



**MARSTON'S**

# Food Supplier Charter

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# INTRODUCTION

## Marston's at a Glance

Marston's is a leading UK pub operator, with a culture that places guests at the heart of everything we do. Our vision is 'Pubs to be proud of' with a purpose 'to bring people together, to create happy, memorable, meaningful experiences', embodying our DNA of being a pub operator at our core, whilst focusing on consistently delivering high levels of guest satisfaction and standards through our great pub teams. Marston's has a diverse estate of over 1,400 pubs which allows us to offer something for every guest, as well as contributing to each of the communities where we operate.

Pubs are where our guests go to socialise, celebrate, share an experience, or simply enjoy a drink or bite to eat, with our friends, our family, or our colleagues. They are seen as an affordable treat and our high-quality pubs are at the heart of many local communities, offering a warm welcome. A place to enjoy good company.

Marston's is a people-powered business, and our behaviours and strategic objectives are core to how we achieve our purpose:

**Pubs to be proud of**

 <p><b>WE ARE GUEST OBSESSED</b></p> <p>We always put our guests first, aiming to delight them every time they're in our pubs.</p>	 <p><b>WE RAISE THE BAR</b></p> <p>We're committed to each other, the business and being the best version of ourselves.</p>	 <p><b>WE WILL GROW</b></p> <p>We challenge ourselves, and each other, to ensure we're always improving and moving forward.</p>
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Guests visiting our pubs are looking for a great experience which is formed from the foundation of strong standards. Consistent delivery of our key drivers, food quality and speed of service, are critical to Marston's. Without delivering on these, a great experience simply cannot be built.

When these key drivers are delivered to our teams, we see the reward for making our guests feel welcome, relaxed and as though they are in a home from home. As our supply base, you and your products are critical to us delivering on these key drivers and making Marston's 'guest obsessed'.

Marston's has built a proud reputation for providing quality products at competitive prices to our guests. We strive to build a loyal, innovative and trusted supply base through building partnerships with suppliers, who share our values and maintain high standards and ethical business practices.

The Marston's Food Supplier Charter ("Charter") forms part of the trading terms and the contract between Marston's and our suppliers. This document details the sourcing policies, prerequisite standards, conditions of supply and product requirements that all suppliers to Marston's and their products must comply with at all times. The Charter is relevant to all potential suppliers to Marston's, be they manufacturers, wholesalers, importers, traders, or agents. It applies to finished products and the ingredients used within each of those products.

Companies are increasingly being scrutinised by consumers and regulation on both the environmental and human rights impacting their sourcing and Marston's are no different in wanting to ensure we meet those expectations and legal requirements.

Marston's Equality, Diversity & Inclusion Policy extends to our suppliers as well with supplier diversity ensuring inclusive procurement and an inclusive work environment. Our policy reinforces our commitment to equality, diversity, and inclusion, and to having a truly representative workforce where every member of our team, every guest, and every supplier feels respected, valued, and able to be their best.

Marston's use an independent audit provider to complete risk-based audits on our supply base so that we can ensure the products we serve to our guests are safe, legal and comply with the standards covered in this Charter.

All details from all our food suppliers must be updated annually, or as required if there is a change in the information held on the product information database. This may be an approved change in recipe or raw material, but it also includes any personnel changes and contact details. Product information is captured on Smart Supplier.

# PROCESS OF ENGAGEMENT & SUPPLY

## Initial Engagement

Before any supplier can supply to Marston's, they must be approved by our Technical Team. On initial discussion with Marston's, a new supplier will be asked to confirm they will comply with our Supplier Charter and conditions of supply. Suppliers will also be asked to provide a copy of their current BRC, or equivalent certificate and report. If the supplier is an agent or broker, the same information must be shared for the point of product manufacture.

## Innovation

It is expected that suppliers will contribute to an active innovation programme providing a pipeline for future growth. We encourage working confidentially to the mutual benefit of Marston's and the contributing supplier to ensure that at all times Intellectual Property is protected.

For the avoidance of doubt, unique ideas or innovation generated as a result of discussions between Marston's and the Supplier remains the property of Marston's. We would expect exclusivity agreements for an agreed period of time on ideas or innovations that a supplier brings to Marston's before they can exploit it elsewhere. This is mutually beneficial to us for growing our businesses together.

## New Product Development

Suppliers are encouraged to bring new innovative products to Marston's attention, through discussion with NPD Manager or Senior Food Team members as soon as they are available. Each format has one core menu a year, with specials and red-letter days launched to support.

The initial briefing stage will be done manually and outside of Smart Supplier (Marston's will provide a document for suppliers to fill out all relevant information including Quality Attribute Sheet (QAS) fields). If successful, a New Product Development (NPD) specification request will then be sent by us through Smart Supplier - this will enable the product to be progressed further through the process, though is not a guaranteed listing at this stage. If any samples are required, they will be requested directly from the NPD Manager or Senior Food Team members. Once a product is approved in the NPD phase, it will progress through to full technical approval ready for launch. The NPD brief will detail conditions that we require products to comply with, non-compliance may result in products not being shortlisted.

Marston's requires all suppliers to fully consider all the ingredients in NPD proposals. Any non-essential ingredients should be removed before proposals are submitted. To maximize the freedom of choice given to its guests, Marston's does not want to declare the presence of an allergen or additive when they do not add anything of benefit to the final product. Suppliers must also ensure that proposals do not contain any of the ingredients this Charter does not permit i.e. MSG, Southampton Six Colours, hydrogenated vegetable oils. Full details can be found in the Sourcing Policies section (page 11).

All brief submissions are required to meet PHE sugar, calorie, and salt targets, providing it will not be detrimental to the quality of the final product, e.g., a naturally high sugar product, such as chocolate brownie.

Any product names presented to Marston's should be compliant with all food labelling regulations from first product presentation. See also Trademarking of Product Brands in the Product Specification section.

## Smart Supplier

Marston's use Smart Supplier to manage both supplier and product information. It connects suppliers and Marston's business users to manage the supplier product lifecycle. The platform supports the business process from the NPD stage and flows through all the way to where a product is fully approved for listing. Marston's will deem the appropriate stage a product enters the process, but all products which require panelling will need to go through the NPD process. The number of attributes that need to be provided at NPD stage are limited and full details are provided within the Policies section of Smart Supplier.

Smart Supplier has been independently reviewed and is primary authority assured providing a high degree of due diligence in relation to the allergen information.

All suppliers shall be created on Smart Supplier by Food Alert. Once connected to the Marston's account the supplier shall have a 'pending' supplier approval status.

Once the supplier is set up, they will have access to the system 'User Guide' in the Policy Document. The supplier shall be responsible for completing all Company details, certifications, sites, users, the SAQ (Appendix 1) and accept Marston's Policy Documents (this Food Supplier Charter).

The supplier will then be responsible for adding any additional users to the system and keeping it updated with the latest information. This is key if Marston's are to stay connected with the supplier and they are to benefit from product development briefs.

Once the new supplier has been connected to the Marston's account the risk rating shall be visible. The risk rating shall update once the supplier has completed the Certifications, SAQ and has accepted this Food Supplier Charter. In addition, the risk rating is impacted on by areas such as third-party accreditation, specification accuracy, audit and complaints.

Marston's Technical Team will review the information supplied and either approve or reject the supplier. A discretionary modifier can be applied to the risk rating of a supplier where they fall short of Marston's requirements but may be working towards achieving them.

## Food Safety Policy

Our policy requires products to be cooked or reheated to a core temperature of 75°C. There are exceptions for some products such as carvery meats where a slow and low cooking method is used. It is also our policy to date code products with day of opening (prepped and cooked - plus 48 hours, defrost plus 3 days), or where applicable, manufacturers label. This can be discussed further with the Senior Food Team members regarding specific products.

## Product Listing

When a supplier receives a new line listing, a pre-production trial must be completed. Only once a product has been signed off by a Marston's Senior Food team member (supported by Technical) may full production begin. At the pre-production a QAS should be completed, referencing information given on the sample submission documentation. This document is then the agreement between Marston's and the supplier on the quality parameters of the product throughout supply. Marston's Technical team carries out regular quality sampling of its products against these QAS, to ensure live products are remaining true to what was originally agreed. Any non-compliance will be communicated to the supplier. Any draft QAS details on Smart Supplier must be updated by the supplier after the pre-production trial.

## Product Quality - Pride in Plate

Value of experience is a key reason when selecting where to dine and drink out of home. We know that quality of our food and service speed directly correlate to overall satisfaction amongst our guests and their desire to repeat a return to our pubs. Pride in Plate is the overarching programme acting to raise performance in these areas - thus reducing complaints, refunds and increasing frequency of visits.

There are three parts to Pride in Plate:



Our primary aim is to ensure we have confidence in the products going into our kitchens, alleviating pub complaints and enabling our teams to only focus on amazing execution. This is achieved by working in partnership with suppliers that meet the high standards set out in this Supplier Charter, through developing best in class products which are then monitored through our auditing processes.

As our supply base, you are critical to the success of Pride in Plate. Further information about our format channels and product development plans will come from the Food team through NPD briefs.

# NEW SUPPLIER APPROVAL

## New Supplier Approval

Before any supplier can supply to Marston's, they must be approved by our Technical Team which will involve completion of the SAQ on Smart Supplier and agreement to work to the standards in this document. Arrangements will be made to complete an audit of any new manufacturing site at which the product is going to be manufactured.

No supplier agreement, contract, document, letter or any other attachment to an e-mail should be taken as a legally binding commitment by Marston's, unless it has been approved in writing by Marston's technical and/or Legal team. Suppliers must keep all supply agreements and arrangements with Marston's confidential, including but not limited to, pricing and terms. Such confidential information will not be released to any third party without the prior written consent of Marston's.

## Pre-requisite Standards for Food Suppliers

The minimum requirements for supply are detailed below:

- Certification to Global Food Safety Initiative (GFSI) Standard e.g. BRC Grade A / IFS Higher / ISO 22002-1:2009 – all of which include the requirement for a HACCP (Hazard Analysis Critical Control Point) based food safety system.
- Where certification does not achieve a BRC Grade A, Marston's Technical Team should be notified so that practical steps can be taken to mitigate risk to the business and in some cases may mean supply is not possible.
- Importers and traders – suppliers acting on behalf of manufacturers not under their direct control must ensure that the production sites conform to GFSI Standard and provide supporting evidence. Again, BRC Grade A or higher is expected of the manufacturers supplying the importers and traders and Marston's reserve the right to audit manufacturing sites used by importers and traders.
- Suppliers must notify Marston's of any change in certification grade below the Grade A standard.
- Suppliers must give Marston's advance notice of any change in production address/facility. No less than 8 weeks' notice should be provided to enable panelling of product made at the new manufacturing site, any stock build to be undertaken and also for audit to be completed. Marston's will share this information with LR.
- In exceptional circumstances by prior agreement, certification to Safe & Local Suppliers Association (SALSA) for small, regional suppliers is acceptable. This also has a HACCP requirement.
- Conformance to the Marston's Supplier Charter i.e. this document which will be acknowledged on Smart Supplier.
- We expect our suppliers to follow the Corporate Code of Ethics published by CIPS (Chartered Institute of Procurement & Supply). The code sets out the values, business culture and practices which all organisations can adopt. The code requires a commitment to the eradication of unethical business practices, including bribery, fraud, corruption, money laundering and human rights abuses, such as modern slavery and child labour.
- Full compliance with all relevant food legislation e.g. food additives, novel food, food labelling, food flavours and colours.
- An annual schedule of DNA testing for horsemeat in all meat and minced meat products and independent analytical results confirming its absence. Marston's reserves the right to request DNA tests of protein from other livestock.
- Where applicable, animal welfare policies and evidence of compliance throughout the supplier's supply chain.
- Suppliers must be able to provide evidence supporting menu claims such as provenance, sustainability, Fairtrade, vegetarian, vegan, nutrition, health and allergen data.
- Suppliers agree to have their production sites audited for food safety before being approved to supply Marston's. We reserve the right to carry out periodic, unannounced visits at key food suppliers for safety and ethical checks.
- Meet agreed specifications and Quality Attribute Sheet (QAS) data at all times. If a supplier becomes aware they can't then they should immediately notify Marston's prior to any changes being made.

- Marston's may share data with suppliers from time to time. Suppliers are expected to treat all data as sensitive unless explicitly advised otherwise. Suppliers must not handle or store our employee or guest data without our approval. Every effort must be made by our suppliers to protect all data and information they handle, control or maintain. Suppliers must take steps to protect the confidentiality, integrity and availability of the data wherever it may be. Suppliers must advise Marston's immediately should a suspected data breach take place.

# SUPPLIER AUDITS

## Food Safety Audits – What to Expect

Our auditing is carried out by a third-party provider to assess supply chain assurance and complete risk-based audits and any corrective action process on our supply base so that we can ensure the products we serve our guests are safe, legal and comply with the standards covered in this Charter.

### Prior to the Audit

- Each supplier will be contacted by Food Alert Planning Team regarding audit completion. An email will be sent to each supplier's nominated technical and primary commercial contacts within the supplying site advising of potential dates to complete the audit. If the dates are not suitable, you will be able to suggest alternative dates, as long as these are reasonable and do not take you over the expiry date for approval. Once a date is agreed by both parties, a Food Alert auditor will be allocated and they may contact you directly to confirm their agenda.
- Once a date has been agreed, a confirmation email will also be sent detailing the date and start time of the audit, who the auditor will be and you will be provided with a copy of the audit template, standard, and a blank corrective action plan.
- Prior to the audit you will be asked to supply pre-audit documentation and confirm that the Food Alert have the correct address details for the site to be audited.
- In addition, suppliers will be asked to sign a contract for invoicing and payment and to ensure Food Alert have the correct invoicing information and suppliers are aware of payment terms. This will be sent via DocuSign.

### The Audit

The audit, which may be physical or remote, will cover the following:

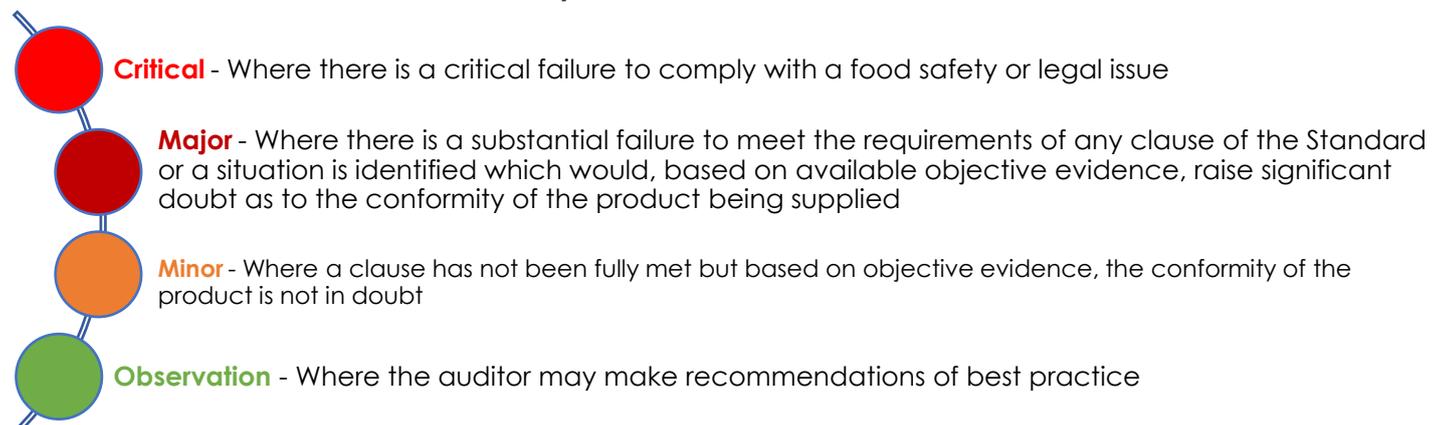
- Opening meeting
- Site tour looking at all production facilities, storage areas, staff area etc.
- Review of the paperwork systems.
- Traceability.
- Closing meeting and review/discussion of non-conformances found.

### Non-conformities and Corrective Action

Non-conformances will be discussed during the audit, and the auditor will summarise these at the closing meeting. A copy of the corrective action plan should be printed and signed by both parties before the auditor leaves the premises.

The level of non-conformity assigned by the auditor against a requirement of the Standard is an objective judgement with respect to severity and risk and is based on evidence collected and observations made during the assessment.

### There are three levels of non-conformity:



## Audit Report

The audit report will be available to view on the online system 'Audit65'. Following the audit, you will be provided with log in details for Audit65 to enable you to view the audit report and any non-conformances that may have been raised.

## Submitting Evidence of Corrective Action

If non-compliances have been found, you must submit evidence to Food Alert via the online system 'Audit65' to demonstrate you are complying with the standards. The assessor will explain what format will be acceptable, for example a copy of documents, invoices for work completed or before and after photographs. In some cases, Food Alert may be required to carry out a revisit to check on specific issues (this will be agreed with Marston's prior).

If satisfactory evidence has not been received within 28 days of the audit date this will be reported back to Marston's. If there are a significant number of non-conformances or the nature of the non-conformance requires more than 28 days to rectify, please inform Food Alert for an extension.

## Audit Costs

The audit will be completed by competent auditors, appropriate for your category and typically take one day. The cost of this audit will be invoiced by Marston's.

In summary costs cover:

- One day physical or remote audit - base cost plus VAT. Expenses will be charged separately.
- Desktop audits may be used for low risk and branded suppliers and are chargeable at a base cost per audit plus VAT.
- Expenses are classed as 'reasonable' so travel would be by car at 50p per mile, standard rail travel or flights in economy class. Any hotel accommodation required will be booked in a hotel such as Marston's Inns, Premier Inn or Travelodge. Subsistence allowance is also included for a one course meal with a drink for overnight stays and breakfast the following morning.

## Key Timelines for the Audit Process

Food Alert will send a request to the supplier for Pre-Audit Information – Each site will be given 5 working days to provide this information back to Food Alert. If this is not provided within 5 days this will be chased up and then escalated to Marston's.

After the audit is carried out a record of any non-conformances is left with the site on the day of audit.

Any corrective actions must be submitted back to Food Alert within 28 days – further evidence may be requested once corrective actions have been reviewed.

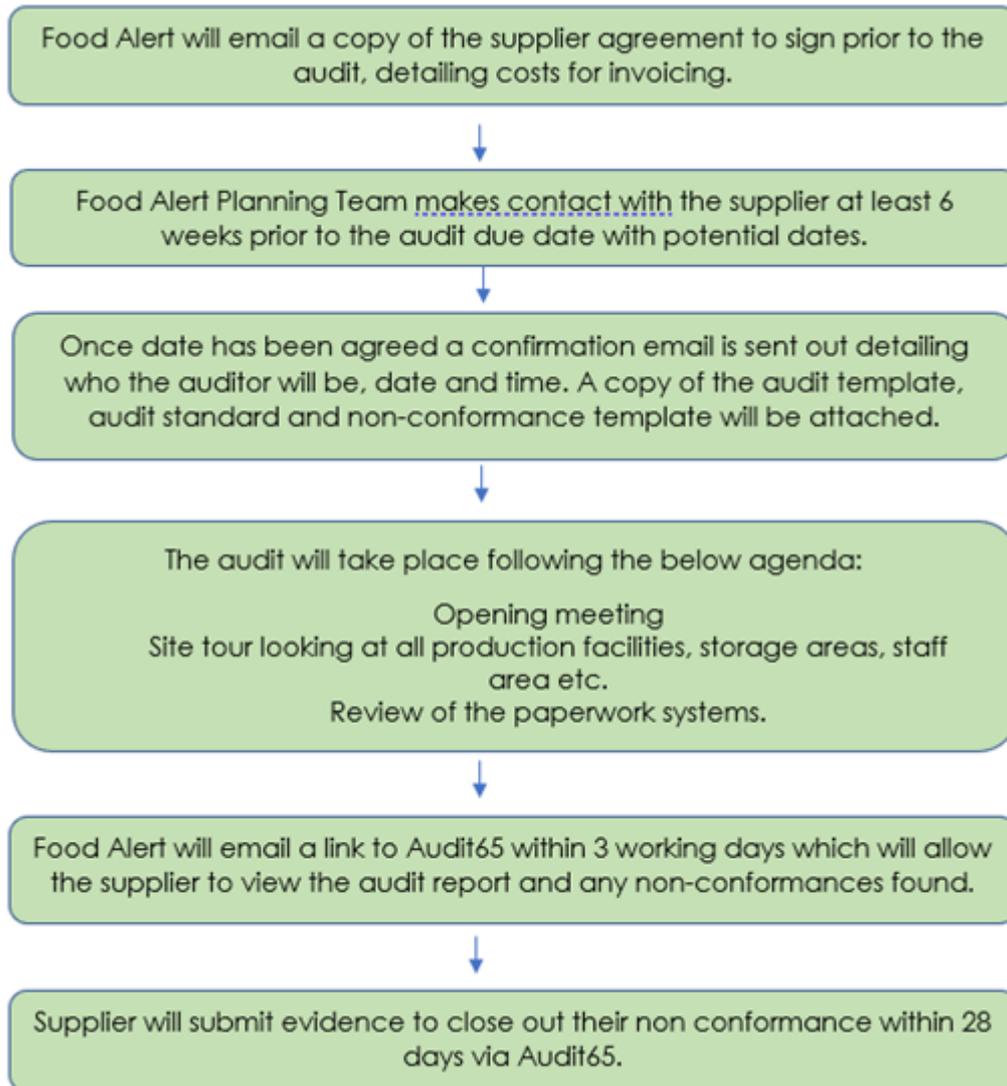
After the audit process has been completed, each supplier's risk rating will be reviewed and this will determine audit frequency and the next audit will be scheduled in.

## Business Continuity

Marston's suppliers may be required to provide evidence of their continual supply chain risk management and commitment to the continuation of supply. This can be provided in the form of business continuity plans, disaster recovery plans or other available evidence.

In some instances, our business-critical suppliers, will be subject to a Business Continuity review carried out by internal auditors and at no cost to the supplier.

## Audit Process Flow



# DOING MORE TO BE PROUD OF

We are passionate about delivering our Environmental, Social and Governance (ESG) and sustainability initiative: 'Doing more to be proud of'. We believe we can make meaningful contributions to all our stakeholders, from cutting carbon emissions and tackling food waste, to caring for our people and encouraging them to grow, and supporting the communities in which we operate.

At Marston's we have invested in sustainable and responsible business practices for many years, including being amongst the first in our sector to implement environmental initiatives, such as zero waste to landfill and the installation of electric car chargers across our pub estate.

Lead by our General Counsel & Company Secretary, with support from Marston's Board of Directors, our 'Doing More to be Proud of' initiative is comprised of steering groups within our business with expertise and who are responsible for driving progress and targets as part of 'the way we do things round here'. Split into four pillars which are the cornerstone of our strategy and focus: Planet, People, Product and Policy.

## **Planet**

Headed by our Director of Property and operated by our Energy Manager. This includes continual development and operation of our plan for Net Zero, and all other aspects of environmental initiatives including waste reduction, our EV infrastructure, recycling, water conservation. More information can be found in [our TCFD report](#).

## **People**

Headed by our Director of Learning & Development. The social impact of our business includes the impact we have within the communities which pubs are at the heart. It also incorporates the wide range of well-being concerns, such as health, employment, fairness, and equality, diversity and inclusion.

## **Product**

Headed by our Head of Technical services, this focuses on the food and drink for our guests, from the reduction in food waste to the healthier choices that our guests make, the importance of allergens and sourcing of our food and drink.

## **Policies**

Headed by our Director of Corporate Risk, this aspect includes our external reporting on ESG matters, ESG ratings, supply chain monitoring, compliance and risk management.

More information can be found on our website [www.marstonspubs.co.uk](http://www.marstonspubs.co.uk)

# SOURCING POLICIES

## Full Specification

The full specification requires additional Smart Supplier fields to be completed over and above those in the NPD phase. The full list of attributes is provided as part of Smart Supplier training, but summarised they include:

- Ingredient Specification – to include country of origin.
- Full allergen and dietary information.
- Quality Attribute Sheet – see quality section for more details.
- Analytics – Micro standards, chemical standards and physical standards.
- Packaging details – to include primary, secondary and tertiary layers.
- Depending on information included in the specification, additional mandatory attachments may also be required e.g. RSPO certification.

## Business Rules & Validation

In Smart Supplier there are business rules that need to be met by the supplier so that we are able to validate our policies and these must be completed before the supplier is able to publish the specification:

- Marston's policy documents must be accepted
- Caged eggs must be 'no'
- Southampton Six colours must be 'no'
- GMO must be 'no'
- Glutamates (Includes MSG) must be 'no'
- Mechanically Recovered Meat must be 'no'
- Palm Oil must be RSPO certified
- Irradiated Food must be 'no'
- HVO must be 'no'
- Acrylamide within benchmark levels must be 'yes'
- Suppliers of all fish products, and complete dishes which contain fish, must be able to provide sustainability specification details.

All the above rules are discussed in more detail throughout this Charter.

The Technical team will look to approve or reject any validation exclusion, these include areas such as salt, sugar and calorie targets; claims, allergens, and nutritional information.

## QUID

A Quantitative Ingredient Declaration (QUID) must be completed if the ingredient:

- Is in the name of the food (for example, the 'blackberry' and 'apple' in a blackberry and apple pie);
- Is usually associated with that name by the consumer;
- Is emphasised by words, pictures, or graphics on the label (PPDS only).
- Characterises a food and distinguishes it from products with a similar name or appearance. For example, lasagne made with pork must show the QUID for the pork because it characterises the product and distinguishes it from a lasagne (usually made with beef).

You do not need to give a QUID if the ingredients: have only been used in small quantities as flavouring; are used in varying proportions and can be labelled as fruit, vegetables, mushrooms, herbs or spices (such as in a vegetable soup); already have a quantity shown on the label as a 'drained net weight'.

## Nutritional Information

- Any nutritional data entered must be analytical, not theoretical, unless approved by Marston's.
- Energy values will be auto calculated from the sum of protein, carbohydrate, alcohol and fat figures on Smart Supplier.
- Suppliers must ensure where products contain bone e.g. ribs, wings, chops that the nutritional information provided excludes the weight of the bone.
- McCance and Widdowson's (The Composition of Foods Integrated Dataset) values are acceptable for unprocessed single ingredient products such as cereals, dairy products, eggs, meat, fish, fruit and vegetables.

## Allergen Information

- As per the EU Provision of Food Information to Consumers' Regulation (No.1169/2011) all food businesses need to provide accurate information about allergenic ingredients used in food.
- Marston's require its suppliers to provide such information on all products.
- Questions on intolerance information must only ever be answered "Contains" or 'Does not Contain' on Smart Supplier. The answers should reflect the direct ingredients used in the recipe of the product, not what could be present as a result of cross contamination.
- If a supplier selects 'May Contain' as an option they must be able to supply their risk assessment and be willing to discuss this with the Marston's Technical Manager so that a decision can be made on whether the allergen is reported as a yes, no or may on reports.
- Non-Gluten Containing Ingredients (NGCI) v Gluten Free (GF) - Marston's does not make GF claims on any dishes. However, Marston's do have dedicated NGCI menus for all formats. Suppliers are encouraged to remove gluten where possible and where there is no material effect on the final product.
- Smart Supplier will also require confirmation of the presence of other dietary ingredients that can cause allergic reactions to our guests. These are garlic, onion, mushroom, tomato, peppers/capsicum and kiwi fruit.
- There should be no changes in allergens or nutritional information from the first showing in NPD stages to when the product goes live without prior discussion with Marston's NPD Manager.

## Shelf Life and Temperature

All food products delivered to us must be within their minimum durability dates and as per the agreed minimum shelf life as defined within the product specification. (Section on Product Supply provides further details). Suppliers must be able to provide shelf -life validation and thermal validation of HACCP cook procedures when requested. Products received at depot should be at the following temperatures:

- Chilled Goods: 1-5°C.
- With respect to raw meats the recognised best practice is:
  - Poultry and raw meat preparations: 4°C
  - Offal: 3°C
  - Minced raw meat: 2°C
- Frozen Goods: -18°C or below.

## Additives including Flavour Enhancers

New products are not allowed to use artificial flavour enhancers e.g. mono sodium glutamate. No food products on our menus should contain the Southampton six colours that are linked to hyperactivity in children. Sunset Yellow (E110), Quinoline Yellow (E104), Carmosine (E122), Allura Red (E129), Tartrazine (E102), Ponceau 4R (E124).

## Animal Testing

Marston's does not allow any of its products, or ingredients of its products, to be tested on animals. It is the supplier's responsibility to ensure that all raw ingredients used in the production of any Marston's product are not tested on animals, and suppliers must be able to verify this via their own supply chain management processes, if required.

## Acrylamide

Acrylamide is a substance that is produced naturally in food when cooking at high temperatures and has been linked to causing cancer in animals.

Suppliers' products that are susceptible to acrylamide formation must be able to demonstrate good manufacturing practice to monitor and reduce levels based on risk, and this should be included within the production site's HACCP plan. Controls in place should include raw material selection, recipe design, process method (cooking times and temperature) and finished product standards. Suppliers must be able to prove they have a suitable monitoring system in place and unless previously communicated to and agreed with Marston's, products as delivered should never exceed the benchmark levels of acrylamide that are set in the EU legislation.

The legislation applies to the foods listed below and shows the benchmark level of acrylamide in ug/kg:

- French fries, other cut (deep-fried) products and sliced potato crisps from fresh potatoes (500),
- potato crisps, snacks, crackers, other potato dough products dough (750)
- bread (50-100),
- breakfast cereals (excluding porridge) (150-300),
- fine bakery wares: cookies, biscuits, rusks, cereal bars, scones, cornets, wafers, crumpets and gingerbread, as well as crackers, crisp breads and bread substitutes (300-800),
- coffee: (i) roast coffee (400); (ii) instant (soluble) coffee (850),
- coffee substitutes,
- baby food and processed cereal-based food intended for infants and young children (40).

## Trademarking of Product Brands

Marston's expects suppliers to confirm where a brand name, trademark or registered term can be declared and be able to provide sufficient evidence on Smart Supplier to substantiate such claims, prior to offering the product. The supplier is responsible for ensuring Marston's hold up to date information on how brands are to be represented and that all changes are communicated in a timely manner.

## Standards

Through Smart Supplier all products will need to have chemical, microbiological and physical standards supplied to gain full approval. E.g. microorganisms such as E coli, salmonella, coliforms etc. pH, Brix, acrylamide levels, weight of product, weight per pack. Products such as pies should have weight of pastry case, filling - meat and mushrooms, pastry lid.

More information can be found at:

<https://www.food.gov.uk/business-guidance/hazard-analysis-and-critical-control-point-system-in-meat-plants>

# HEALTHY EATING & LABELLING

## Calorie Reduction

Marston's aims to develop dishes that offer both full flavour and appropriately sized portions, with an appropriate calorie level. Our menus must always offer a range of calorie contents across all sections and we will always consider Public Health England's aim of meals to have 400/600/600 calories for breakfast/lunch/dinner respectively.

Marston's engage with Public Health England on their calorie reduction plan and recognise that on average we are consuming too many calories on a regular basis, increasing our chances of becoming overweight and obese which is a leading cause of poor health and premature death.

The calorie reduction programme challenges the food industry to achieve a 20% reduction in calories by 2024 in product categories that contribute significantly to children's calorie intakes (up to the age of 18 years) and where there is scope for substantial reformulation and/or portion size reduction. This requires work to be undertaken by the eating out of home sector. The products covered by the programme include ready meals, pizzas, meat products, savoury snack products, sauces and dressings, prepared sandwiches, composite salads and other "on the go" foods including meal deals.

Suppliers must select a calorie reduction category for their product, where relevant, on Smart Supplier.

## Salt Reduction

Marston's has a strong history of reducing the salt content in its products in line with the Department of Health's Responsibility Deal. Suppliers must ensure all new lines achieve the relevant Office of Health Improvement and Disparities (OHID) 2024 salt target. It is the supplier's responsibility to ensure all concepts/products presented to Marston's achieve the 2024 salt target. If a category has an average target, that value must be met rather than the maximum level. The salt content of products should be as consumed and not as delivered, and this should be reflected on Smart Supplier.

If a supplier is in any doubt about the category their products fall within, then they should discuss this with Marston's at an early stage of development and thus avoid any un-necessary redevelopment further down the line. Marston's has committed that no new lines will be launched unless they meet these targets.

## Sugar Reduction

Marston's continually strives to meet the demand for healthier options. We support the OHID Sugar Reduction Programme suppliers must select a sugar reduction category for their product, where relevant, on Smart Supplier.

## Sugar Replacers

Wherever possible Marston's ask that suppliers avoid the use of artificial sweeteners, such as aspartame and acesulfame K.

## Trans Fats and Hydrogenated Vegetable Oil

Marston's is proud to declare that all our meals are free from artificial trans fats and hydrogenated vegetable oils. No new products will be launched that contain artificial trans fats and hydrogenated vegetable oils.

## Clear Labelling

Marston's is committed to ensuring that all claims on menus can be substantiated by suppliers and are included in the product specification. Where provenance exists in a product, we would expect these details to be communicated as part of the NPD process and included within Smart Supplier.

It is suppliers' responsibility to ensure any claims made meet the health and nutrition claims legislation and be able to provide any evidence on Smart Supplier to support the claim on request.

# ANIMAL WELFARE & ASSURANCE SCHEMES

## Animal Welfare

Marston's is committed to animal welfare. We expect suppliers to employ high standards of animal welfare both for animals that are reared for meat and dairy products, and for animals used for work and transport. We are further committed to achieving an integrated supply base to allow, wherever possible, whole life traceability. We require suppliers to have RSPCA assurance for products where appropriate, and we require to be made aware of where it is in place.

We specifically endorse the "Five Freedoms" concept:

- Freedom from hunger and thirst.
- Freedom from discomfort.
- Freedom from pain, injury and disease.
- Freedom to express normal behaviour.
- Freedom from fear and distress.

## Meat

As a minimum:

- Meat must be reared, transported for slaughter, be slaughtered, and processed according to relevant legislation. The supply chain will be more credible if each of these processes take place at assured premises, e.g. Red Tractor Assured, Red Tractor and Meat Processing Assured, Quality Meat Scotland.
- Meat entering the chain must be from licensed slaughter premises.
- Carcass and packed meat must be traceable, and the country-of-origin information must be declared in the specification, including details where the animals are born, reared and slaughtered.
- In respect of meat whose slaughter and preparation method is certified as Halal the slaughter provisions must accord with those appropriate codes, and must include humane stunning of the animal prior to slaughter. Marston's do not actively source halal products and have no requirement for suppliers to provide halal certified meat.
- Marston's does not allow the use of any mechanically recovered meat, including Baader, in any products in our menus.

## Pigs

As a minimum:

- Pigs to be reared to the minimum standards required by the UK Animal Welfare Act 2006/2007 or EC 91/630/EEC 1991. Pigs require enough space to turn around without difficulty, stand up, lie down and rest without difficulty and enough space to allow the animals to lie down at the same time (under legislation for fully grown pigs this is 1.64m to 2.25m).
- Housing must be constructed and maintained to provide a safe and secure environment for livestock. Housing must be appropriately and effectively ventilated.
- Piglets must remain with sows for a minimum of 28 days.
- Marston's insist on a safe and ethical work environment for employees on sites.
- Where employees work with, or have responsibility for pigs, they must be competent to work with the pigs in ways which safeguards the animal's welfare. Along with training records staff must be able to demonstrate competence on farm, this must also be regularly reviewed by management.
- Medicines and veterinary treatments must only be used where necessary and in accordance with manufacturers recommendations.
- Antibiotics or steroid growth hormones must not be used to promote growth or be administered prophylactically. The use of antibiotics must be monitored regularly by the sites vet with the aim to reduce the usage, any spikes in antibiotic use must be investigated and any findings acted upon.

## Poultry

Marston's recognise the European Chicken Commitment set for 2026 and the improved animal welfare and food quality standards it promotes:

- Comply with all EU animal welfare laws and regulations, regardless of the country of production.
- Implement a maximum stocking density of 30kg/m<sup>2</sup> or less. Thinning is discouraged and if practiced must be limited to one thin per flock.
- Adopt breeds that demonstrate higher welfare outcomes: either the following breeds, Hubbard Redbro (indoor only), Norfolk Black, JACY57, JA757, 787, 957, or 987, Rambler Ranger, Ranger Classic, and Ranger Gold, or others that meet the criteria of the RSPCA Broiler Breed Welfare Assessment Protocol.
- Meet improved environmental standards including:
  - At least 50 lux of light, including natural light.
  - At least two metres of usable perch space, and two pecking substrates, per 1,000 birds.
  - On air quality, the maximum requirements of Annex 2.3 of the EU broiler directive, regardless of stocking density.
  - No cages or multi-tier systems.
- Adopt controlled atmospheric stunning using inert gas or multi-phase systems, or effective electrical stunning without live inversion.
- Demonstrate compliance with the above standards via third-party auditing and annual public reporting on progress towards this commitment.
- In due course Marston's will require suppliers of all chicken products, and complete dishes which contain chicken, to provide details on adherence to these standards on Smart Supplier.

## Fish

As a minimum:

- All fish and fish products supplied must be from sustainable sources. This includes all products that use fish and fish products whether a natural fish product or a composite dish where fish is just one of the ingredients. This principle applies to farmed fish, wild sea fish and shellfish.
- Suppliers of all fish products, and complete dishes which contain fish, must be able to provide the following information on Smart Supplier:
  - Current sustainability status of the fish used against the Marine Conservation Society Good Fish Guide. Marston's are committed to ensuring that all the fish we use is from a source rated 3 or above on the Good Fish Guide, if the source is rated 4 or 5 then the supplier must be able to illustrate the steps being taken to improve said rating. It is the supplier's responsibility to liaise with the MCS to identify and rate the source of the product intended for supply to Marston's.
  - Our preference is for the MCS Good Fish Guide rating to be provided on Smart Supplier, but alternate accreditations can be supplied if needed: Marine Stewardship Council (MSC), British Aquaculture Policy (BAP) and GlobalGap.
  - Commercial name of the species using the EU regulated species glossary (drop down in Smart Supplier).
  - The capture method.
  - The catch area.
  - Tuna must be caught using the pole and line method.

## Chicken Eggs

Suppliers of fresh chicken eggs must meet appropriate standards for health and safety, traceability, shelf life and animal welfare. All new products to be launched with egg as an ingredient must use cage free eggs. In addition to this, Marston's have committed to redevelop all own brand products where egg is used as an ingredient to be cage free by the end of 2025. We encourage branded suppliers to do likewise. All shell eggs have been cage free since early 2019.

## Health Marks

The identification mark is applied to a product with ingredients of an animal origin to show it has been produced in an establishment approved in accordance with food safety and hygiene regulations, and is typically applied to wrapping, packaging, or labelling. All relevant products supplied to Marston's must display this identification on the outer packaging and details must be supplied on Smart Supplier.

## Antibiotics

There is global recognition that there is an increasing need for a more responsible use of medicines and antimicrobials/antibiotics. The spectre of Antimicrobial Resistance (AMR) increases due to over and inappropriate use in food producing animals and is a likely contributory factor in the increase in resistance to certain antibiotics in human medicine.

If antibiotics are used at any point in the food chain of an ingredient, then the Marston's supplier must have an antibiotic policy in place and be able to provide a copy as part of the SAQ. This includes dairy ingredients in finished products such as desserts, meal centres and sauces.

There are many actions that have been taken and activities in progress to deal with the problem of AMR and a number of these have a bearing on how risk can be assessed by product category and geography. These include:

### **Global action plans**

- In 2005, the World Health Organisation (WHO) agreed that antibiotics should be classified into 3 categories- a) Critically Important Antibiotics (CIAs), b) Highly important (HIAs) and c) Important (IAs). The highest priority CIAs include the fluoroquinolones, 3rd and 4th generation cephalosporins, macrolides and glycopeptides. Fluoroquinolones and last generation cephalosporins are used to treat life threatening Salmonella and E. coli in humans. Both are used in food producing animals and resistant strains are now being identified.
- A global action plan coordinated by WHO and FAO promotes improved awareness and understanding of AMR; more surveillance and research; the need to decrease the incidence of infection in the first place; to optimise antibiotic use and to develop alternative strategies e.g., vaccines.

### **National action plans**

- The UK has various initiatives coordinated through vets, industry (RUMA: Responsible Use of Medicines Alliance) and academic research.

### **EU action plans**

- All growth promoters were banned in 2006.
- 2022 saw the restriction of veterinary antimicrobials across the EU. These new rules ban the routine use of antibiotics and restrict preventative use to exceptional treatments of individual animals.

### **Industry action plans**

- RUMA in the UK promotes the 4 key control principles of a) reviewing biosecurity (e.g. introduction of new animals, screening for disease, equipment disinfection); b) reducing stress (e.g. improved housing, reduce stocking rates); c) good management and hygiene; and d) good nutrition. The RUMA Targets Task Force (TTF) is industry-led and sets sector-specific targets for antibiotic stewardship in UK livestock farming.
- UK poultry sector - voluntary ban on modern cephalosporins, decreased use of fluoroquinolones and restricted use of colistin.
- *Quality Assurance Schemes*
- GlobalGAP in Beef, Lamb and Dairy bans the use of modern cephalosporins and fluoroquinolones. CIAs not permitted in poultry systems unless in high mortality situations and after sensitivity testing.
- Arlagarden (Arla's own QA scheme) - requires the use of selective rather than blanket dry cow therapy for dairy cows. It supports Red Tractor and introduces a further sixteen standards including use of antibiotics and medicines.
- GlobalGAP - prohibits the prophylactic use of antibiotics in pig systems.
- Red Tractor - routine use of fluoroquinolones is not permitted in broiler chicks and modern cephalosporins are not permitted at any time.

Marston's policy is to ensure that antibiotics are only used when prescribed by a vet to prevent discomfort or treat illness or when a vet prescribes them for metaphylactic use and no growth promoters are allowed in any medicine or animal feed. All animal medicines must be authorised for use, used appropriately and records kept for 5 years. It is the supplier's responsibility to check through the tiers of the supply chain to ensure conformance. Suppliers to Marston's must be able to demonstrate on Smart Supplier SAQ:

- That they are aware of the extent of antibiotic use in the products supplied and can indicate whether those used are Prophylactic, Metaphylactic or Therapeutic.
- Have a policy on antibiotic use.
- That they are monitoring the overall use of antibiotics.
- Antibiotic reduction targets are in place and where possible provide historical tracking information.

## Produce

As a minimum:

- We expect our suppliers to meet the relevant legislation and Codes of Practice applicable in their marketplace and generally strive towards best practice particularly in the use of chemicals and pesticides. Suppliers must have certification to a recognised standard that is appropriate to their operation. This can include BRC, GlobalGap, Red Tractor and LEAF Marque, VEGAPLAN and Europe's Common Agricultural Policy (CAP 2023).
- Residue test results from an accredited laboratory must be recorded and documented actions must be retained for a minimum of 2 years. Suppliers must possess and adhere to a list of the current applicable Maximum Residue Levels for the UK market and must have a robust system of traceability from seed to end product in place.
- The above apply to all produce regardless of whether it is fresh, frozen or ambient produce or an ingredient of a composite dish. It applies to manufacturers, importers, traders, agents and producers.
- We endeavour to decrease the risks and impact of pesticides on human health and the environment by encouraging the use of integrated pest management (IPM) and alternate practices, such as non-chemical substitutes to pesticides.
- Where citrus fruits are waxed Marston's encourage the use of plant-based wax.

# BIODIVERSITY, SUSTAINABILITY & ENVIRONMENTAL POLICIES

## Soy

Marston's recognise that soy is one of the worlds important sources of protein and is used as an ingredient within our products. Marston's also recognise soy is used as a component of animal feed used by some of our suppliers. We are committed to ensuring that the soy used in our supply chain is cultivated in a responsible and sustainable manner:

- Our Meat suppliers apply the guidelines for responsible soy adopted by the European Feed Manufacturers Federation (FEFAC) and their recognised deforestation policy sets out clear guidelines for the prevention of both illegal and legal deforestation by 2025.
- We recognise the Round Table on Responsible Soy Association (RTRS) for sourcing responsible soy and encourage our suppliers to work towards these standards.
- We commit to working with our suppliers to ensure that all soy used as an ingredient or compound ingredient in the supply chain is certified sustainable according to a recognised certification scheme.
- We commit that no product used in Marston's containing soy will be confirmed as suitable if the origins are not confirmed as suitable.
- In due course Marston's will require suppliers of all soy containing products to provide details on adherence to these standards and to provide copies of certification on Smart Supplier.

## Palm Oil

Palm oil is the most widely used vegetable oil in the world and has the highest yield when compared to other oil crops per hectare of land. If produced and sourced sustainably, palm oil can play an important role in providing for the growing demand for vegetable oil.

Suppliers must ensure that all palm oil used in Marston's products either, as an ingredient or as a processing aid, is RSPO certified. Evidence of certification must be provided on Smart Supplier.

Where palm oil is present the supplier will be required to provide a copy of the RSPO certification and ensure these are kept up to date.

## Environment

Suppliers must ensure the following:

- Waste and pollutants are minimised and disposed of in an efficient, safe, and environmentally responsible manner.
- Comply with international, national and sector codes of practice concerning the use of chemical products, including pesticides.
- Suppliers must seek to make continuous improvements in their environmental performance and, as a minimum, comply with the requirements of local and international laws and regulations.
- Suppliers must make practical efforts to minimise emissions and the use of energy, water and raw materials. Where possible these resources must be renewable. We encourage suppliers to collect and reuse water where possible and it is safe to do so.
- Suppliers must avoid contamination of the local environment and ensure that air, noise and odour pollution is within nationally defined limits.
- Measures to increase wildlife such as green walls, native species, wild-life friendly planting, wildflower meadows, wetland habitat, soil stores, flower beds for bees, owl boxes and hedging are all encouraged.
- Consider biodiversity through the lenses of dependencies, impact, and mitigation.
- Minimise the use of plastic and where possible, substitute for materials that have lower environmental impacts.
- Eliminate difficult or unnecessary single use packaging through better design.
- Reduce 'Food Miles' and ensure transport is low carbon where possible.
- Promote these values within your supply & distribution chains.

- Work with Marston's to understand and improve the environmental credentials of products.
- We promote and actively encourage suppliers to ensure that areas under agriculture, aquaculture, fisheries, and forestry are managed sustainably through the use of biodiversity through a substantial increase of the application of biodiversity friendly practices.

## Carbon Reporting

As the impacts of climate change unfold, the hospitality industry is taking action, united under a meaningful, practical plan to reduce, then eliminate, our carbon footprint. Marston's are members of the Zero Carbon Forum (ZCF). The ZCF is developing defined roadmaps backed by peers, government, and leading sustainability experts.

With the hospitality industry responsible for 20% of emissions in the food chain value, it's essential to have a collaborative effort to tackle the challenge of reducing emissions across the value chain.

Scope 1&2 emissions are associated with a company's direct operations and energy use. This makes them easier to track and manage compared to Scope 3, which are indirect emissions linked to the company's operations caused by the supply chain. Marston's has undertaken initiatives to improve Scope 1 & 2 emissions in the past, and we are actively looking at areas where we can further this.

Marston's Net Zero targets are Scope 1 & Scope 2 by 2030 and Scope 3 by 2040. To achieve this, we must collate detailed information on the emissions for our products and operations. We expect our suppliers to support us in this endeavour.

We are now turning focus towards our Scope 3 emissions as we know they account for over 90% of the overall emissions created by the hospitality industry. There are a number of different conversion factors and methodologies to measure footprints, which gives us inconsistencies. We are working with other members of the Zero Carbon Forum and Smart Supplier to align with WRAP emissions factors. A consistent approach is being developed by all users of Smart Supplier and in due course Smart Supplier will be used to collate carbon information at product level. Our preference is for product specific information to be provided but where this not possible then the system will enable WRAP reference data to be used.

Information required at product level will be:

- 'Do you have any data on your product carbon footprint?'
- If you do, then you will be asked to provide details of the carbon footprint per unit of product, the year the data applies to, what life cycle stages the footprint value relates to, methodology used to calculate and how representative the value is for the product.
- If you do not have carbon data available Smart Supplier will show the Standard Carbon Data Table and suppliers will be asked to select the closest matching product.
- Where there is no similar product, the supplier will be able to select a product category the from the Carbon Category Data Table

Collating this data will then enable us to evolve our menus and reduce emissions.

## Energy Use

- Suppliers must ensure that energy usage is minimised and reduce their carbon footprint by sourcing locally and minimising food miles.
- Marston's encourages the use of renewable energy to reduce carbon emissions.
- Suppliers will be asked to provide information on energy use, carbon reduction and water usage as part of the SAQ. The figure provided must be from the point of manufacturer to allow comparisons to be made and help support our work with the Zero Carbon Forum. An agent/broker should not provide their "office/depot" figures but instead provide details from the point of manufacture.
- The information required can be found in Appendix 1.

## Waste

Marston's operate as a zero waste to landfill business and where possible enforces the waste hierarchy. We strive to reduce the amount of waste generated through improving management practices and reducing packaging. For the packaging that is necessary to operate, we endeavour to move to more sustainable, reusable and recyclable materials. We are keen to promote the circular economy and develop further closed loop solutions to manage our waste as a commodity.

Suppliers are required to:

- Supply details of primary, secondary and tertiary packaging for all products on Smart Supplier.
- Avoid sending waste to landfill.
- Minimise packaging in products and distribution or substitute for those with lower environmental impacts without risking product preservation.
- Eliminate difficult or unnecessary single use packaging.
- Make 100% of plastic packaging recyclable by 2025, end use of difficult to recycle plastics e.g. PVC, black plastics.
- Ensure 30% of all plastic packaging to be made from recycled material by 2025.
- Ensure all non- plastic packaging is recyclable and easily segregated.

The table below shows Marston's preferred packaging materials:

<b>Green – Preferred</b> (Materials that are easily recycled in the UK and can have high % recycled content)	<b>Red – Avoid</b> (Difficult to recycle materials)
Glass	PVC
PET - Polyethylene terephthalate	Polystyrene
PE – Polyethylene (for flexible film)	Industrial compostable/biodegradable plastic
HDPE & LDPE	Oxo-degradable materials
PP - Polypropylene	Dark plastics e.g., black plastics, that are non-detectable at recycling plants
Steel	PLA – Polyactic acid
Aluminium	
Sustainably sourced wood, cardboard & paper	

## Task Force on Climate Related Financial Disclosures

Marston's are committed to reporting in accordance with the Task Force on Climate Related Financial Disclosures (TCFD). TCFD requires companies to disclose with their financial filings on four core areas to do with climate change: governance, strategy, risk, metrics (targets).

TCFD obligates companies to report the risks to their business model posed by an increase in global temperatures and its strategy to remain sustainable. The reporting must include explanatory scenarios based on different predicted increases in temperature. Whereas previous regulation on environmental reporting has focused upon reporting past emissions, TCFD requires the Board to report on the possible impacts in the future. Going forward we will look to engage with our suppliers on TCFD.

# ETHICAL TRADING

## SEDEX

Membership of SEDEX is a requirement to be able to supply to Marston's. Suppliers are asked to provide details of SEDEX membership and questionnaire as part of the SAQ. A copy of a SMETA audit can also be uploaded. Marston's expect transparency of supply chains – in modern economy supply chains have become increasingly complex stretching across various producers globally.

## Ethical Business Practices

Marston's maintains high ethical standards in carrying out its business activities and therefore will only trade with suppliers who adopt ethical business practices and adhere to strict principles that do not compromise our integrity and honesty. The SAQ on Smart Supplier requires a copy of the supplier's ethical policy to be uploaded.

## Legal Compliance

Suppliers must ensure full adherence to all relevant laws and regulations within their jurisdiction. Where there is a conflict between legal standards and these principles, the supplier must comply with whatever standard affords workers the highest level of protection.

## Health and Safety

Suppliers are required to adhere to all national and local Health and Safety regulations. Suppliers must ensure they conduct their business in line with industry best practice in their specific field.

## Seasonal/Agency Workers

Marston's may request information on the terms of employment and methods of recruitment of seasonal / agency workers.

## Pay

- Wages and benefits must be at least fully comparable with local industry benchmarks or national legal requirements, whichever is higher. Wages must always be sufficient for basic needs whilst still providing some discretionary income. Wages should be paid in full and on time, at agreed intervals.
- Before entering into employment, workers should be informed as to the payment process. Wages must be paid directly to the workers in the form of cash or cheques or into the workers' nominated bank account. Information relating to wages must be available to workers in an understandable form.
- No deductions from wages, other than those required by national law, must be permitted without the express agreement of the worker concerned. Deduction from wages for disciplinary purposes must not be permitted.

## Working Hours

- These should conform to industry benchmarks and local and national laws. Hours must not be excessive and include proper provision for sleep and resting time.
- Workers must 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 benchmark.
- Overtime should be voluntary, limited to no more than 12 hours per week, and not requested on a regular basis; it must be paid at a premium rate or in accordance with national legislation.
- There should be proper provision for rest and sleep. Breaks, holiday allowance and rest periods must be in full accordance with national law. Individual workers should have on average at least one full day's rest per 7 days or the equivalent if shift work is involved.

## Working Conditions

- We expect suppliers to provide suitable and safe working environments for all workers which, at the very minimum, uphold local standards.
- Every effort must be made to provide a safe and hygienic working environment. Adequate steps should be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work. Suppliers must have appropriate procedures in place to deal with serious injuries.
- Suppliers must complete fully documented risk assessments of their sites and accommodation provided, and regularly monitor risks posed to workers.
- Suppliers are expected to assign a senior management representative to be responsible for health and safety issues. Suppliers should set up procedures to consult with employees to seek their contribution in assessing the site's health and safety and in developing health and safety standards.
- No worker must be employed in potentially hazardous conditions without having received adequate safety training and supervision. Health and safety training must be commensurate with supplier's own health and safety responsibilities and must accord with the risk of hazard to which the worker is exposed.
- Records of safety training must be available for inspection on request. Individual workers must be able to demonstrate their understanding of the job and the ability to perform it to at least the minimum standard required by their employer.
- Suppliers must provide essential items of climatically appropriate protective clothing and safety equipment free of charge to their workers.
- Workers must be provided with access to potable drinking water, clean toilets and washing facilities.
- Where provided, accommodation must be safe, clean and meet basic needs.
- Secure storage facilities should be provided. Suppliers should provide a range of mixed gender, segregated and family accommodation as appropriate for the number of workers housed.
- Where management provides dedicated transport for the movement of the workforce to, from, or within the workplace, these must conform to the minimum standards set down in the appropriate national transport legislation. In the absence of such legislation, the management must make every reasonable effort to minimise risk to the workforce whilst transporting them.
- Food, beverages and domestic goods offered for sale to workers must be at price levels no higher than those prevailing nationally.

## Employment of Children and Young People

- Suppliers must clearly document and communicate their policies with staff for prohibiting child labour in the workplace.
- Our suppliers must not employ any worker who is either:
  - younger than the applicable legal minimum age of employment, OR
  - younger than the age of completion of compulsory education, whichever is higher.
- In any event, our suppliers are absolutely prohibited from the employment of those under the age of 15.
- Young workers are distinguished as those between the ages of 15-18. We expect our suppliers to give particular focus to the health and safety and educational needs of young employees.
- Young people aged between 15 and 18 must not be expected to work throughout the night or under potentially hazardous conditions.
- If the supplier discovers that children are working for the supplier involved, the supplier will be expected to cease the practice and provide remediation for the children concerned, including support for the child to attend and remain in quality education until no longer a child. The supplier must also immediately notify Marston's of any such occurrence.

## Forced Labour

- All work must be conducted on a voluntary basis and free from the imposition of any penalties or sanctions. We absolutely do not agree to purchase any products from any supplier produced through forced, bonded or involuntary labour. We will not tolerate slavery and human trafficking by any of our suppliers for Marston's, or any other purpose, and fully expect our suppliers to take active steps in ensuring the same. The SAQ on Smart Supplier requires a copy of the supplier's modern slavery statement to be uploaded.
- Suppliers must allow their employees the right to leave after giving reasonable notice. Workers must not be required to lodge deposits or I.D. papers unless it is a legal requirement to do so. In all circumstances these must be returned promptly upon cessation of employment.

## Freedom of Association and Employee Representation

- Suppliers' employees must have the fullest practicable rights of freedom of association. We encourage suppliers to share information with their employees and to develop effective mechanisms for consultation.
- Suppliers must recognise and respect the rights of workers to freely join associations (such as workers councils, trade unions and workers associations) which can collectively represent their interests. Employers must not interfere with or attempt to dominate or control such bodies, nor discriminate against workers choosing to belong to them.
- Suppliers should respect the rights of such workers' associations to represent their members, and to bargain collectively as defined and interpreted by the International Labour Operations (ILO) and national legal framework.
- Suppliers must share with their employees any information which will affect working conditions and develop effective mechanisms for consultation.
- Where the right to freedom of association and collective bargaining is not permissible under national law, suppliers should facilitate the development parallel means of independent and free association and bargaining.

## Treatment of Workers

- Physical abuse or the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is absolutely prohibited.
- Disciplinary and grievance procedures must be clearly documented and communicated to all employees. All disciplinary measures must be recorded.

## Equality of Treatment

- Provided that all workers show sufficient ability and capability, our suppliers must provide them with equal access to jobs.
- There must be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on (but not limited to) gender, age, disability, national origin, race, marital status, sexual orientation, political opinion, union (or non-union) membership, religion or caste. Workers must not be expected to perform duties incompatible with their physical or mental abilities.

# PRODUCT SUPPLY, REJECTION & RECALL

## Delivery Times

Deliveries direct to pubs, or to our Distribution Centres, must take place within agreed delivery times.

## Delivery Temperatures

The following temperature requirements apply to all frozen or chilled food deliveries:

- Chilled Goods: 1-5°C.
  - With respect to raw meats the recognised best practice is:
  - Poultry and raw meat preparations: 4°C
  - Offal: 3°C
  - Minced raw meat: 2°C
- Frozen Goods: -18°C or below.
- Frozen or chilled goods that fail to meet temperature requirements will be rejected.
- Previously rejected stock will not be accepted on redelivery without the written authority of the Marston's Technical Services Team. Rejected deliveries will be recorded as delivery failures and will be liable to cost recovery.

## Food Deliveries

All 'mixed' product pallets must be stacked in layers, with segregation between each layer. Case labels must be facing outwards and be visible.

All cases must be labelled with:

- Product code (both supplier and Marston's where possible).
- Description.
- Pack size – all case size and product weight changes must be notified to Marston's at least 6 weeks before the change is due to happen. This will prevent any deliveries being rejected.
- Date code - Suppliers must not mix date codes of the same product on a pallet and under no circumstances have shorter dated product hidden in the centre/core of a pallet.
- Storage temperature e.g. 'Store at or below -18°C.
- Specific special handling instructions.
- A GTIN-13 / GTIN-14 Barcode - any change to this barcode should be flagged to Marston's ahead of time.

Any products that fail to meet the agreed specification e.g. mouldy or damaged, will be rejected by the pallet i.e. if there is one affected case the pallet will be rejected. If damages are found within pallets at a later point, this will be reported to the supplier for rectification/replacement at the supplier's cost. Once unloaded, goods will be checked against the delivery sheet.

## Vehicle Requirements

Vehicles/trailers used for the transportation of food products must be suitable for the purpose, maintained in good repair, in a hygienic condition and not contain materials which compromise the safety or quality of the goods.

## Shelf Life

All date codes are checked and recorded. If shelf life, or validated product temperature, does not meet the agreed parameters, the stock will be rejected.

Marston's expect all frozen items to have a minimum of 9 months shelf life from point of delivery and ambient products to have 12 months. Anything less than this should be discussed with Marston's Supply Chain before delivery is made.

Pallets delivered into distribution centres must not have mixed BBE or Use by dates.

At times Marston's may make requests for shelf-life extensions for products to extend the life past the original BBE date. These are granted at the discretion of the supplier having considered food safety and quality.

## Product Non-Conformance

Any rejection is considered a serious breach of this agreement. It must be followed by a full investigation by the supplier identifying the causes, rectification proposal and long-term preventative actions. Suppliers will also be liable to cost recovery.

## Rejection and Recall

Safety and quality issues resulting in rejections or full recalls from pubs within Marston's is considered a material breach of contract.

We will recall a product when:

- The product is unsafe for human consumption.
- The product quality is at such a level that consumption could be commercially damaging.
- A foreign body is found and believed to have come from the manufacturing process.
- A significant number of complaints from pubs through the Catering Hotline.
- At the request of the manufacturer.

Marston's will communicate the need to recall both verbally and in writing to the supplier.

Where a product is recalled from pub, we will give pubs 7 days to return stock to depot.

The supplier will then need to collect recalled product from depot within 7 days.

Marston's and A F Blakemore will confirm the quantity to be collected and the credit required – credit should be forwarded to A F Blakemore within 30 days.

It may be necessary to recoup costs from the supplier for loss of sales/reputation during the period product was not available – this will be discussed as each situation arises.

If a supplier is aware of a problem with a product that requires recall, then they should contact the Head of Technical or Catering Hotline on 01902 329133 as soon as they are made aware of the problem themselves.

## Supplier Responsibility

It is the responsibility of the supplier to notify Marston's immediately if it becomes aware of any defective goods which have been supplied to the Distribution Centre or pub directly.

Defective goods are defined as any goods that are unsafe or unfit for consumption, use or which fail to comply with the specification. This will include, but is not limited to:

- Product safety, quality or legality.
- Foreign objects or infestation.
- Product labelling.
- Product packaging.

In the event that the Supplier notifies Marston's of any defective goods, or Marston's has reasonable grounds to believe that any of the Supplier's goods are defective.

Marston's may, at its sole discretion, recall all affected goods or agree a course of remedial action with the Supplier.

The following information must be provided when reporting defective goods:

- Batch numbers.
- Product details.
- Product code and date codes.
- Full description of the problem.
- Amount of goods affected.

## Guest Complaints

Marston's receive quality complaints from pubs and guests who visit them. Together with our suppliers we need to ensure that every complaint is thoroughly investigated and that the guest is responded to in a timely manner. Any complaints left unresolved for too long generate a negative impression for the guest.

Any complaints on product quality or foreign bodies will be directed from our Catering Hotline. The hotline operates 5 days a week 8am until 5pm and Bank Holidays 9am until 3pm. Our pubs contact us via email or phone with any product issues they may have.

The Catering Hotline will transfer any complaints for quality or foreign body onto Smart Supplier. Information will include date codes, batch code, product code, nature of the complaint, photographs (if available) and pub contact details.

The product/foreign body in question will be held at the pub. It is the supplier's responsibility to make contact with the pub by phone within 24 hours of being notified of the problem. The supplier should make every effort to collect any affected product/foreign body to enable them to complete a full and thorough investigation. Where collection is not possible the supplier must tell the pub to post the item to them via registered post. It is not necessary to send a SAE to the pub as this will delay the investigation.

The supplier must provide a written response to every complaint within 7 working days on Smart Supplier. The response does not need to be sent to the pub as Marston's will handle that communication.

Where credit is due to the pub for the affected product this should be covered in the response. The Supplier is responsible for providing A F Blakemore with a credit note so that it can be passed onto the pub. Suppliers are not to send cheques, vouchers or cash to the pub as recompense for the complaint. Where replacement product is offered to the pub the supplier must arrange direct delivery of said product to the pub – we cannot arrange this via A F Blakemore.

Suppliers are only to contact the pub who raised the quality problem, they are not to make contact with the actual guest.

# Appendix 1

## SAQ

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### Marstons SAQ

[Company Details](#)

#### 1 Company Details

##### SAQ Part 1

1.1 Do you have an Animal Welfare Policy that conforms to the Marston's Food Supplier Charter? If Yes, please provide a copy.

Yes  No  NA

Select files...

Drop files here to upload

1.2 Do you follow the RSPCA Five Freedoms policy?

Yes  No

1.3 Do you have a policy to monitor and reduce the use of antibiotics? If Yes, please provide a copy of your reduction plan and provide information on the type of antibiotic use.

Yes  No  NA

Select files...

Drop files here to upload

1.4 Does your policy allow the use of prophylactic antibiotics?

Yes  No

1.5 Does your policy allow the use of metaphylactic antibiotics?

Yes  No

1.6 Does your policy allow the use of therapeutic antibiotics?

Yes  No

1.7 Do you have evidence of annual DNA testing for horsemeat in all meat and minced meat products? If Yes, please provide a copy.

Yes  No  NA

Select files... Drop files here to upload

1.8 Do you carry out any residue testing for chemicals and pesticides? If Yes, please provide a copy.

Yes  No

Select files... Drop files here to upload

1.9 Do you have full compliance with all relevant food legislation e.g. food additives, novel food, food labelling, food flavours and colours?

Yes  No

1.10 Does the company have a documented product withdrawal and recall procedure? If Yes, please provide a copy.

Yes  No

Select files... Drop files here to upload

1.11 Do you have a procedure to control non-conforming product? If Yes, please provide a copy.

Yes  No

Select files... Drop files here to upload

1.12 Do you have a documented HACCP plan for the products supplied and does it cover allergens? If Yes, please provide a copy.

Yes  No

Select files... Drop files here to upload

1.13 Does the business have a documented incident and emergency procedure in the event of an incident that may impact food safety, legality or quality? If Yes, please provide a copy.

Yes  No

Select files...

Drop files here to upload

1.14 Do you have a CSR statement? If Yes, please provide a copy.

Yes  No

Select files...

Drop files here to upload

1.15 Do you have and Ethical Policy that conforms to the Marston's Food Supplier Charter? If Yes, please provide a copy.

Yes  No

Select files...

Drop files here to upload

1.16 Do you have a Modern Slavery Policy? If Yes, please provide a copy.

Yes  No

Select files...

Drop files here to upload

1.17 Do you follow the Corporate Code of Ethics published by CIPS (Chartered Institute of Procurement & Supply)? If Yes, please provide a copy.

Yes  No

Select files...

Drop files here to upload

1.18 Do you have SEDEX membership? If so please provide your membership number so that we can initiate a relationship with you.

Yes  No

1.19 Have you completed a SEDEX questionnaire or received a SMETA audit? If Yes, please provide a copy.

Yes  No

Select files...

Drop files here to upload

1.20 What is your total annual energy consumption in kWh?

1.21 What is the % of your total energy use that is being provided by renewable energy (if not all)?

1.22 What are your total annual carbon emissions in CO2e?

1.23 Have you got a target to reduce CO2e? If so by how much?

Yes  No

1.24 What is your total annual water use in m3?

1.25 Have you got a target to reduce water consumption? If so, by how much?

Yes  No

1.26 Do you have a policy in place and a certificate for the Chemicals and Pesticides? If Yes, please provide a copy.

Yes  No

Select files... Drop files here to upload

1.27 Are any Chemicals or Pesticides used on any of the ingredients in the product?

Yes  No