**Corporate Social Responsibility (CSR) Policy**

Huntapac Produce is committed to its Corporate Social Responsibility through all aspects of its operations and activities. To this end we have brought together a series of operating principles under the broad heading of Corporate Social Responsibility (CSR) to serve as a guide to employees in all aspects of their work for the company.

The policy can be divided into six main areas:

1. Ethical Business Conduct

2. Policies Specific to Employees

3. Policies Specific to the Group

4. Fair Employment Practices

5. Workplace Health and Safety

6. Environmental Policy

**1. Ethical Business Conduct**

**A. Our Principles**

We value the principles of fairness, accountability, honesty and integrity in all aspects of our

business. Our policy is to conduct our business in a manner which ensures:

• fair treatment of all employees and clients

• transparency of our business policies and practices

• high standards in all matters relating to health, safety and the environment

• ethical business practices throughout our operations and supply chains

We recognise that the involvement of our employees is key to the future success of the Business. We are also committed to best practice in employment matters, recognising the role this plays in attracting and retaining staff.

To succeed in delivering the best possible service to our clients, every employee is expected to adhere to the group’s core values and to uphold them in the workplace. Employees are expected at all times, to exercise the highest ethical judgement and comply with laws applicable to their duties.

**2. Policies Specific to Employees**

**A. Compliance with Codes and Regulations**

In addition to Huntapac Produce ltd internal operating principles employees shall adhere to all national laws and regulations.

**Whistle Blowing**

In the event that an employee discovers a breach of company policy there is a facility for him/her to report that breach in confidence either via his line manager or via contact to a whistle blower hotline (07966388256). Maliciously motivated reports for which there is no real basis for making a report are not welcomed and may result in disciplinary action being taken against the employee making the accusation.

**B. Outside Interests**

Huntapac Produce Ltd. requires that employees avoid at all times any situation which may involve a conflict of interest between the employee and the company. Any potential conflict of interest should be reported to HR for transparency and monitoring.

**C. Dealing with Customers, Stakeholder and External Parties**

The company is committed to the provision of accurate information and fairness in all its dealings with customers, stakeholders, officials and any other external party having direct business with the group.

**D. Confidentiality (Including Data Protection)**

Every employee shall respect any information which is confidential to the company including, but not limited to confidential knowledge or any information concerning the process or invention used by Huntapac. Breaches of confidentiality may be cause for disciplinary action.

We are committed to complying with the data protection principles established by 2018 Act on Data Protection. All employees are responsible for ensuring compliance with the policy. Upon request, an individual will be informed of the existence, use and disclosure of his or her personal data and will be given access to that data to confirm its accuracy or amend it as appropriate.

**E. Malpractice**

The Company actively works to deter malpractice in its workplace, with specific attention to activities involving bribery and corruption, fraud, money laundering and insider trading.

**F. Use of Company Information / Assets**

Employees shall use the company’s computer systems, internet and intranet, and email systems for business use. Any employee found to have disclosed confidential information, been abusive or malicious in using these facilities, or misusing the systems in any way may face disciplinary action.

**G. Disciplinary Procedure**

The Company has a detailed formal disciplinary procedure, full details of which are contained on the Company’s Employee Handbook.

**3. Policies Specific to Huntapac Produce ltd.**

**A. Political Contributions**

It is the Company’s policy not to make contributions for political purposes. However, employees are not hindered from being politically active in their own time using their own resources.

**B. Corporate Governance**

**1. Organisation**

The Board of Directors currently comprises of 7 Directors. The board members are as follows:

Managing Director: Warren Hunter

Director: Jason Hunter

Operations Director: Will Hunter

Director: Henry Hunter

Commercial Director: Steven Kay

Technical Director: Stephen Shields

Financial Director: Graham Bradburne

**2. Internal Controls**

Graham Bradburne (Finance Director) assists in the controls of finances in line with the wishes of the Board of Directors.

**C. Community Investment**

Huntapac Produce seeks to actively engage in local and national community projects, schools and educational authorities. Huntapac has invested into local sports groups / teams and also supported the Wildlife and Wetlands Trust on a number of projects at the Martin Mere site. The company also has a policy encouraging staff to donate their time to local projects / charities. The company donates weekly to local schools and foodbanks, and supports local community events through fundraising and food donations. The company has a nominated charity partner – The Douglas Cardiac Trust.

**Charitable Donations**

The company donates to various charities these may come from the Board, from employees, and from individuals and groups out with the company. Each proposal will be considered on its merits.

**Benefits of Community Involvement**

As Huntapac Produce ltd becomes more involved in the community the company may be invited to propose or participate in new projects.

**4. Fair Employment Practices**

In formulating employment policy, Huntapac Produce Ltd has been guided by the relevant legislation in the United Kingdom. In line with this, openness, sustainability, and respect for employees’ rights is encouraged at all times. The development of these policies in this area is the responsibility of the Huntapac Human Resources Manager. The policies cover all employees including temporary, Seasonal and agency staff.

All staff employed will have in place an agreed contract of employment.

**Equal Opportunities Employer**

The Company is committed to providing equal opportunities to all workers and job applicants. It aims to ensure that no job applicant shall receive less favourable treatment on the grounds of sex, marital status, sexual orientation, gender reassignment, race, colour, religion or belief, nationality or ethnic or national origin. The company will not treat an employee or job applicant less than favourably for a reason relating to their disability or part time or fixed term status unless this can be justified. The Company will also take all reasonably practical steps to ensure that disabled applicants or workers are able to participate in its business activities on an equal basis with people who are not disabled.

As Huntapac Produce Ltd is a Food Production Business, the Food standards Agency (FSA) guidance document *“Food Handlers: Fitness to Work*” will be used alongside all existing employment legislation as a means of best practice employment for a Food Business Operator.

The company fulfils its obligations to any persons with medical conditions or mobility issues, it provides suitably trained first aiders, all of whom have been trained in First Aid at Work (3 day) course. The Equality Act 2010 is fully complied with and is a driver for the business when recruitment takes place.

All employees are responsible for complying with this policy and for ensuring that the standards of behaviour required by the company are observed by:

• Treating others on their merits and disassociating themselves from any form of direct or indirect discrimination, victimisation or harassment.

• Bringing to the attention of their Departmental Manager any suspected working practise in breach of this policy.

• Working together to promote a harmonious working environment free from discrimination, harassment and bullying.

The Company regards direct or indirect discrimination, victimisation and harassment as a serious matter. Employees who fail to comply with this policy will be subject to the Company’s disciplinary procedure. All breaches of this policy will be regarded as serious disciplinary matters and will, if there has been victimisation, intentional discrimination or deliberate harassment be regarded as potential gross misconduct leading to summary dismissal.

The Company recognises that misunderstandings can arise where people of a different sex, interests and cultures work together. Any employee who believes that he or she is being treated in a way that is contrary to this policy should raise the issue with their Departmental Manager. If an employee feels that it is inappropriate to approach their Departmental Manager he or she may contact the Human Resources Department.

**A. Human Rights**

Huntapac Produce applies the Ethical Trading Initiative (ETI) Base code guidelines to all relevant aspects of employment practices and worker welfare. Where Labour is sourced externally, this will extend to due-diligence Labour provider audits conducted by Huntapac on top of checking existing GLA Status of the provider. It will be checked by Huntapac that worker accommodation is up to standard (where applicable), wages comply with National Living Wage regulations (and ensured that no undue or illegal deductions to pay have occurred) and that working hours comply to all aspects of national legislation and the ETI Base Code (Inclusive of both regular working hours and any overtime accrued).

**B. Freedom of Association & Collective Bargaining**

All Huntapac employees are free to join Trade Unions and Worker Associations and we recognise the right to bargain collectively on all matters related to employment.

We encourage the development of work committees and have established a Colleague Voice Committee (CVC) in order to develop good open two-way communication between management and workers.

**C. Forced Labour**

Huntapac Produce Ltd does not utilise or promote forced labour of any kind and is committed to driving out acts of modern day slavery from within its own business and that from within its supply chains. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation to ensure employment is freely chosen and labour is not sourced as a result of any form of trafficking. Any reports of suspected Modern Day Slavery will be fully investigated and reported to the GLAA, regardless of outcome.

**D. Child Labour**

Huntapac Produce Ltd does not utilise or promote child labour and the Company is fully committed to the principles of protecting children from child labour exploitation. This is a commitment the Company seeks to apply throughout the supply chain.

**E. Discrimination, Sexual Harassment and Other Forms of Harassment and/or Bullying**

All staff are entitled to work in an environment which respects their personal dignity and which is free from harassment, bullying or any other type of intimidation. Harassment, whether on the grounds of sex, race, colour, nationality or ethnic origin, religion or belief, or age, disability, sexual orientation, gender reassignment, being in an inferior position in terms of power or hierarchy (leading to bullying), willingness to challenge harassment (leading to victimisation) or otherwise will not be tolerated by the Company.

There will be no discrimination towards any sufferers of illnesses including TB, HIV and Hepatitis although some temporary operational restrictions may be placed on persons of illnesses with symptoms of vomiting and diarrhoea and known instances of food-borne illness in line with FSA *Fitness to work* guidance.

**F. Employee Benefits**

The Company recognises the value of its employees and has identified and assessed their long term retention as key to the short and long term value of the Company. To this end, the Company aims to attract and retain skilled employees and enhance the life/work balance of each individual. The Company facilities its full time staff a range of benefits, including an enhanced holiday scheme for length of service, staff events and free root vegetables. Also available to employees are personal development and training programmes designed to enhance the employee’s skill base.

**G. Grievances**

The Group has adopted a grievance procedure to provide employees who consider that they have a problem or compliant about their work with a mechanism for resolving the issue fairly and speedily. The grievance procedure encompasses the statutory grievance procedure.

**H. Gender Equality**

Huntapac is committed to increasing the number of Women in Leadership roles. In line with Tesco, Huntapac aims to have 30% of leadership roles filled by women.

**5. Workplace Health & Safety**

**A. Health & Safety Policy**

Huntapac Produce Ltd aims to provide each employee with a safe place to work. Relevant information on occupational health and safety is provided in the Safe Systems of Work, published by the Health & Safety Manager.

Huntapac Produce Limited have a duty to protect employees, contractors and visitors to any of their sites. *The Health and Safety at Work etc Act* 1974 (and all of its relevant sections), is the legislation framework the company works to.

**B. H&S Records**

The company records all accidents and/or near misses and investigates these to determine if preventative action is required to prevent further accidents.

**6. Environmental Policy**

The company understands that its activities affect the environment and the communities in which we operate. We believe that we have a responsibility to identify and manage these impacts as effectively as possible. We are committed to continually improving our environmental performance and moving towards best practices in corporate sustainability, and review our Environmental Policy annually, in line with developing technologies and customer expectations. More information can be found in our Environmental Policy.