

## Supplier Assurance and Sustainable Procurement Policy

### 1.0 Introduction

This policy serves to combine Indigo Food Group's requirements both in terms of supplier assurance and sustainable procurement. It also serves to represent both our internal policy and the code of conduct our direct suppliers must follow.

Indigo Food Group believes in the importance of engaging suppliers that are actively working to mitigate any negative environmental or social impacts of their operations.

Commercial dealings both for Indigo Food Group and its end customers are founded on respect for human rights, protection of the environment and ensuring safety, legality, authenticity and product quality both in our own operations and our supply chains.

Our Supplier Assurance and Sustainable Procurement Policy applies to all Indigo Food Group's businesses including:

- BM Foods Limited
- Winning Blend Limited trading as The Welsh Pantry
- Edgmond Foods Limited

The scope of this policy includes food, packaging and labour agencies.

By agreeing to Indigo Food Group's terms and conditions suppliers, as the direct contracting party, assure us that they have read and understood this policy and agree to take active, targeted and proportionate measures to rule out violations of this policy along their supply chains.

The Procurement Team at Indigo Food Group is responsible for drafting the policy, presenting annual objectives to the Group Directors and developing initiatives and tools to improve the company's performance.

This policy will be reviewed regularly by our Procurement Team, and all changes will be communicated to suppliers.

Our target, published in our Sustainability Report 2025, is to update our supplier assurance process to respond to evolving customer requirements by the end of 2026.

## **2.0 Our approach to ensuring compliance**

Indigo Food Group's approach to compliance is to take active, targeted and proportionate measures to rule out violations of this policy along our supply chain.

We will circulate a supplier assurance questionnaire on a regular basis for completion by the supplier.

In the event of any non-conformances with these requirements in the supply chain, Indigo Food Group has the right to investigate further.

By adopting this approach, Indigo Food Group ensures we meet both our own standards and those of our customers.

At a minimum, the supplier must:

- confirm who in the supplier's business is responsible for adhering to this policy.
- make efforts to identify any non-conformance risks in its supply chain and communicate them to Indigo Food Group.
- develop a plan to mitigate any risks identified and ensure compliance with this policy.
- upon request, provide relevant documentation to evidence the policy is being adhered to.
- demonstrate planned actions and timelines to resolve and monitor any non-conformances identified.

Where a major non-compliance is identified with a supplier, Indigo Food Group reserves the right to cease trading.

We recognise that suppliers are the subject experts and we are committed to working in collaboration with suppliers and customers to improve the sustainability of our supply chains.

## **3.0 Our Quality Standards**

### **3.1 Quality and technical**

All raw materials must be approved and certified as meeting the Brand Reputation Compliance Global Standards (BRCGS) or a Global Food Safety Initiative (GFSI) standard. A controlled list of approved suppliers will be maintained by Indigo Food Group based on the outcome of the supplier approval process. This controlled list will be used by our procurement team, on intake and by product development to ensure only approved suppliers are used.

Only in exceptional circumstances would a raw material supplier without appropriate BRCGS certification be considered for approval. This may be the case where we want to encourage small local producers who could bring added value to the supply chain. A supplier audit to confirm product safety by a qualified technical person is required as a minimum.

Where an emergency supplier is required a documented process of risk assessment, mitigation and appropriate communication to the customer will be completed.

Where the direct supplier is an agent or broker, they will be BRCGS certified, and the name and address of the manufacturing site will be obtained as part of the approvals process.

Our storage and distribution suppliers will be BRCGS (storage & distribution) approved.

Agreed specifications will be in place for all food ingredients and packaging.

All ingredients and primary packaging will be inspected on delivery based on a risk assessment to verify it meets the key criteria of the specification.

Where a process is outsourced, the supplier must undertake their own risk assessment and notify Indigo Food Group. Subcontractors will be approved based on having BRCGS or GFSI certification to verify that product safety (Hazard Safety and Critical Control Point - HACCP), authenticity and legality will not be compromised, and that the HACCP plan fits with our own. A documented and agreed service specification / contract combined with testing will be used to verify compliance to product safety, authenticity, and legality. In line with customer requirements a documented communication of the outsourcing will be made to them.

Suppliers will be made aware of any product characteristics which may affect the packaging suitability when looking at potential purchases. Packaging suppliers will provide either migration test results which meet our product characteristics or certificates of conformity that meets food safety legislation with any limitations of use.

## **4.0 Our Human Rights and Ethical Trade Standards**

### **4.1 Human rights and ethical trade**

Indigo Food Group is committed to operating in an ethical manner to protect human rights and working conditions. We do this through regular review and publication of our modern slavery and human trafficking statement which is published on our business websites and can be found [here](#). We are working towards meeting the Ethical Base Code principles which can be found [here](#) and have already met the majority of the principles. We expect our suppliers to do the same. The Ethical Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will work to the same high standards.

All suppliers are required to be SEDEX registered and have completed a self-assessment. SEDEX can help suppliers gain visibility along their supply chains and improve business performance.

Where this is not the case with our current suppliers, an agreed transition period will be allowed, providing progress can be demonstrated.

The supplier agrees to share their self-assessment and/or SMETA audit on request. Where concerns have been identified e.g. in a region or country, a SMETA audit is expected and any major non-conformances shared with Indigo Food Group at the earliest opportunity.

As part of compliance with our customers' policies, Indigo Food Group may be required to participate in Human Rights Impacts Assessments along its supply chains. A Human Rights Impact Assessment (HRIA) is a process applied to systematically identify, predict and respond to the potential human rights implications of a business operation, government policy or trade agreement. On request, the supplier must work collaboratively with Indigo Food Group to complete these assessments.

Indigo Food Group requests that all suppliers report any concerns along its supply chain at the earliest opportunity to an Indigo Food Group Director.

All suppliers meeting the criteria published [here](#), must publish an annual modern slavery statement to meet the requirements of the Modern Slavery Act 2015.

The supplier shall put in place suitable measures to check whether, within its own business domain or at immediate upstream suppliers from which it procures goods, migrant or agency workers are employed either directly (contract between upstream supplier and worker) or indirectly (contract between upstream supplier and a third party). The supplier must advise upstream suppliers that they have a best effort obligation to transition migrant or agency workers to permanent employment.

If it employs migrant and/or agency workers, the supplier must endeavour to understand the International Labour Organization (ILO) guidelines for fair recruitment and undertake suitable measures to prevent violations including suitable redress for suppliers who found to be in violation of these guidelines throughout its supply chain.

We expect our suppliers to take account of ILO guidelines in its dealings with upstream suppliers to ensure the entire supply chain is aware of its obligations to adhere to these guidelines. Suppliers must ensure that within its own business domain and its immediate upstream suppliers that the wage cost component of the agreed prices fully covers at least the payment of statutory wages and production costs.

## **4.2 Health & Safety**

All suppliers must implement suitable measures to ensure that all legal health and safety requirements at the workplace are complied with not only in its own business domain, but also at immediate upstream suppliers.

### **4.3 Grievance procedures**

We encourage all suppliers to ensure they have effective grievance procedures in place and be able to provide details of these procedures if requested. This includes providing staff with a confidential whistleblowing telephone number or email address.

### **4.4 Termination of the Business Relationship**

All suppliers must have a transparent process for terminating the business relationship with a tier one producer (the supplier's immediate upstream supplier) which forms part of the Indigo Food Group supply chain. We encourage suppliers to ensure that employees of the terminated business, receive outstanding pay and any continued wage payments to which they are entitled by law as part of this process.

## **5.0 Our Environmental Standards**

### **5.1 Carbon reduction**

Indigo Food Group have set a target to achieve net zero by 2050 at the latest. Our carbon footprint analysis shows that over 90% of the carbon we generate comes from our supply chains. Therefore, we ask that suppliers set their own carbon reduction target and develop and implement a plan to achieve it. We encourage suppliers to measure their carbon footprints on an annual basis, and to set a Science Based Target.

Indigo Food Group will analyse its scope three carbon footprint to identify the suppliers making up most of the emissions. To help us calculate this accurately, we request suppliers share their latest carbon footprint to: [sustainability@indigofoodgroup.co.uk](mailto:sustainability@indigofoodgroup.co.uk). We will work collaboratively with suppliers who are identified as being part of the group making up the majority of our supply chain carbon emissions, to jointly drive down carbon emissions for mutual benefit.

### **5.2 Deforestation and land conversion.**

It is recognised that deforestation is a major environmental concern. Some of the products Indigo Food Group sources may be associated with deforestation and forest conversion and may therefore endanger valuable ecosystems. Of particular concern are direct extraction of wood (cellulose), the cultivation of oil palms, soya (both in product and used in animal feed), rubber, coffee and cocoa and clearing to create pastures for cattle.

As a Bakery and Meat processing business we place importance of procuring verified deforestation and conversion free products and we have set a target that none of our raw materials will be sourced from land converted or deforested after 31st Dec 2020 on an ongoing basis. We ask that our suppliers support us in achieving this target. Specifically, we ask that:

- suppliers of products containing raw materials purchased from the above commodity supply chains endeavor to obtain information about indigenous peoples and their existing land use rights in the production of the raw material used and to provide evidence that free, prior and informed consent (FPIC) was obtained. Such consent must be obtained by upstream suppliers for all communities and indigenous groups affected by activities in connection with deforestation and forest conversion in these supply chains. Documentation proving such consent may be requested by Indigo Food Group on behalf of its customers.
- suppliers commit to ensuring that no raw materials in its supply chains were produced on land that was converted or deforested after December 31st, 2020. This applies to both certified and non-certified raw materials. Where barriers to ensuring this exist, we request that suppliers highlight them to Indigo Food Group by emailing [sustainability@indigofoodgroup.co.uk](mailto:sustainability@indigofoodgroup.co.uk) and a transition plan can be agreed between both parties.

### **5.3 Certified and Segregated Palm Oil**

All suppliers must commit to supplying only palm oil that is 100% RSPO certified and from segregated sources.

### **5.4 Certified Soy**

Suppliers must support Indigo Food Group in its commitment that none of our raw materials will be sourced from land converted or deforested after 31st Dec 2020.

With regards to soy, this means soy used in animal feed and in product must hold Round Table on Responsible Soy (RTRS) Version 4.0 certification or later, or a similar scheme that provides evidence that raw materials have not been sourced from land converted or deforested after 31<sup>st</sup> December 2020. As noted above, where barriers exist, we request that suppliers highlight them to Indigo Food Group by emailing [sustainability@indigofoodgroup.co.uk](mailto:sustainability@indigofoodgroup.co.uk) and a transition plan can be agreed between both parties.

### **5.5 Raw Materials Risk Assessment**

Indigo Food Group will risk assess all potential raw materials to ensure they meet our standards. These risk assessments will be in relation to allergens, physical contaminants, microbiological hazards, chemical hazards, fraud, species / variety cross-contamination, quality, and any specific legislative controls related to the raw material. All suppliers must work collaboratively with us in this process, providing all information needed.

### **5.6 Specific raw material standards**

Suppliers are encouraged to participate in recognised animal welfare standards and certification schemes. All suppliers must commit to supply meat that is certified to a recognised Farm assurance scheme as agreed with Indigo Food Group's customers.

Genetically modified (GM) raw materials or ingredients will not be purchased unless they have been approved by regulatory authorities in the country of sale and are supported by scientific evidence of their safety and benefits. Our customers will approve this as part of the pack labelling requirements.

Irradiated raw materials or ingredients will not be purchased unless it is required by law or is necessary for the safety of the product.

## **6.0 Packaging**

Packaging specifications will be provided to suppliers by Indigo Food Group. Packaging supplied must conform to all applicable UK laws and regulations.

### **6.1 Maximising design for recyclability and use of recycled content.**

All suppliers are requested to work towards ensuring 100% recyclability, optimising packaging weight, maximising recycled content within the limitations of the packaging requirements set.

### **6.2 Eliminating problematic plastics.**

All suppliers are required to ensure that they do not include any problematic plastics found on WRAP's problematic plastic list found [here](#). This list evolves regularly and therefore we ask that our suppliers check it regularly.

## **7.0 Waste prevention and management**

Waste prevention and the ability to manage waste in a manner that ensures the least carbon impact is of importance to Indigo Food Group. In line with this, we have adopted the waste hierarchy. An overview of the waste hierarchy can be found [here](#). We encourage all suppliers to adopt the waste hierarchy to minimise impacts along the supply chain.

## **9.0 Non-compliance**

Where a non-compliance is identified we will, in the first instance, try to work with the supplier to resolve it but we reserve the right to stop procuring where overcoming the non-compliance is not possible.

## **Endorsement and Approval of this Statement**

This statement has been approved by the Group Directors who are committed to ensuring Indigo Foods Group operates in a safe, legal, ethical, sustainable, and authentic way.

Mark Woodington

Peter Hobbs

Group Director

Group Director

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Eddie Condon

Group Procurement Director

Handwritten signature of Eddie Condon in black ink.