

ETHICAL TRADE POLICY

Author:	Human Resources		
Document Reference:	BFHRPO17		
Revision no.	0.5	Publish Date:	February 2026
Document status:	Current		
For use by:	All employees of Burgess Farms and its subsidiary Companies		
Purpose:	To communicate understanding to all employees of Burgess Farms Limited commitment to compliance with the ETI base code.		
This document supports: <i>Standards and legislation</i>	ETI Base Code Equality Act 2010 Employment Rights Act 1996 Data Protection Act 1998 & 2018 (GDPR)		
Key related documents:	BFPHRPO23 Human Rights Policy		
Review date:	Next review: Changes to legislation / Changes to Company policy		



Contents

Definitions	3
1. Policy Statement	3
2. Scope & Responsibility	3
3. ETI Base Code Principles	3
4. Produce World Group Limited Commitments	4
5. Labour Agencies (UK)	4
6. High Risk Countries	4
7. Modern Slavery Act	5

Definitions

“**Company**” means Burgess Farms

“**Subsidiary Companies**” Means all Companies owned by Burgess Farms Limited

1. Policy Statement

Burgess Farms is fully committed to establishing the principles of socially responsible trading and to ensuring fair treatment for all workers at our sites and in our supply chain. We aim to work towards compliance with the Ethical Trading Initiative (ETI) Base Code and this will regularly be independently assessed by SMETA-format audits of our sites. In addition, we support measures such as Stronger Together in order to go beyond minimum compliance levels.

The ethical trade principles apply to our supply chain and the way we trade with growers and suppliers. We require confirmation of compliance with ETI as part of the grower approval process and this is monitored as part of our due diligence process.

Burgess Farms will seek to understand risks of modern slavery and human trafficking within our sites and throughout our supply chain. We will take steps to assess and manage any risks identified. Training is provided to managers to help identify ethical issues and provide support to our sites and suppliers in any corrective action that is required.

2. Scope & Responsibility

The overall scope of this policy covers all raw materials subsequently sold to our customers as finished goods i.e. fresh produce and packaging, transport and other bought in services.

The Head of Group Compliance is responsible for the ethical trade policy and compliance, supported by an Ethical Steering Committee. This group will meet at least every 6 months.

The Site Lead/Director for each site is responsible for the overall compliance with the ethical trade policy at Burgess Farms sites. Further responsibilities have been defined by the steering committee.

All employees (at Burgess Farms and our suppliers), benefit from good ethical practices being adhered to and therefore all employees are encouraged to highlight any areas where improvement can be made.

3. ETI Base Code Principles

The Ethical Trading Initiative (ETI) is in place to identify, develop and promote good practice with respect to implementing codes of labour practice. It is a standard code and format that is agreed and implemented to ensure that ethical standards are employed in relation to the supply chain throughout our business and on to our customers.

“The provisions of this code constitute minimum standards and the code should not prevent companies from exceeding these standards. Companies applying this code are

expected to comply with national and other applicable law and where the provision of the law and this base code address the same subject, the company should apply the provision which affords the greater protection.” (ETI Base Code)

Burgess Farms commits to working to the following principles of the ETI Base Code:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

All primary and secondary sites must be Sedex registered and have fully completed the self- assessment questionnaire (SAQ), with review at least every 6 months.

4. Burgess Farms Commitments

1. To have in place an up to date Ethical Trade Policy which is approved and regularly reviewed.
2. To support the Stronger Together initiative and ensure related information is communicated to staff as part of induction and regularly thereafter.
3. To communicate the principles of the ETI Base Code to all employees, suppliers and contractors.
4. To ensure all suppliers are members of Sedex and have completed the self- assessment questionnaire.
5. To undertake third-party ethical audits on a regular basis at Burgess Farms sites and on an annual basis of our labour providers used by Burgess Farms sites.
6. To monitor all labour providers used by Burgess Farms and our growers via the GLA ‘Active Check’.
7. To ensure that appropriate resources are made available to meet our commitments.
8. To train all those visiting supplier sites in ethical trade and to specifically cover agency labour during their visits
9. To report on steps taken under the Modern Slavery Act 2015.

5. Labour Agencies (UK)

All labour providers which are used by Burgess Farms will be subject to an independent audit every year by a member of the Burgess Farms HR Team to ensure compliance with the GLA regulations. Any non-conformances will be actioned promptly.

Our grower approval system registers all labour providers used by our suppliers, should any UK licence be withdrawn, the supplier will be notified immediately.

6. High Risk Countries

Produce purchased from high risk countries will be monitored on a regular basis to

determine political, ethical and PR risks. All sites within high risk countries will be subjected to a scheduled ethical audit.

7. Modern Slavery Act

Burgess Farms will report on performance under the Transparency in Supply Chains Clause requirements. This will include commentary on organisation structure, policies in relation to slavery & human trafficking, supply chains at risk of slavery & human trafficking legislation, social conditions, steps taken to assess and manage risk and training available to staff.

In addition, a Modern Slavery statement will be placed on our website detailing key performance indicators to assess its effectiveness and will be reviewed on an annual basis. This policy was approved by the Board of Burgess Farms

Signed



James Barker
CEO