



# Responsible Sourcing Policy

Flat Iron Steak Limited (trading as Flat Iron) is a restaurant company operating in multiple locations in the UK. Flat Iron acknowledges its responsibility to minimise the ethical, social and environmental impact of its business operations, for the benefit of its guests, stakeholders, local communities and wider society.

Flat Iron also recognises its responsibilities extend beyond its own operations and that it has a duty to ensure its suppliers conduct their business practices responsibly. In support of this, Flat Iron have developed a responsible sourcing policy to ensure that:

- Products are sourced responsibly.
- Employees of Flat Iron that are responsible for purchasing are clearly guided to make informed decisions.
- Suppliers are held to the highest standards of behaviour concerning ethical, social and environmental responsibilities.
- Flat Iron's reputation is protected.

This policy outlines the minimum standards and basic principles of cooperation that Flat Iron expect of all its suppliers and partners. Suppliers may also be required to comply with specific additional policies and standard where relevant to the product sourced.

## Flat Iron's Commitment to Responsible Sourcing

We are committed to upholding the human rights and fair working conditions of all people associated with Flat Iron, and to minimising the environmental impact of the business.

We endeavour to operate responsibly in accordance with the law and, as per the expectations of our employees, customers and key stakeholders, we will continue to hold ourselves to the highest legal, moral, ethical and environmental standards, which we believe to be an essential requirement to the continued success of the business.

We are committed to working effectively with the community in which we operate, and with our suppliers, to ensure that the requirements of this policy are clearly understood.

We commit to reviewing this policy on an annual basis or at any time that the standards outlined are no longer compliant with the expectations of the law.

## Expectations of Flat Iron's Suppliers

This policy sets out the minimum standards that we expect of our Tier 1 suppliers to comply with when supplying products to Flat Iron Steak Limited.

We acknowledge that our supply chain is global and that many suppliers are subject to different laws and socio-economic circumstances in their local operating environment. However, many of the requirements outlined in this policy are drawn from the United Nations Universal Declaration of Human Rights and the Conventions of the International Labour Organisation, and we expect suppliers to support the principle of this policy and to match or exceed the minimum standards outlined.

In the situation that suppliers are not compliant with the minimum standards, we expect them to document a credible plan to become compliant within a reasonable timeframe. In the circumstance that non-compliance continues, we reserve the right to review any agreement in place, up to and including termination.



## **1. Compliance with the Law**

- Compliance with all laws and regulations within the country in which the supplier operates.
- Compliance with all other applicable international laws and regulations including those related to international trade, data protection and anti-trust/competition laws.

## **2. Bribery**

- Suppliers associated with Flat Iron must not engage in any form of bribery, corruption, extortion or embezzlement.
- Suppliers must ensure that adequate procedures are in place to prevent bribery in all commercial dealings undertaken.
- Where suppliers provide gifts and hospitality to employees of Flat Iron, they must ensure that they are kept reasonable in nature and in no way seek to influence Flat Iron's decision-making with regards to its commercial associations.

## **3. Freedom of Association**

- Workers, without distinction, have the right to join or form trade unions (or other comparable, legal organisations) of their own choosing and to bargain collectively. They may do so without fear of intimidation or reprisal or harassment, as per the law.
- The employer adopts an open attitude towards the activities of trade unions and their organisational activities and ensure that workers' representatives are not discriminated against and that they will have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under Law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

## **4. Working Conditions**

- 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 in the working environment and a record of health and safety incidents shall be maintained, with an action plan to improve performance within a reasonable timeframe.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Access to clean toilet facilities and to clean and drinkable water and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- Where it necessary to ensure the health and safety of workers, suppliers will ensure that personal protective equipment is provided and that workers are trained to use it effectively. Safeguards on machinery must meet or exceed local laws.
- Suppliers shall assign responsibility for health and safety to a senior management representative.

## **5. Forced Labour**

- Under no circumstances will a supplier use forced labour, whether in the form of compulsory or trafficked labour, indentured labour, bonded labour or other forms.
- Mental and physical coercion, slavery and human trafficking are prohibited.

## **6. Child Labour**



- We will not associate with any suppliers that do not meet appropriate employment ages as set out in ILO Convention 138; minimum of 15 years for regular employment in developed countries and 14 in developing countries. Persons aged under 18, shall not be employed at night or in hazardous conditions
- Suppliers must maintain formal documentation that verifies the age of each worker.
- Suppliers must comply with, or exceed, all relevant child labour laws in their country of operation.
- Suppliers have a moral duty to not employ young people in such a way that it is detrimental to their education, mental well-being, physical health or social development.

## **7. Fair Wages**

- Wages and benefits paid for a standard working week must meet, as a minimum, the national legal standards, or industry benchmark standards, whichever is higher.
- Where workers are required to work overtime, they should be paid at a premium rate compliant with the national legal standards.
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure or any deductions from wages not provided for by Law shall not occur without the expressed permission of the worker concerned. All disciplinary measures should be recorded effectively.

## **8. Working Hours**

- Working hours must comply with any Law and benchmark industry standards, whichever affords greater protection.
- Workers shall not be required to work in excess of a basic 48 hours per week.
- Overtime (above 48 hours) shall be voluntary, not be excessive, not be demanded on a regular basis and always be compensated at a premium rate. Workers may refuse to work overtime without fear of disciplinary action.
- Reasonable annual leave must be afforded to each employee based on a clear and formal policy, that must meet, or exceed, relevant legislation in the country of operations.

## **9. Regular Employment**

- Work performed must be on the basis of a recognised employment relationship established through national law and practice.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting or home working arrangements, or through apprenticeship schemes, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

## **10. Discrimination**

- Suppliers will, as a minimum, meet or exceed local laws regarding equality of employment opportunities.
- Suppliers will practise no discrimination in hiring, compensation, training, promotion, termination or retirement based on race, caste, nationality, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation or any other protected characteristic.

## **11. Humane Treatment**

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- Suppliers will record any incidence of harsh or inhumane treatment and develop action plans to prevent future violations.



- Disciplinary actions arising from inhumane treatment must be fair, proportionate, fully compliant with local laws and clearly recorded.
- Workers must have access to a process for whistle-blowing which should be documented in a written policy.

## **12. Entitlement to work**

- Only workers with a legal right to work in the country of operations shall be employed or used by the supplier.
- All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original identity documentation.

## **13. Fair Procedure and Remedies**

- All workers are provided with transparent, fair and confidential employment policies and procedures that result in a swift, unbiased and fair resolution of workplace or employment issues.

## **14. Environmental Compliance**

- Suppliers and their facilities must comply with all relevant local, national and international legal requirements regarding environmental stewardship.
- Suppliers are expected to reduce, or minimise, their use of fossil fuels (natural gas, f-gases, coal etc.), by employing regular monitoring and improvement practices. It is a preference that suppliers purchase renewable energy either by direct supply or via certification.
- Suppliers are expected to reduce, or minimise, water usage and waste water in their operations and wider supply chain.
- Suppliers and their facilities are expected to minimise all forms of waste (including food waste) arising from their operations and to dispose of safely in accordance with local environmental laws and regulations.
- It is expected that suppliers work to reduce, or minimise, the impact of packaging that leaves their facilities and ends up with Flat Iron.
- Suppliers are expected to have conducted an environmental risk assessment of any facility they operate and to have necessary controls in place to minimise any risk to the environment.
- Where relevant, suppliers are expected to have documented policies and procedures in place that seek to minimise the environmental impacts of agricultural practices, including but not limited to deforestation, biodiversity and soil health. It is expected that these are regularly reviewed and that workers are trained to use them effectively.
- Suppliers are encouraged to set a similar responsible sourcing policy for their own supply chain and to set similar, or exceed, the standards as outlined in this policy.

## **15. Animal Welfare**

- As appropriate to the product supplied, suppliers must be able to reasonably demonstrate that they operate high standards of animal health, welfare and husbandry, both for animals reared for food and in other circumstances, where animals may be used within the supply chain e.g. for work and transportation.
- As a minimum, we require our suppliers to ensure that their farmers and producers comply with EU and UK animal welfare legislation including statutory livestock codes of practice: Animal Welfare Act, the Welfare of Farm Animals standards and EU Council Regulation and Directives relating to specific animal welfare standards for each species. Additionally, animals should be humanely stunned prior to slaughter.

## **Compliance with this Policy**

Flat Iron Steak Limited expect suppliers to comply with all aspects of this policy and expect that compliance with the standards, as outlined, will be regularly reviewed or audited at any time.



Further to the standards outlined, we encourage suppliers to take necessary steps to continuously improve the effectiveness of any relevant policies and processes that align to this policy. Suppliers are encouraged to ensure robust governance is in place to regularly review their compliance with local laws and the standards as required by this policy, and to ensure that training is given where required to maintain compliance.

Signed:

A handwritten signature in black ink, appearing to read 'Fred Smith', written over a horizontal line.

**Fred Smith, Head of Beef**

October 31 2023