

# **AZZURRIGROUP**

**BUSINESS CODE OF CONDUCT 2021**

## **Introduction by Stephen Holmes, Chief Executive**

The Azzurri Group is a market leader in the Italian casual dining sector. The Group employs over 4,000 people, serving over 13 million meals a year in our growing estate of over 200 restaurants and shops.

We source ingredients from growers and suppliers all over the world, and recognise our responsibility to support and protect the workers in those supply chains so that we continue to deliver safe, quality meals to our customers in a responsible manner.

We ask all of our direct and indirect suppliers to commit themselves to our Business Code of Conduct, which is consistent with internationally agreed conventions on workers' rights and the Ethical Trading Initiative (ETI) Base Code.

Our intention is to see this code adopted as minimum and not maximum standards and our suppliers are encouraged to use this code as the basis of driving and developing continuous improvement throughout their supply chains and associated communities they operate in. Whilst we recognise understanding is required in certain local circumstances, it is important to note that all our suppliers must firstly comply with all relevant national and applicable law. In instances of duplication of themes between law and this code of conduct, suppliers are asked to apply provisions which afford the greater protection.

### **Scope**

The Azzurri Group are committed to the letter and spirit of the Modern Slavery Act and this code of practice is one of the measures we are introducing to demonstrate our commitment.

The requirements outlined in this document apply to all suppliers across The Azzurri Group business portfolio and are in addition to all applicable local, regional and international legislation and industry best practice, as well as other relevant documented The Azzurri Group policies and procedures. It is our suppliers' responsibility to ensure that they comply with all relevant law to ensure they deliver safe, quality and legal ingredients, raw materials and products to The Azzurri Group and its subsidiary Brands.

### **Our principles**

At The Azzurri Group, the integrity of our business is fundamental to our principles, ensuring we continue to deliver safe, quality products to our Customers sourced in a responsible way. We are dedicated to trading on fair, ethical and transparent terms and actively seek to work with suppliers who strive towards the same values we operate with.

## Code of conduct

This code of conduct constitutes minimum and not maximum standards and we therefore ask our suppliers to not restrict themselves from going above and beyond compliance to this code, and we encourage them to do so.

This code of conduct is built upon the foundations of the Ethical Trading Initiative Base Code ([www.ethicaltrade.org](http://www.ethicaltrade.org)), an internationally recognised code of labour practice, founded on the conventions of the International Labour Organisation (ILO) ([www.ilo.org](http://www.ilo.org))

### **1. Employment is freely chosen**

There must be no forced, bonded or involuntary prison labour and no workers should be required to pay deposits or lodge their identity papers with their employer. All workers are also free to leave their employer after reasonable notice.

### **2. Freedom of association and the right to collective bargaining are respected**

All workers must have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall adopt an open attitude towards trade union activities, and where the right to freedom of association and collective bargaining is restricted under law, the employer should encourage in parallel, the development of independent and free association and bargaining. All workers representatives must have access to carry out their functions in the workplace and must not be discriminated against.

### **3. Working conditions are safe and hygienic**

The working environment must be safe and hygienic (considering industry and specific hazards) and appropriate steps shall be taken to minimise the risk of accidents or injuries to health arising from the working environment. All workers must receive adequate, consistent and regular health and safety training, with new or reassigned workers repeating the training as necessary.

Toilet facilities must be clean and access to potable water is imperative. If food storage is required, sanitary facilities shall be provided. Company provided accommodation, if relevant, shall be clean and safe and meet the needs of workers.

The employer shall assign a senior manager to be responsible for the health and safety of all workers.

### **4. Child labour shall not be used**

Child labour must not be used and companies shall develop or participate in policies and programmes which provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child. Children and young persons under 18 shall not be employed at night or in hazardous conditions and all policies and procedures shall conform to the provision of relevant ILO standards. A child is any person under the age of 15 unless there is a higher local, minimum working age.

## **5. Living wages are paid**

Wages and benefits paid for a standard working week must meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. Wages shall always be enough to meet basic needs and to provide some discretionary income. All workers, prior to employment, shall be given written and legible information about their wages, and relevant conditions of pay. It is not permitted to deduct employees' wages as a disciplinary measure, and any deductions from wages must be in line with national law or with written permission from the employees affected. All disciplinary measures should be recorded.

## **6. Working hours are not excessive**

Workers shall not be expected to work in excess of 48 hours per week or less if there is a lower national limit or an agreed industry norm. Overtime shall be voluntary, and it shall be paid at a rate recorded in a Contract of Employment or in accordance with national legislation.

There shall be proper provision for rest and sleep. Breaks, holiday allowance and rest periods shall be in full accordance with national law. Individual workers shall have on average at least one full day's rest per 7 days or the equivalent if shift work is involved.

## **7. No discrimination is practised**

No discrimination (based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation) shall be practised in the hiring, training, promotion, termination, retirement or compensating workers.

## **8. Regular employment is provided**

Work performed must be on the basis of recognised employment relationships established through national law. Legal obligations to provide benefits or employment rights shall not be avoided through the use of subcontracting, home-working, apprenticeships (where there is no real intent to impart skills or provide regular employment), labour-only contracts or excessive use of fixed-term contracts of employment.

## **9. No harsh or inhumane treatment is allowed**

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited and the company must take steps to ensure that managers ensure this does not happen.

## **10. Bribery, corruption, gifts & entertainment**

Suppliers should prohibit the offering, promising, giving, soliciting, requesting, or accepting of bribes and take a zero tolerance approach to anyone involved in any form of corruption. A bribe is the offer of a financial or other advantage, including excessive hospitality, intending that advantage to influence that person's views or ability to perform a relevant function or to reward a person for their behaviour.

## **11. Protection of the environment**

Suppliers are responsible for complying with any local and national legislation regarding their environmental impact of their facilities.

Suppliers should minimise the use of energy, water and raw materials; minimise waste and effluent and dispose of it in a safe, efficient, and environmentally responsible manner.

## **12. Food Safety (applicable on to suppliers of foodstuffs)**

All suppliers are expected to ensure that food supplied to The Azzurri Group is produced in legal, safe and hygienic conditions. All food supplied to The Azzurri Group shall conform to contractual specifications and records demonstrating this shall be made available upon request to The Azzurri Group. The Azzurri Group Technical Policy outlines the food safety and quality assurance requirements of all suppliers who will be asked to confirm compliance with the policy.

## **13. Food Fraud (applicable only to suppliers of foodstuffs)**

Any supplier not GFSI Certified must conduct regular vulnerability assessments to counter food fraud in their supply chain and must report any suspected activity to The Azzurri Group.

## **14. Responsibilities and accountabilities**

Suppliers must appoint a senior member of their management team to be:

- a Responsible for ensuring their business is compliant with this code of conduct
- b Responsible for communicating the code to their internal colleagues and suppliers, any subcontractors or independent service providers
- c Accountable for monitoring compliance within their own business, supply base, subcontractors and independent service providers to this code of conduct
- d Accountable for immediately contacting their relevant Azzurri Group contact, should there be any issues or violations that impact their compliance with this code of conduct, either confidentially via email ([ethics@azzurigroup.co.uk](mailto:ethics@azzurigroup.co.uk))
- e Suppliers are also responsible for the prompt reporting of actual or suspected violations of law, confidentially via email ([ethics@azzurigroup.co.uk](mailto:ethics@azzurigroup.co.uk))

The Azzurri Group will actively monitor compliance with this code and reserve the right to conduct announced and unannounced on-site independent third-party audits of supplier's facilities, operations, and record keeping and conduct confidential worker interviews in connection with such audits. However, it is the suppliers' responsibility to implement this code and due diligence processes further down its own direct supply chains. Suppliers are encouraged to become members of SEDEX and participate.

Upon receipt of any unsatisfactory audit results and supplier's failure to implement recommended corrective actions, The Azzurri Group, in its sole discretion, reserves the right to suspend any purchases from the supplier until corrective actions are implemented, or to terminate its relationship with that supplier.

This code of conduct will be reviewed by The Azzurri Group at least once every two years.

## **Transparency**

By complying with this Code or Practice, the supplier shall adopt a transparent approach to working with The Azzurri Group. Occasionally upon request, it is important that the supplier shall disclose relevant safety, quality and sustainability policy and procedures as well as geographical locations of facilities and Country of Origin of key raw materials supplied to The Azzurri Group.