects of our *responsible* and *sustainable* business partners.

## *Mandatory Requirements*

- The minimum requirements you must meet in order to be a TMICC business partner.

## *Mandatory Management Systems*

- The appropriate policies, processes and procedures that you must have in place and implement in order to achieve and maintain the Mandatory Requirements. The type and complexity of management systems required will depend on the size, type and risk profile of your business, with consideration of the severity of the impact of those risks.

## *Future Mandatory Requirements*

- These are requirements that are not yet mandatory in order to do business with us, but will be mandatory in the future. We include these requirements here to give you advance notice, as we recognise that achieving them may take time. Our timeline for implementing these requirements, and who they apply to, can be found at <https://corporate.magnumicecream.com/en/suppliers.html>. We will update this information as we work towards implementation together, so timelines may change and be accelerated or extended.

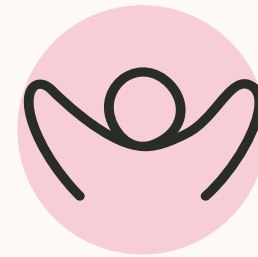
## *Leading Practices*

- These are examples of the practices that companies can work towards as part of continuous improvement.

The Fundamental Principles of our RPP are organised into three main pillars:



*Business Integrity & Ethics*



*Human Rights*



*Planet*

**We recognise that these three pillars are increasingly interconnected and interdependent, and therefore you need to consider them together to meet the requirements.**

Where your contract or product specification with TMICC includes a requirement to meet a higher standard than our RPP, that higher standard will take precedence over our RPP.

As a TMICC business partner, there are certain countries to which you may supply goods or services, or do business in, that require you to meet additional, specific mandatory standards or to fulfil other legal obligations relating to Business Integrity & Ethics, Human Rights and Planet. These additional requirements and legal obligations must also be adhered to as Mandatory Requirements of our RPP. These requirements and obligations are set out in our Implementation Guidance document, which accompanies our RPP.



# Fundamental Principles

You are expected to determine and take responsibility for the steps required for your organisation to be able to meet or exceed the **Mandatory Requirements of our RPP**. The Implementation Guidance provides you with examples of effective steps and additional information on approaches to help you achieve and sustain the Mandatory Requirements. This guidance document should be read alongside our RPP.

## Pillar 1: *Business Integrity & Ethics*



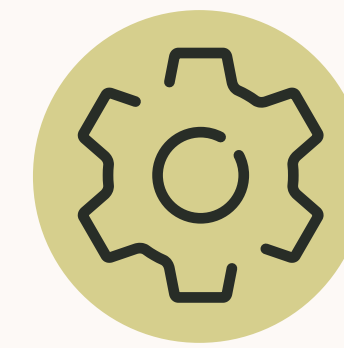
### Legal Compliance, Countering Corruption & Money Laundering

Business partners comply with relevant laws and regulations, and have a zero-tolerance approach to all forms of corruption and money laundering.



### Safeguarding Information & Property

Information is protected, whether that information derives from TMICC or from its competitors, and personal data is collected, processed, stored, transferred and disposed of responsibly.



### Sourcing and Manufacturing Products

Products and materials supplied to TMICC are appropriately and responsibly sourced and tested and meet agreed specifications.

## Pillar 2: *Human Rights*



### Freely Agreed Terms of Employment

Work is conducted on the basis of freely agreed and documented terms of employment.



### Free from Discrimination

All workers are treated equally and with respect and dignity, without any form of discrimination.



### Free from Harassment

All workers are free from harassment and abuse.



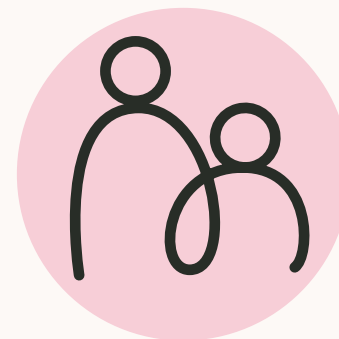
# Fundamental Principles

## Pillar 2: Human Rights



### Work is Voluntary

Employment is accepted and work is conducted on a voluntary basis.



### Appropriate Age

All workers are of an appropriate age and young workers are protected.



### Fair Wages

All workers are paid fair wages.



### Reasonable Working Hours

Working hours for all workers are reasonable.



### Freedom of Association

All workers are free to exercise their right to form and / or join trade unions and to bargain collectively.



### Health and Safety

All workers operate in a safe and healthy work environment that identifies and reduces risks to prevent accidents, injuries and illnesses.



### Access to Grievance Mechanisms & Remedies

All workers have access to grievance mechanisms, with fair procedures and remedies.



### Land Rights

The rights and title to property and land of the individual and local communities are respected.

## Pillar 3: Planet



### Protect and Regenerate Nature

Business is conducted in a manner which protects, preserves and regenerates nature, including biodiversity.



### Climate Action

Greenhouse gas (GHG) emissions are reduced in line with the goals of the Paris Agreement.



### Waste-free World

The generation of waste is reduced and zero waste to landfill is achieved.





# Who does our *RPP* apply to?

## Who is in scope of our RPP?

- **All** 'Tier 1' suppliers, defined as those who invoice TMICC for goods or services.
- **Companies** in any tier that do the work that TMICC contracts from a Tier 1 supplier.
- **Any** supplier beyond Tier 1 who has a contract with TMICC, or whom TMICC has expressly appointed to provide goods or services to the Tier 1 supplier, even where they do not directly invoice TMICC.
- **Companies** distributing and / or selling on behalf of TMICC, inclusive of agents, franchisers and importers.
- **Customers** and business partners that TMICC directly contracts with to bring our products to TMICC's consumers around the world, inclusive of retailers and digital commerce.
- **Charities**, NGOs and social enterprises who receive funding or product donations from TMICC.

## Who in the business?

### Everyone in your company, including:

- **All** employees of your company, including shareholders and board members.
- **All** parts of your company, divisions and operations.
- **All** group companies.
- **Contracted** workers or services employed by your group companies to enable the running of your company (for example: contracted workers for manufacturing, security, catering, janitorial and other services).

### People you sub-contract work to, including:

- **Sub-contractors** of services doing the actual work that TMICC is being invoiced for, including self-employed workers or people in the 'gig-economy'.
  - **Sub-contractors** of raw materials or goods that TMICC is sourcing, including through traders, brokers and / or agents.

Throughout our RPP, we generally refer to 'business partners'. In places where our RPP refers specifically to 'suppliers', those sections do not apply to other business partners.

In addition to the requirements listed above, we expect you to extend equivalent standards throughout your supply chain by conducting human rights and environmental due diligence. This includes identifying, preventing, mitigating and accounting for potential and actual adverse impacts on people and the planet that are directly linked to your operations, products or services through your business relationships, as well as those you may cause or contribute to through your own activities.

## What type of business?

- **All** types of business, regardless of size and number of employees.



## Your *Policies*, Not ours

- **The Mandatory Requirements** represent the minimum threshold that you must meet in order to do business with TMICC.
- **You are not** expected to 'sign up' to TMICC's RPP, but instead to confirm to TMICC that you can and do meet or exceed the Mandatory Requirements through the application of your own policies and practices.
- **Dependent** on size and risk, you are expected to have your own policies, training, governance and compliance programmes in place to ensure that they are known and fully implemented within your organisations, and that all employees and workers know, respect and observe your company's policies.
- **If you do not** yet have your own policies in place, you are free to make use of our RPP in creating your own policies, tailored to the scope of work and activities that you perform. We do not have a copyright on our RPP for this reason.
- **You do not** need to inform TMICC if you change your own policies or practices, unless those changes mean that you are no longer able to meet the Mandatory Requirements.

**The Mandatory Requirements are aligned to international standards, regulations and conventions that are widely used. They are also similar to expectations by other companies.**







# How we conduct *due diligence* and *verify alignment* with our RPP

**We verify alignment to, and achievement of, our RPP's Mandatory Requirements and Mandatory Management Systems** through self-declarations, due diligence scans, online assessments and independent third-party audits at high-risk sites. Risk assessments take into account the business size, the types of goods or services supplied, and the country of operation, using data from external expert organisations.

Third-party audit processes are tailored to the type and size of each business, as well as the goods and / or services provided. TMICC applies industry-leading audit methodologies, which support mutual recognition and reduce the need for multiple, overlapping audits. This allows us and our partners to focus on addressing any identified issues, rather than repeating assessments.

Information on our audit requirements and on which audits and audit companies are accepted can be found at <https://corporate.magnumicecream.com/en/suppliers.html>.

For suppliers of key agricultural materials, our requirements are defined in TMICC's Sustainable Agriculture Principles (SAP) and accompanying SAP Scheme Rules. Where suppliers of agricultural raw materials have undergone audits against SAC or SAP-benchmarked equivalent standards of their facilities, this is considered as sufficient verification of our RPP. Where there is no audit of facilities as part of the SAC or SAP-benchmarked equivalent standards, high-risk sites will require an audit to verify alignment with our RPP.

TMICC's due diligence process also includes other means of assessment, such as impact and risk assessments. These are designed to identify and prevent any negative impacts on business integrity, human rights, and the environment, particularly for those most at risk, for example, children, women, migrant workers, indigenous peoples and communities. Where issues arise, we are committed to ensuring remediation. We expect our business partners to undertake the same approach.

We encourage you to contact the TMICC team if you encounter challenges in meeting these requirements when implementing your own approaches. We will endeavour to provide support and guidance. We also welcome the sharing of insights that can strengthen the TMICC Responsible Business Programme and the way it is governed and monitored across our value chain.

In the spirit of partnership, we aim to collaborate in a pre-competitive environment to address systemic challenges across our industries. If you have any questions or comments, please contact us at: <https://corporate.magnumicecream.com/en/suppliers.html>.







# Pillar 1:

## *Business Integrity & Ethics*





# 1. Legal Compliance, Anti-Corruption & Money Laundering

*All relevant laws and regulations are complied with and there is a zero-tolerance approach to all forms of corruption and money laundering.*

## Mandatory Requirements

### *Compliance with laws*

- **1.1** All laws and regulations are complied with and required permits are held for the countries where the business partner operates, as well as for all other applicable international laws and regulations.

### *Anti-bribery & anti-corruption*

- **1.2** All forms of corruption, including bribery, extortion and embezzlement are strictly prohibited and must be prevented through adequate and proportionate procedures. This prohibition applies to bribery of **Public Officials** or private sector officials or individuals, as well as facilitation payments and other forms of corruption (such as fraud or theft). Any breach of this requirement in connection with TMICC business is promptly disclosed to TMICC.
- **1.3** A **business partner** is prohibited from offering or accepting anything of value to TMICC employees to improperly obtain or retain business or any other improper advantage.
- **1.4** TMICC employees are prohibited from soliciting any improper advantages from our business partners. A business partner must report any attempt by TMICC employees to solicit bribes from business partners through our Speak Up channels at <https://uk.core.resolver.com>.

### *Gifts and hospitality*

- **1.5** Gifts, donations or hospitality offered to TMICC employees must never be intended to influence business decisions or how TMICC assesses performance or awards future business. Any such offerings must be legitimate, proportionate and in line with TMICC's internal policies, which place strict limits on the acceptance of gifts and hospitality.

### *Avoiding conflicts of interest*

- **1.6** All business transactions are free of actual, potential or perceived conflicts of interest. Any material ownership or beneficial interest in a business partner's company by a Public Official, representative of a political party, TMICC employee or their relatives, are declared to TMICC prior to any business relationship with TMICC, so that appropriate action can be taken.
- **1.7** Any other conflict of interest in any business dealings with TMICC, of which the business partner is aware, is declared to TMICC, to allow TMICC the opportunity to take appropriate action.

### *Accurate records, insider trading, anti-money laundering and economic sanctions compliance*

- **1.8** All business and commercial dealings are conducted transparently, accurately recorded and reported in a timely manner.
- **1.9** **Material**, non-public information in the business partner's possession regarding TMICC – or any other company – is not used to either engage in or support insider trading.
- **1.10** All applicable economic sanctions, anti-money laundering and anti-tax evasion laws and regulations must be complied with. Any suspicions of such issues in relation to transactions with TMICC are reported promptly to us, and effective steps must be taken to mitigate associated risks.



# 1. Legal Compliance, Anti-Corruption & Money Laundering

## Mandatory Management Systems

### *For all mandatory requirements:*

- **1.11 Systems** are in place to ensure regular communication with employees on business integrity, ethics and compliance, led by senior leadership.
- **1.12 Processes** are in place to identify, assess and monitor key risks, and to take appropriate action to respond, taking into account company size, country of operation, business activities and the external environment.
- **1.13 Internal** policies and guidance are developed based on key risks and communicated to employees as appropriate, given company size.
- **1.14 Training** is provided to address key risks and to embed a culture of integrity.

### *Specific to accurate records, insider trading, anti-money laundering and economic sanctions compliance:*

- **1.15 Financial** procedures ensure the proper recording of all financial transactions and facilitate the identification of any suspected money laundering, tax avoidance and breach of economic sanctions activities.
- **1.16 No** undisclosed or unrecorded account, fund or asset is established or maintained.

## Future Mandatory Requirements

### *Compliance with laws*

- **1.17 All** relevant laws are complied with as they become binding on business partners operating in, or supplying to, applicable jurisdictions.

### *Leading Practices*

- **1.18 Public** positions are taken to advance business integrity and engage in collaborative actions, where appropriate.
- **1.19 Independent** risk assessments and audits are performed, and any gaps are identified and remediated.
- **1.20 Communication** and training for employees are tailored to identified risks and past cases. The effectiveness of training is measured.





## 2. *Safeguarding Information & Property*

*Information must be protected, whether it comes from TMICC, its competitors, or other parties. Personal data must be collected, processed, stored, transferred and disposed of responsibly.*

### **Mandatory Requirements**

#### *Protecting TMICC's information and property*

- **2.1 Confidential** information, know-how and intellectual property belonging to TMICC or any other party are respected and safeguarded, even after the end of a business relationship with TMICC.
- **2.2 All** information provided by TMICC or another party that is not publicly available is deemed confidential and must only be used for its intended and designated purpose.

#### *Competitor information*

- **2.3 All** competitor information is obtained and used legitimately, in full compliance with all applicable laws and regulations.
- **2.4 No** attempt is made to divulge to TMICC, or to any other party, any commercially sensitive or confidential information about their competitors or the business partner's competitors.
- **2.5 TMICC's** commercially sensitive or confidential information is not to be used for other business purposes or shared with any third party, unless expressly permitted by TMICC.

#### *Data ethics and privacy*

- **2.6 Personal** data is collected, processed, stored, transferred and disposed of in line with applicable laws and with respect for the protection of privacy as a human right.
- **2.7 The** risks to individuals when handling personal data is always considered. Steps are taken to mitigate these risks and to ensure that personal data is collected and used solely for its intended purpose.

### **Mandatory Management Systems**

#### *Protecting TMICC's information and property*

- **2.8 Procedures** and mechanisms are in place to ensure that all confidential information, whether business or product related, is securely stored, with access restricted on a need-to-know basis only.
- **2.9 There** are procedures and mechanisms in place to ensure that appropriate consent is obtained before disclosing TMICC's or another party's commercially sensitive or confidential information to third parties, or before disclosing such information from third parties to TMICC.

### **Leading Practices**

#### *Data ethics and privacy*

- **2.10 Standards**, processes and governance frameworks are in place for the ethical use of both personal data and artificial intelligence technologies.
- **2.11 Business partners** are transparent about how and why personal data is collected, processed, stored, transferred and disposed of, ensuring information is communicated in a way that enables individuals to make informed choices.
- **2.12 Business partners** can demonstrate that when automated decisions are made that could impact people's lives, there is a clear, explainable and ethical rationale for these decisions.



### 3. Sourcing and Manufacturing *Products*

*Products and materials supplied to TMICC are appropriately and responsibly sourced and tested, and meet agreed specifications.*

#### **Mandatory Requirements**

##### *Product specifications and quality*

- **3.1 Products**, materials and services meet agreed specifications (where applicable), as well as industry quality and safety norms and any additional quality and safety standards as agreed between us. They also comply with all applicable legal and regulatory requirements.
- **3.2 Suppliers** to TMICC are responsible for ensuring compliance with these specifications, quality and safety standards, and legal and regulatory requirements, whether they directly supply goods or services to TMICC or sub-contract to a third party.
- **3.3 Where** relevant, business partners conduct research and development activities responsibly, adhering to good clinical practice and widely accepted scientific, technological and ethical principles.

##### *Animal Welfare*

- **3.4 Business partners** must uphold high standards of farm animal welfare by ensuring humane treatment, appropriate housing, and good health practices throughout their operations. TMICC expects partners to avoid intensive livestock practices that lead to overcrowding, stress, or inadequate care, and to work towards continuous improvement in line with internationally recognised animal welfare principles, and the five Principles outlined in our Sustainable Agriculture Principles.

##### *Responsible sourcing*

- **3.5 The** business partner's own Code of Conduct, guidelines, policies and / or training are in place and accessible to workers, to enable the business partner to meet or exceed the Mandatory Requirements of the RPP.
- **3.6 Business partners** have their own Responsible Partner Policy, Supplier Code, Third Party Policy or equivalent that reflects the principles of the RPP Mandatory Requirements for their own business partners. The business partner's policies place comparable requirements on its own business partners.
- **3.7 Where** the provision of goods or services being sourced by TMICC is sub-contracted to another party, the business partner has in place a Code of Conduct or Responsible Sourcing Policy for these suppliers, consistent with the requirements of the RPP. In addition, there is a process to communicate this and to monitor supplier compliance.
- **3.8 The** business partner exercises and shows human rights and environmental due diligence. This includes identifying, preventing, mitigating and accounting for how it addresses and manages potential and actual adverse impacts, whether caused or contributed to by its own activities, or directly linked to its operations, products or services through its business relationships.

#### **Mandatory Management Systems**

##### *Product specifications and quality*

- **3.9 Procedures** are in place to ensure that any product quality or safety concerns originating from the business partner, or its supply chain, are notified to TMICC without delay.
- **3.10 Supply** and manufacturing partners have procedures in place to meet TMICC's requirements for external certification, where informed prior to contracting

#### **Leading Practices**

##### *Responsible sourcing*

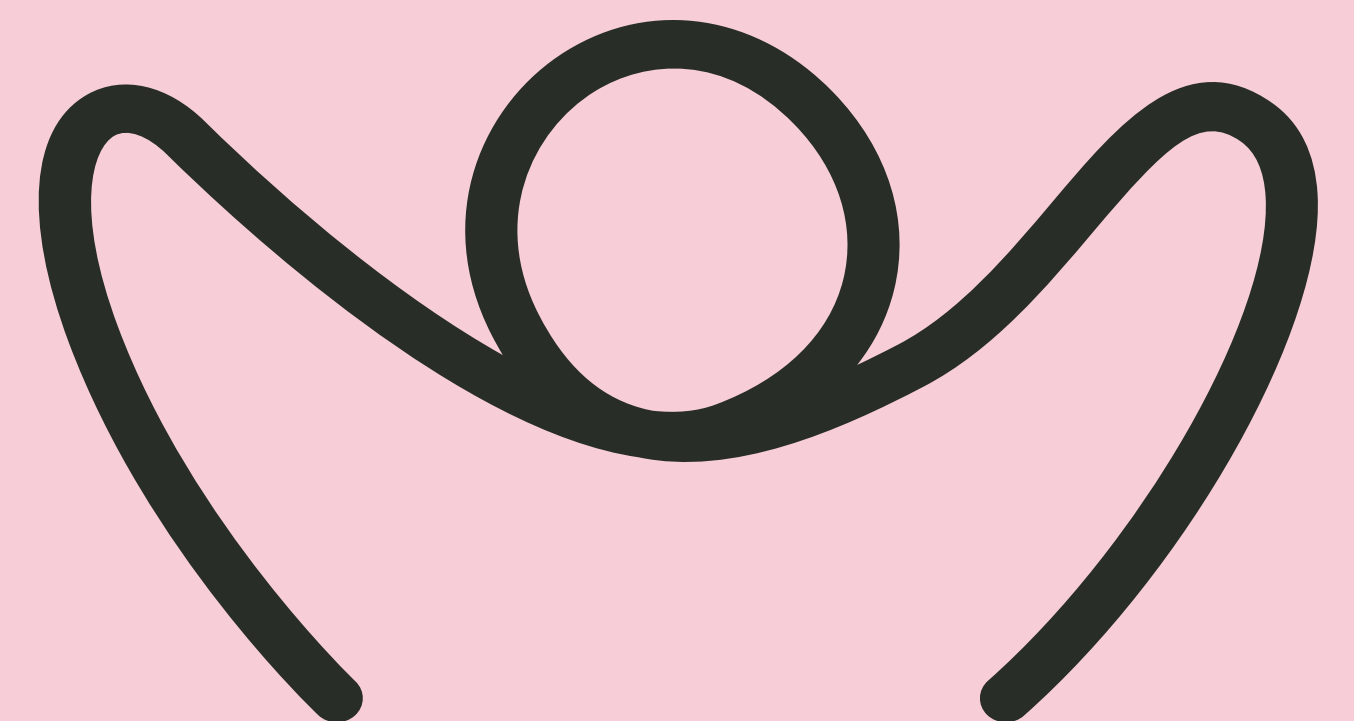
- **3.11 All** business partners have in place a Code of Conduct or Responsible Sourcing Policy for their own supply chain that is consistent with the requirements of the RPP. In addition, there is a process to communicate this throughout their supply chain, and to monitor compliance.





# Pillar 2:

## *Human Rights*





## 4. Freely Agreed Terms of *Employment*

*Work is conducted on the basis of freely agreed and documented terms of employment.*

### ▼ Mandatory Requirements

- **4.1 All** workers, both permanent and casual, are provided with employment documents that are freely agreed and that, at a minimum, respect their legal and contractual rights.
- **4.2 Key** components of employment, including and not limited to, rights, responsibilities, terms and conditions, are freely agreed by the worker, documented in writing, and formally acknowledged by both the employer and worker before the start of employment.
- **4.3 Terms** and conditions of employment are provided in a language the worker easily understands, and are explained verbally or visually, if required. These documents remain accessible throughout employment.
- **4.4 All** workers receive a copy of their employment terms and conditions, in a language they understand, for their records, that matches the version held by the employer.
- **4.5 Any** changes to the terms and conditions of employment are communicated by the employer in accordance with legal requirements.
- **4.6 Where** required by law, short-term, casual or agency workers are hired as permanent employees where the work involved is of a regular nature and is required all year round.
- **4.7 Workers** are entitled to maternity, paternity, adoption or parental protection, leave and benefits as required by law.

### ▼ Mandatory Management Systems

- **4.8 Key** management functions, such as hiring and contracting, grievance management, discipline, promotion and employment termination have clear policy frameworks, procedures for implementation and training of those responsible for implementing them. Appropriate documentation for such processes are also kept.
- **4.9 There** is a clear and transparent system of worker and management communication in place. Employees are always informed of any decision that changes or affects their terms of employment and have the right to engage in meaningful dialogue with management.

### ▼ Leading Practices

- **4.10 All** short-term, casual or agency workers are hired as permanent employees where the work involved is of a regular nature and is required all year round, regardless of legal requirements.
- **4.11 Ongoing** training is provided for all workers to improve and expand their skills and support career development.
- **4.12 Policies** for family leave, recognising all family types, are created and consistently implemented.





## 5. Free from *Discrimination*

*All workers are treated equally, with respect and dignity, and without any form of discrimination. Particular attention is given to protecting the rights of workers who may be most vulnerable to discrimination.*

### Mandatory Requirements

- **5.1 Discrimination** of any kind is prohibited in employment, including recruitment and hiring, training, personal and professional development, compensation, promotion, discipline, employment termination or retirement.
- **5.2 Discrimination** based on race, ethnicity, age, role, gender identity, colour, religion, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social class, union membership, personal characteristics, disease, health status or political views, or on any other grounds protected by local law, is strictly prevented.
- **5.3 Engaging** in, supporting or tolerating discrimination is not permitted under any circumstances.
- **5.4 Pregnancy** testing, health screening that could result in discrimination, and mandatory contraception use are not tolerated. When health tests are mandated under local laws, the results cannot be used to dismiss, discriminate against or otherwise treat workers unfavourably.

### Mandatory Management Systems

- **5.5 Policies** and procedures are established and implemented to prohibit discrimination of any kind throughout the employment lifecycle, including recruitment, compensation, access to training, promotion, termination or retirement. These policies are clearly communicated to all workers and reinforced regularly, including with management.
- **5.6 Selection** criteria for all human resource decisions are objective, transparent and consistently applied, with controls in place to ensure adherence.
- **5.7 Procedures** are in place to ensure that job descriptions and vacancy announcements are written without bias and do not exclude any group, or groups of people, except where specific skills, occupational requirements or training are legitimately necessary to perform the work.
- **5.8 Individuals** responsible for hiring, compensation, training, promotion, discipline and employment termination receive training to ensure fairness and to prevent discrimination in the exercise of their duties.
- **5.9 All** workers, and especially managers, supervisors and site security, are trained to recognise, prevent and respond to discrimination.

### Leading Practices

- **5.10 The** effectiveness of anti-discrimination training and policies is regularly evaluated and processes are in place to identify, address and prevent potential areas of bias or exclusion.
- **5.11 Policies** and specific, measurable targets are established to promote gender equality and diversity. Programmes are implemented to address the needs of workers most at risk of discrimination (for example, under-represented communities, women or people with disabilities). They may cover areas such as flexible working arrangements, childcare and dependant care support and mentoring initiatives.
- **5.12 Diversity**, equity and inclusion criteria are integrated into the evaluation and selection of new suppliers.



## 6. Free from *Harassment*

*All workers are entitled to a workplace free from harassment, abuse and intimidation. No worker is subjected to any physical, sexual, psychological, verbal or financial mistreatment in any form.*

### Mandatory Requirements

- **6.1 Workers** are treated with dignity and respect at all times. Physical, sexual, verbal or psychological abuse, financial exploitation, any form of harassment, hate speech, intimidation, bullying, violence and corporal punishment are strictly prohibited and not tolerated.
- **6.2 Disciplinary** measures are fair, proportionate, and never include physical or psychological punishment.
- **6.3 All** workers, including managers, supervisors and site security, who engage in harassment or abuse are subject to appropriate disciplinary measures.
- **6.4 There** is zero tolerance of any abuse, threats, intimidation or reprisals against human rights defenders.

### Mandatory Management Systems

- **6.5 Policies** and procedures are in place that prohibit any form of harassment or abuse. These are clearly communicated to all workers, with regular training provided on how to recognise, prevent and report harassment and other forms of intimidation.
- **6.6 Written** disciplinary procedures are communicated and explained clearly to all workers, with records of all disciplinary actions maintained for the duration required by law.

### Leading Practices

- **6.7 Programmes** are implemented to promote safety and prevent gender-based violence, both in the workplace and within the surrounding community.
- **6.8 Assessments** are made with harassment prevention in mind when building teams, including consideration given to the importance of supervisory roles. This includes providing specific sensitivity training for managers and supervisors, tailored to the demographic profile (for example gender and race) of the workforce.
- **6.9 Distinct** procedures are in place for cases involving sexual harassment or assault. These take into account the potential trauma and risks involved and ensure access to counselling and other forms of support for survivors.





## 7. Work is *Voluntary*

*Employment is freely accepted and all work is conducted on a voluntary basis. The freedom of movement of workers is respected and never restricted.*

### Mandatory Requirements

- **7.1 Forced** labour is strictly prohibited under all circumstances, including in the form of trafficked labour, indentured labour and bonded labour, as well as mental and physical coercion, and slavery.
- **7.2 Workers** enter employment voluntarily and are never required to surrender any identity documents, personal papers or pay deposits as a condition of their employment.
- **7.3 Workers** have the right to terminate their employment freely, without coercion or penalty, by giving reasonable notice as agreed in their terms and conditions of employment.
- **7.4 Workers** have freedom of movement and are never confined to the business partner's premises, including dormitories or employer-provided housing.
- **7.5 Workers** are not required to pay a fee or deposit in connection with obtaining or maintaining employment, to the employer or to any person, company or agency involved in the recruitment process.
- **7.6 Employers** are responsible for the payment of all fees and expenses associated with a worker obtaining employment or incurred in connection to the worker performing their duties. If workers have paid any fees, these must be reimbursed by the employer.
- **7.7 The** use of prison labour is prohibited, except in circumstances where their terms and conditions of employment uphold the Mandatory Requirements of this policy and can be verified.

### Mandatory Management Systems

- **7.8 There** are formal hiring policies in place and employees are trained in human resources procedures to ensure that workers are entering into employment voluntarily and are free to leave in accordance with agreed notice periods, if they so wish.
- **7.9 Workers** relocating for employment, either domestically or internationally, are made aware of their terms and conditions, as well as their rights, via pre-departure and post-arrival trainings or other acceptable means, in a language that they understand.
- **7.10 Effective** and transparent processes are set up to safeguard workers' freedom of movement, ensuring they are never confined to the facility's premises, including company-provided accommodation or transportation (where either is provided). Such processes extend to the role and responsibilities of security employees, where present.
- **7.11 Policies** and procedures are in place and implemented to identify, prevent and remediate any instances where recruitment fees may have been paid by workers. This includes due diligence in the selection and monitoring of recruitment agencies or labour brokers.

### Leading Practices

- **7.12 Sector-wide** initiatives to promote ethical recruitment are participated in.
- **7.13 Initiatives** to support survivors of human trafficking are supported.

## 8. Appropriate Age

*All workers are of an appropriate age and young workers are protected.*

### ▼ Mandatory Requirements

- **8.1 Under** no circumstances are individuals employed under the age of 15 or under the local legal minimum age for work or mandatory schooling, whichever is higher.
- **8.2 Responsible** remedial measures are immediately implemented whenever any workers under the age of 15 are identified. These measures include immediately removing the child from all work, ensuring their safety and wellbeing, and supporting access to appropriate education. The family's income security is maintained to prevent further hardship.
- **8.3 In all** circumstances, the health, safety and development of young workers (between 15 and 18 years of age) are considered and protected at all times. This protection should preclude them from engaging in certain types of work, such as hazardous or night work, or any form of work that is mentally, physically, socially or morally dangerous or harmful.
- **8.4 The** objectives and requirements set out in the **International Labour Organization (ILO) Convention on the Worst Forms of Child Labour** are fully upheld and implemented.

### ▼ Mandatory Management Systems

- **8.5 An employment** policy covering all workers, including those recruited directly or via an agency or third party, is in place. This policy clearly defines the minimum age for employment, as well as remediation measures if there is an incident of child labour detected. Remediation includes ensuring the child's care, continued education and income replacement. The policy should also outline the conditions under which young workers may be employed.
- **8.6 An effective** age verification process, which includes reliable documentation and record keeping systems, is in place in the workplace to ensure compliance.
- **8.7 All** relevant workers are trained to respect the provisions for young workers, inclusive of apprentices and interns, particularly regarding permitted working hours, night shifts, working hours during school terms and prohibitions on hazardous or physically demanding work.

### ▼ Leading Practices

- **8.8 Community-building** activities that help reduce barriers to access to education are supported. These activities include working with the local government to enable greater school provision, providing workers with an allowance for school expenses, funding school expenses, supporting safe transportation to and from schools and offering vocational training opportunities for the youth.





## 9. Fair Wages

*All workers are paid fair wages in accordance to local legislation.*

### Mandatory Requirements

- **9.1 All** workers receive a total compensation package for a standard working week, including wages, overtime pay, benefits and paid leave, that meets or exceeds all applicable legal minimum standards.
- **9.2 Compensation** terms established by legally binding collective bargaining agreements are implemented and adhered to.
- **9.3 Wages** are paid, on time, regularly and in full, directly to a worker, in line with the applicable laws.
- **9.4 Workers** receive a pay slip for each pay period, clearly indicating the components of the compensation, including exact amounts for wages, specifying regular and overtime hours worked (where workers are paid on an hourly basis) and benefits, incentives / bonuses and any authorised deductions.
- **9.5 Where** a worker is paid based on volume output, piece-rate, quotas or similar, the pay rate allows the worker to be able to earn at least the equivalent of the minimum or collective agreement wage, whichever is higher, during normal working hours.
- **9.6 All** overtime work or work on statutory holidays is paid at the appropriate premium rate according to local legal requirements and / or collective bargaining agreements.
- **9.7 Other** than legally mandated deductions, all other deductions from wages are made only with the express and written consent of the worker, in a language they understand.
- **9.8 All** legally mandated deductions, such as taxes, social security or health insurance, are deposited each pay period in the legally stipulated accounts or agencies and as required by law.
- **9.9 Insurance** is taken to cover workers in the case of any work-related injuries, accidents, illness, disability or death, in accordance with local labour and compensation laws, as a minimum.

### Mandatory Management Systems

- **9.10 A written** policy on wages and compensation is in place, communicated transparently and explained to all workers in a language they understand.
- **9.11 A process** to understand and monitor legal requirements for wages, overtime pay, benefits, holidays and deductions and to ensure compliance with any changes to these, is in place.
- **9.12 Accurate** records are maintained to demonstrate that workers are paid correctly for both standard and overtime hours worked, based on an appropriate hours and wages recording system.



## 9. Fair Wages

### Future Mandatory Requirements

- **9.13 All** workers employed by business partners directly providing goods and services to TMICC must earn at least a Living Wage or Living Income. A Living Wage must be achievable within normal working hours (not including overtime), whether the worker is paid on a salary, hourly or volume output / piece-rate / quota basis.
- **9.14 A Living Wage** approach is implemented and updated annually to ensure that all workers receive wages (or appropriate portion of income) that continue to meet or exceed the local legislation requirements and the cost of living.

### Leading Practices

- **9.15 A fair** and transparent compensation system is in place for all workers that categorises them according to qualifications, skill and experience. It recognises and rewards performance through both wage and non-wage benefits and / or incentives. Regular reviews and adjustments to pay are conducted against relevant market benchmarks and business performance, as well as engaging in regular social dialogue on compensation questions.
- **9.16 Living Wage** and / or Living Income requirements are actively cascaded to suppliers and to their upstream supply chain.
- **9.17 Insurance** coverage for workers goes beyond work-related statutory requirements, encompassing unemployment, maternity, health and retirement protections.





## 10. Reasonable Working Hours

*Working hours for all workers are reasonable.*

### ▼ Mandatory Requirements

- **10.1 Workers** do not work more than the standard and overtime hours permitted under local legal requirements. In all cases, total weekly working hours, including overtime, must not exceed 60 hours for non-management workers, even where local law allows for more, in order to prevent excessive physical and mental fatigue.
- **10.2 All** overtime is on a voluntary basis. Where employment contracts allow for contractual overtime, workers must provide their explicit consent.
- **10.3 Workers** shall receive all legally mandated benefits, such as paid holiday leave and public holidays.
- **10.4 Workers** are entitled to reasonable meal and rest breaks, which, at a minimum, must comply with applicable laws.

### ▼ Mandatory Management Systems

- **10.5 Written** policies are in place and implemented for standard working hours and overtime; the policies clearly state that overtime is voluntary.
- **10.6 Expected** working hours and schedules are communicated to all workers in a language and format that they understand.
- **10.7 There** are defined and effective systems in place to record, monitor and verify working hours and overtime for all workers, regardless of pay structure (for example, piece-rate payment), employment status or contract type.

### ▼ Leading Practices

- **10.8 All** workers, including those in management roles, do not exceed a total of 60 working hours per week, inclusive of overtime.
- **10.9 Workers** are consulted on ways to reduce overall working hours, without compromising their ability to earn at least a Living Wage.
- **10.10 Working** time arrangements support workers in attending to family and personal needs (for example, time off for medical appointments and flexibility and agility in work hours / shift coverage), without penalty or loss of income.

# 11. Freedom of Association

*All workers are free to exercise their right to form and / or join trade unions and to bargain collectively.*



## Mandatory Requirements

- **11.11 All** workers have the right to form or join legally recognised unions or representative bodies, and to engage in constructive dialogue and good-faith bargaining on matters that affect their employment conditions and workplace rights.
- **11.2 Collective** bargaining negotiations are entered into in good faith upon request from any legally recognised representative body, and resulting agreements are concluded and implemented, as required.
- **11.3 Worker** representatives are not subject to discrimination, retaliation or any form of unfair labour practice as a result of their representative role. They are granted reasonable access to the workplace and resources necessary to carry out their representative duties effectively.
- **11.4 Where** local law sets restrictions on the right to freedom of association and collective bargaining, alternative forms of worker representation, association and bargaining are allowed.



## Mandatory Management Systems

- **11.5 Clear** policies and processes relating to freedom of association and collective bargaining in day-to-day operations are in place. These policies clarify that a worker's choice to form, join or participate in a trade union or representative body will not compromise their equal treatment in any aspect of employment, including recruitment, discipline, promotion, compensation, working hours, grievance handling or termination.
- **11.6 Regular** training of workers, managers and site security guards is carried out to ensure full understanding and respect for the right to freely associate, the principles of collective bargaining and sound industrial relations practice, including effective consultation and negotiation.
- **11.7 Clear** rules governing the activities of recognised trade unions in the workplace are established.



## Leading Practices

- **11.8 When** new policies and procedures are developed, worker representatives are proactively engaged and consulted for input, where possible.
- **11.9 Social** dialogue and joint training initiatives with trade union or worker representatives are arranged to promote constructive labour relations. This may include health and safety programmes, training on workplace equality, and prevention of discrimination and harassment.
- **11.10 Assessments** are undertaken to identify potential risks to workers' rights to freedom of association and collective bargaining. Where risks are identified, measures are designed, implemented and reviewed for effectiveness.



## 12. Health, Safety & Security

*All workers operate in an environment that protects the occupational health, safety and security of employees, where risks are identified, mitigated and monitored to prevent accidents, injuries and illness.*

### Mandatory Requirements

- **12.1 A healthy**, safe and secure workplace is maintained at all times to prevent accidents, injuries, or illnesses (either physical or mental) arising out of, associated with, or occurring in the course of work, or resulting from the employer's operations.
- **12.2 All** workers and any other individuals who enter business premises are clearly informed of workplace hazards and are provided with necessary training, equipment and personal protective gear to mitigate such risks. Clear and appropriate signage and information on how to evacuate in the case of an emergency is accessible at all times.
- **12.3 All** workers, visitors and contractors who enter the premises to provide any operational services or deal with products are properly trained and informed about the appropriate actions to take should a health and safety incident occur.
- **12.4 All** workers have unrestricted access to free, potable drinking water at all times during working hours.
- **12.5 Sanitary** facilities are clean, functional and fully serviced, with hand-washing amenities, running water and soap available for all workers.

### Mandatory Management Systems

- **12.6 Clearly** defined, written policies and procedures for occupational health, safety and security are established, maintained and updated regularly.
- **12.7 Occupational** health, safety and security policies and procedures are widely communicated and cascaded effectively throughout the organisation, with a mechanism to ensure relevant information is provided to all visitors.
- **12.8 Regular** and ongoing safety training, including evacuation drills, is provided to all workers, including managers, supervisors, contract workers and security personnel.
- **12.9 An effective Health & Safety Committee**, with roles that are clearly understood by workers and managers, proportional to the size and risks of the work site, is in place. The Committee should identify, monitor and ensure improvement plans are implemented to reduce health and safety risks, in order to protect workers from work-related accidents, injury and illness.
- **12.10 A senior** member of management is appointed to administer and oversee the health, safety and security plan for each work site.
- **12.11 The** effectiveness of health, safety and security plans is regularly tested through scheduled drills, inspections and other means.

- **12.12 The** structural integrity and fire safety of all operational sites and worker facilities are specifically and regularly assessed, with immediate corrective action taken where deficiencies are identified.
- **12.13 Operations** are regularly inspected and evaluated to ensure ongoing compliance with health, safety and security standards, including areas for equipment and worker housing, where provided.

### Leading Practices

- **12.14 Company-wide** goals and measurable targets to achieve zero accidents are actively monitored and reported on, while continuing to encourage transparent reporting of any incidents or near-misses that occur without fear of retaliation.
- **12.15 A crisis** management plan is in place, including contingency planning and prioritisation of the health, safety and wellbeing of all workers in emergency situations.
- **12.16 Employers** promote, and workers are encouraged to adopt and maintain, good health and safety practices that support both mental and physical wellbeing.



## 13. Access to Grievance Mechanisms & Remedies

*All workers have access to fair, confidential and effective grievance mechanisms that ensure prompt and impartial remedies.*

### ▼ Mandatory Requirements

- **13.1** *All* workers are provided with transparent, fair and confidential grievance procedures that ensure swift, unbiased and equitable resolution of workplace issues. These mechanisms shall be available in a worker's native language and include a formal appeal process for the worker to follow if they disagree with the resolution.
- **13.2** *The* grievance mechanisms comply with the **UN Guiding Principles on Business and Human Rights**. They are well-communicated to all workers and remain accessible in order to enable safe and effective reporting on any issue.
- **13.3** *The* grievance mechanisms guarantee confidentiality, to the extent possible, with the possibility to report grievances anonymously.
- **13.4** *Those* reporting a grievance or participating in any investigation of a grievance must not be retaliated against.
- **13.5** *All* grievances are fully addressed in an effective, timely and respectful manner, and escalated to, and overseen by, the appropriate level of management.

### ▼ Mandatory Management Systems

- **13.6** *There* is a clear, documented and consistently applied process to address any grievance, which ensures confidentiality (unless permission is given by the complainant to disclose to a given person).
- **13.7** *There* is a non-retaliation policy towards workers or whistle-blowers who report grievances, with specific measures to protect complainants from retaliation.
- **13.8** *All* employees receive training on the policy and procedures for handling grievances. Managers and supervisors are specifically trained to handle grievances objectively and to prevent recriminations and retaliation.

### ▼ Leading Practices

- **13.9** *Anonymised* data on the receipt, handling and resolution of grievances is maintained and analysed to assess the efficacy and fairness of grievance mechanisms.
- **13.10** *Root* causes of complaints and grievances, including any related underlying patterns, are identified and used to strengthen prevention measures and inform operational improvements, where appropriate.
- **13.11** *Grievance* mechanisms are widely communicated and accessible in order to enable local communities to report to the company directly on any issue, in line with the **UN Guiding Principles on Business and Human Rights**.





## 14. Land *Rights*

*The rights and titles to property and land of individuals and local communities, including indigenous populations, are recognised, protected and respected. There is zero tolerance for land grabbing or participation in any practice that unlawfully or unethically deprives people of their land.*

### Mandatory Requirements

These requirements apply only to business partners involved in the acquisition, leasing or disposal of land and / or when land use is being changed, which can affect the rights of individuals or communities.

- **14.1 There** must be no direct or indirect involvement in any form of land grabbing and there must be a zero-tolerance approach to land grabbing by others with respect to any land acquired, leased or used.
- **14.2 The** legitimate land tenure rights of individuals, communities and indigenous populations, including customary and informal rights, are respected, and due diligence is undertaken to identify and uphold their established rights to property, land and land use.
- **14.3 When** a change in land use is proposed or planned, the environmental and social impact is assessed and appropriately addressed, with the participation of affected communities, and published in a format and language accessible to those affected communities.

- **14.4 Land** acquisition, land-use planning, change and land development are managed in a way that fully complies with national laws and respects international human rights principles, including customary rights to land and resources, whichever offers the greatest protection.
- **14.5 Women's** right to land ownership and access must be recognised, protected and respected.
- **14.6 Business partners** must actively seek and document the effective implementation of **Free, Prior and Informed Consent (FPIC)** each time land acquisition, land-use planning and change, or land development might affect the legitimate land tenure rights of local communities or affect land otherwise subject to collective legitimate land tenure.





## 14. Land *Rights*

### ▼ Mandatory Management Systems

These requirements apply only to business partners involved in the acquisition, leasing or disposal of land and / or when land use is being changed, which can affect the rights of individuals or communities.

- **14.7 *There*** are written policies on respecting the land rights of all legitimate land tenure holders affected by the business partner's operations, including a zero tolerance for land grabbing.
- **14.8 *An ongoing*** operational due diligence process is in place to effectively identify, prevent, mitigate and account for any violations of land rights in the business partner's operations and how these are addressed and remedied.
- **14.9 *Defined*** roles, responsibilities and sufficient resources are assigned to managing land rights issues and ensuring ongoing company–community engagement.
- **14.10 *Individuals*** responsible for land acquisition or land-use changes are periodically trained on FPIC principles and procedures, and fully understand how to identify and assess the impact of those land-related decisions.

### ▼ Leading Practices

- **14.11 *Impact*** assessments data is disaggregated by gender, national origin, tribe or caste.
- **14.12 *A public*** commitment is made to actively support responsible agricultural investments, full supply chain traceability and adherence to the **UN Voluntary Guidelines on the Responsible Governance of Tenure (VGGT)**.
- **14.13 *Strategic Lawsuits Against Public Participation*** (SLAPPs) used to silence human rights and environmental defenders and civil society organisations that support affected rights-holders in legitimate activism are not engaged in.







# Pillar 3:

## *Planet*





## Planet

*Operations, sourcing, manufacturing, distribution of products and the supply of services are conducted with the aim of protecting and preserving the environment.*

**A risk-based approach should be taken by business partners to determine the environmental issues that present the greatest potential for an adverse impact in connection with their business.**

Fundamental Principle 15 outlines the Mandatory Requirements for holistic environmental management towards protecting and regenerating nature. This is followed by two additional Fundamental Principles that address environmental issues where TMICC and its partners have the greatest opportunity to maximise positive impact in the areas of climate, water, waste, zero deforestation and plastic. You may also identify further areas that are relevant to your businesses.







## 15. Protect and Regenerate *Nature*

*Business is conducted in a manner which protects, preserves and regenerates nature (including biodiversity) and ensures no deforestation or conversion takes place in connection with the supply of cocoa, vanilla, dairy, palm oil, sugar, paper and board materials. Water consumption is reduced, particularly in areas of high-water stress.*



### Mandatory Requirements

- **15.1 All** current and valid legal permits and requirements relating to planning, development and business operations, with respect to the protection of the environment, nature and biodiversity, are held and fully complied with.
- **15.2 All** applicable laws and permits relating to water – including, but not limited to, water abstraction, water usage, surface water management and effluent discharge – are adhered to in every area of operation.
- **15.3 Direct** suppliers of in-scope materials shall only sell materials to TMICC that are sourced from places verified as deforestation and conversion-free, based on the applicable cut-off date.



### Mandatory Management Systems

The following general management systems must be in place in order to meet the Mandatory Requirements for each Fundamental Principle under the Planet pillar:

- **15.4 An environmental** management system is in place, and updated periodically, to identify, monitor and mitigate issues related to water management and wastewater discharge.
- **15.5 Environmental** management policies and procedures are in place and implemented to address issues that present significant environmental risks relating to your business operations.
- **15.6 Due diligence** policies and processes aligned with national and international sourcing requirements are implemented, as required by applicable laws, regulations, and as advised or requested by TMICC prior to purchase, or as otherwise agreed in contract.
- **15.7 Training** is provided to all relevant workers to ensure understanding of, and compliance with, all necessary legal permits and environmental obligations.
- **15.8 All** required environmental and sustainability data is shared with TMICC where needed to allow TMICC to use that data (on an anonymised basis, where the reporting or requirements allow anonymity) to comply with the reporting and disclosure requirements of all relevant human rights, environmental protection and supply chain due diligence laws.
- **15.9 Relevant** policies and procedures are widely communicated throughout your organisation, with appropriate training provided.







## 15. Protect and Regenerate *Nature*



### Leading Practices

- **15.10 Applicable** to suppliers of agricultural materials: TMICC's Sustainable Agriculture principles (SAP) and benchmarked SAP-equivalent programmes and standards are fully implemented.
- **15.11 Suppliers** of agricultural materials identify and implement plans to manage biodiversity and ecosystem risks for operations in or near environmentally sensitive areas.
- **15.12 A systematic** review of sustainability practices and environmental management systems is undertaken regularly, with support from independent experts and with the involvement of local communities, to confirm if appropriate policies and procedures are in place and effective.
- **15.13 Water** abstraction and wastewater generation are measured, monitored and publicly disclosed.
- **15.14 In areas** with a high level of water stress, water optimisation measures, including leak prevention, reduction of water wastage, and advanced wastewater treatment, are implemented.
- **15.15 Collective** action initiatives are engaged in to improve water security, prioritising areas of water stress through implementation of the **Alliance for Water Stewardship (AWS) Standard**.
- **15.16 Stakeholders** across the value chain are engaged to enhance biodiversity and ecosystem performance, both within and beyond site boundaries.







## 16. Climate Action

*Greenhouse gas (GHG) emissions are actively reduced in line with the goals of the Paris Agreement, limiting global warming to well below 2 degrees Celsius, compared to pre-industrial levels.*



### Mandatory Requirements

- **16.1** All applicable legal requirements are complied with and permits are held with respect to GHG emissions management and reduction.



### Future Mandatory Requirements

- **16.2** When requested, footprint data for product-level GHG emissions for the materials sold to TMICC is shared for use by TMICC in public reporting and to authorities on TMICC's own GHG reduction targets. This should be done via an agreed methodology and include third-party verification.
- **16.3** An *environmental* management system dedicated to GHG emissions reduction is in place, implemented and periodically updated to identify and mitigate GHG emissions across all relevant operations.



### Leading Practices

- **16.4** A *public* target and roadmap to reduce GHG emissions in line with the goals of the Paris Agreement and requirements of the GHG Protocol or equivalent standard are set, with progress publicly reported on at least an annual basis. GHG reduction targets are approved by the **Science Based Targets initiative (SBTi)**, through: <https://sciencebasedtargets.org>.
- **16.5** *Upstream* suppliers are engaged with to collectively reduce GHG emissions across the value chain, either directly or via participation in relevant industry groups that advance collaborative action on climate issues (within the bounds of competition law).
- **16.6** *Carbon* credits are used only for residual GHG emissions and after proven absolute reductions in line with SBTi and are reported separately from GHG reductions.





## 17. Waste-free World

*The generation of waste is reduced and zero waste to landfill is achieved. Plastic use and waste are reduced to help create a transparent and circular economy for materials, particularly plastics.*



### Mandatory Requirements

- **17.1** *All* applicable laws and permits relating to the storage, handling and disposal of waste directly or through waste sub-contractors are fully complied with.
- **17.2** *Waste* is stored, handled, transported and disposed of in a manner that protects the health and safety of people and prevents environmental harm.
- **17.3** *All* applicable legal requirements with respect to plastic feedstock sourcing, plastics production, storage, transport and end-of-life management are fully complied with.
- **17.4** *Suppliers* of **Post-Consumer Recycled (PCR)** plastic conduct annual migration testing in accordance with TMICC's standard test method to verify the materials supplied to TMICC fall within the approved limits for contaminants. Appropriate records of these results are also maintained.

**Any contaminant identified above the limit must be risk-assessed and the result communicated to TMICC without delay.**



### Mandatory Management Systems

- **17.5** *An environmental* management system is in place and periodically updated to identify and mitigate issues related to waste management and reduction.

**Applicable to suppliers using plastic in their production processes:**

- **17.6** *Clear* and effective policies and management controls appropriate to your operations are in place to manage plastic production, use and end-of-life treatment and these controls are reviewed and updated periodically.
- **17.7** *A process* to identify and manage the potential adverse environmental impacts and risks (associated with plastic production, usage, reduction, collection and end-of-life management) appropriate to your operations and activities is in place. Appropriate procedures and controls to minimise the identified risks are implemented.



### Future Mandatory Requirements

**Applicable to suppliers of plastic packaging:**

- **17.8** *Suppliers* of plastic packaging only supply plastic that is designed to be fully reusable, recyclable or compostable.
- **17.9** *Suppliers* of plastic packaging must develop and disclose a plastics inventory to support the transparency and traceability efforts (related to plastics) of TMICC or other downstream parties. This includes relevant data, such as virgin fossil-based content, post-consumer recycled content and detail on the ability of the plastic to be reused, recycled or composted.





## 17. Waste-free World



### Leading Practices

- **17.10** *No non-hazardous* waste is sent to landfill sites or incineration without energy recovery.
- **17.11** *Suppliers* of packaging halve the amount of virgin plastic used and optimise the amount of recycled plastic.
- **17.12** *Where* no local waste management legislation exists, steps are taken to ensure that waste management (including by waste management sub-contractors) is conducted in line with international best practices.
- **17.13** *Business partners* establish a long-term plan to apply the '5-Rs' of waste management: **Refuse, Reduce, Reuse, Repurpose, Recycle**.
- **17.14** *Circular* economy principles and approaches to building circular business models are developed.
- **17.15** *For* business partners where food waste is material, a public commitment is made to halve food waste across direct operations by 2030. Baselines, measurable targets and plans for delivery are set and data is disclosed through external indices.
- **17.16** *Effective* plastics usage, reduction, collection and recycling strategies are in place across the value chain.
- **17.17** *Collaboration* and partnerships with industry stakeholders (within the bounds of competition law) are set up to innovate plastic materials and improve end-of-life management with the aim of tackling plastic waste, aligning and developing industry systems, benchmarking and standards, and leveraging enabling technologies.





# Reporting on *Breaches*



## Reporting on Breaches

- **1. Any** failure to meet requirements of our RPP should be reported to TMICC immediately. Failure to do so is a breach of our RPP.
- **2. We strongly** support a culture of speaking up for both business partners and their workers without fear of retaliation against those who report actual or suspected breaches.
- **3. Business partners** and their workers, communities and other stakeholders may report actual or suspected breaches of our RPP (including any failure by a TMICC worker or anyone acting on behalf of TMICC) to TMICC by Hotline or our Speak Up website. Reports can be submitted confidentially and anonymously (where permitted by law). For more information, visit <https://uk.core.resolver.com>.
- **4. TMICC** will investigate any concern raised and discuss findings with the business partner. The business partner shall assist with any such investigation and provide access to any information requested.
- **5. If remediation** is required, the business partner will create and inform TMICC of their corrective action and implementation plans and timeline to effectively and promptly resolve the breach, and prevent such breaches in future.



## Implementation Tips

- **1. Review** your current policies, procedures and practices against the Mandatory Requirements to ensure you are not at risk of any breaches of our RPP.
- **2. Speak** to your TMICC contact to discuss any areas you don't understand or share with us any challenges you may face in meeting the requirements of this policy.
- **3. Familiarise** relevant workers with our RPP and how to report suspected breaches to TMICC.







# Public *Official*



## Who is a Public Official?

An employee of local, national or international government agencies, or government-owned or controlled entities. This term also includes a member of a political party or royal family, a candidate for political office, and an employee of a public international organisation, such as the UN, WTO or UNICEF.

NOTE: This Responsible Partner Policy supersedes and replaces our previous Responsible Sourcing Policy and Responsible Business Partner Policy. Any reference to our Responsible Partner Policy, RPP, Responsible Sourcing Policy, RSP, Responsible Business Partner Policy, RBPP and / or our Supplier Code in any documentation or contracts with the supplier is intended to refer to this Responsible Partner Policy.

For more information on our Responsible Partner Policy, including a glossary and Frequently Asked Questions, please visit

<https://corporate.magnumicecream.com/en/suppliers.html>.

If you are a supplier, you can find more information on Future Mandatory Requirement timelines on the following website

<https://corporate.magnumicecream.com/en/suppliers.html>.





# Appendix

*The following principles*, standards and conventions were used in preparing our **Responsible Partner Policy** and may be a useful source of additional information:

- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- Business Principles for Countering Bribery produced by Transparency International:
  - International Chamber of Commerce Anti-Corruption Guide for SMEs
  - United Nations Sustainable Development Goals
  - Ethical Trading Initiative
- International Labour Organization: [www.ilo.org](http://www.ilo.org) with specific reference to:
  - International Labour Organization Convention on Freedom of Association and Collective Bargaining
  - International Labour Organization Convention on Hours of Work
  - International Labour Organization Convention on Minimum Age
  - International Labour Organization Convention on the Worst Forms of Child Labour
  - International Labour Organization Convention on Forced Labour
  - International Labour Organization Convention on Abolition of Forced Labour
  - International Labour Organization Convention on Equal Remuneration
  - International Labour Organization Convention on Discrimination (Employment and Occupation)
  - International Labour Organization Declaration on Fundamental Principles and Rights at Work
  - International Labour Organization Convention on Maternity Protection

