

	<b>Ethical policies and due diligence</b>	DATE	21/06/21
		VERSION	1
		OWNER	CHIGGS

*This Statement has been published to confirm Mudwalls policies to prevent Bribery and Corruption, Modern Slavery and Human Trafficking and to ensure ethical practices in its business and supply chain.*

## OVERVIEW

Mudwalls is involved in the production, sourcing, packing and distribution of fresh produce and fine foods for retailers and consumers. We do not currently import directly from source; we buy and distribute products already in the country from highly accredited suppliers. We can trace all UK grown product right from source to the end consumer by operating a simple supply chain model with minimal number of parties involved.

Mudwalls is part of Seafresh Group and share several policies, including but not limited to **anti-bribery and corruption** and **Human Rights**. Additionally, Mudwalls adopt policies and procedures adapted to the specificities of our activities and supply chain, such as **Responsible Recruitment** and **Fair Employment conditions**.

## 1.0 Modern Slavery and Human Trafficking

### DEFINITION

Slavery refers to any form of forced or compulsory labour or servitude. Trafficking refers to the transportation or facilitation of transport for any persons for the use of exploitation. Child Labour is defined as depriving a young person of their childhood, their potential and their dignity and impacts on their physical and mental development.

### COMMITMENT TO ETHICAL LABOUR PRACTICES

Mudwalls is committed to identifying and addressing any form of slavery or trafficking of workers and does not accept child labour or any form of unlawful or unfair practices. We ensure our Recruitment process prohibits any form of slavery or human trafficking by ensuring that relevant right to work checks are carried out and that offers of employment comply with legislation on fair pay and working conditions as well as compliance with the working time directive. All employees and workers have the same rights and are treated equally. Mudwalls does not discriminate against someone based on any personal characteristics as outlined in the Equality Act 2010.

### SUPPLY CHAIN

Mudwalls commits to comply with national regulations and principles of the Ethical Trading Initiative Base Code, and we expect the same from our suppliers. We provide our customers with transparent information about our management practices. To mitigate risk within our supply chain, we build strong relationships with suppliers and ensure they meet the requirements under the recognised accreditations: SEDEX (Supplier Ethical Data Exchange) SAQ and SMETA (SEDEX Members Ethical Trade Audit), BRCGS (Brand Reputation Compliance Global standards), RTA (Red Tractor Assurance), SALSA (Safe and Local Supplier Approval), LEAF (Linking Environment and Farming), GG (Global Gap). Mudwalls have a thorough supplier approval procedure which includes risk assessment for all suppliers. Based on the risk, we will determine the frequency of audits completed.

## 2.0 Code of Conduct

### VALUES

Mudwalls is committed to conducting business with integrity, therefore we have adopted the 4 core values of our Group: *Teamwork, Quality, Honesty and Passion*. Everyone on site plays an active role in our success and our commitment to our customers. Our experience in the food industry allows us to understand the needs of our customers and suppliers and build relationships based on Trust. We closely manage every stage of the supply chain to ensure our practices are ethical and responsible and of the highest standard. We respect the communities and environments we work in and are open and transparent in our business dealings. We care about the product we deliver, the service we provide and the industry we work in. Our Mission is to be recognised as a supplier of quality fresh produce and fine foods built on a foundation of trusted provenance, fairness to our supply chain and offering value to customers in a way that is honest, straightforward, and ethical.

## **WORKING ENVIRONMENT**

Mudwalls ensures it's employees working environment that is fit for purpose and maintains high standards of health and safety and hygiene. We ensure all workers have appropriate rest facilities and break areas. Employees are free to leave by giving contractual notice and are protected against any unfair working practices. Training is given where needed or requested and performance is fairly measured through benchmarking to avoid discrimination.

## **BEHAVIOUR**

Our **Code of Conduct** along with our Group Policies prohibit Bullying and Harassment or intimidation. Anyone working for or on behalf of Mudwalls must always maintain the highest standards of conduct, this includes acting in a professional manner and treating others with respect. We encourage anyone to speak up if they see any evidence of breaches in company policies or poor ethical practices. Details will be taken in confidence by HR and anonymity given in appropriate circumstances. Mudwalls supports employees, workers, stakeholders, and visitors to report any ethical concerns or potential breaches in Company Policy without fear of retaliation.

## **3.0 Bribery and Fraud Policy**

### **PRINCIPLES**

Mudwalls share the core values and principles of the Group and recognise our responsibility to uphold responsible and fair business practices. We are committed to promoting and maintaining the highest level of ethical standards and maintaining lawful business practices. The Company therefore share a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all its business dealings and relationships and implementing and enforcing effective systems to counter bribery. A bribe is an inducement or reward offered, promised, or provided to gain commercial, contractual, regulatory, or personal advantage. Accepting or offering a bribe is considered an offence in the UK In line with the Bribery Act 2010

### **RESPONSIBILITIES**

Anyone working for or on behalf of the Company must comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business. They must act honestly, responsibly and with integrity and transparency as well as safe-guard and uphold the Company's core values by operating in an ethical, professional, and lawful manner always. Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside, or accounts created for the purposes of facilitating the payment or receipt of a bribe.

### **EXCEPTIONS**

The Company recognises that industry practices vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy is expected of all employees and associated persons at all times. If in doubt as to what might amount to bribery or what might constitute a breach of the Policy, refer the matter to Human Resources, Head of Legal or a Company Director. Further guidance is available via the Group Policy.

## **DISCLOSURE**

Policies and Procedures are subject to change in line with changes in Legislation and Company requirements. Group policies can be found via the Seafresh Group Website <http://www.seafresh-group.com>. Company values and code of conduct are communicated in our Seafresh Group handbook "How we do the right thing – A guide for employees". Policies are issued to employees and workers as part of the onboarding process and communicated regularly. Mudwalls are committed to ensuring we follow statutory requirements as a minimum and that are practices are fair as well as legally and ethically compliant.

July 2021

**George Beach**  
**Managing Director**