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## **Supplier Code of Conduct**

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Distributed to all DO & CO Suppliers

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We are formulating a Supplier Code of Conduct to guide the suppliers of our expectations regarding their commitment and respect towards environmental, social and governance matters. Suppliers should expect that our decision-making and contract criteria will be adjusted to reflect our standards with the declared Supplier Code of Conduct. This Code of Conduct applies to direct and indirect suppliers of DO & CO (whereby the applicable DO & CO Purchasing Conditions define “supplier” as every natural or legal person to which one or more orders from DO & CO are addressed).

DO & CO is committed to international human rights and environmental sustainability and therefore expects all suppliers to fully honour all applicable national and international laws and regulations, to comply with DO & CO Purchasing conditions as well as its relevant policies and values expressed in them as well as in its code of conduct.

This Code of Conduct is hence meant to ensure that DO & CO procures goods and services in a fair, impartial, transparent, cost-effective, competitive, and efficient way, while at the same time adhering to DO & CO’s applicable rules, procedures, and policies.

Suppliers shall consider the Supplier Code of Conduct as a prerequisite Environmental, Social and Governance standards for any contractual agreements. Suppliers are required to assure to comply with this policy ahead of being approved as a supplier, or before the first delivery.

Suppliers should also allow audits with adequate notice from DO & CO.

Suppliers are hence required to comply with the national and international laws and regulations, as well as DO & CO-specific environmental, social and governance practices.



THE GOURMET ENTERTAINMENT COMPANY



## Environmental

- **Compliance:** Suppliers must adhere to all applicable environmental laws and regulations, in particular, avoid environmental harm (through, inter alia, water pollution, the use of chemicals and hazardous substances etc) that can amount to human rights violations of individuals or communities. Any environmental violations resulting in monetary or non-monetary penalties or sanctions should be addressed appropriately via a defined action plan.
- **Management and performance:** Suppliers shall aim to continuously improve their environmental protection measures via appropriate environmental improvement programmes. Suppliers shall work to sustain, protect, and restore the environment, by such means as energy conservation, waste management initiatives and environmental restoration. Suppliers shall conduct ongoing monitoring and modelling to determine their Use-of-Natural-Resources (UNR). To improve environmental performance, suppliers shall commit to investing in research and implementing technologies and practices that reduce and mitigate any adverse impact of the Company's and Supplier's UNR on the natural environment. Suppliers shall develop an awareness training program to affirmatively communicate this Policy and specific UNR-related issues to employees and suppliers.
- **(Hazardous) Waste:** Suppliers shall ensure that waste is disposed of according to applicable laws and regulations. Suppliers should keep records of waste produced on-site and segregate waste based on material. Waste should be disposed of based on appropriate waste disposal permits and treated prior to releasing it into the environment.
- **Air and Carbon Emissions:** Suppliers should work towards an emissions reduction plan to reach at least national Net Zero targets. Where no national Net Zero Target has been defined Suppliers shall work towards a Net Zero 2050 Target. For other air emissions, odours and fumes exhaust hoods should be used effectively. Suppliers should work towards conducting annual air samplings.
- **Animal welfare:** Suppliers shall ensure that animals are treated humanely as per all local and national regulations around animal welfare, including best practices around space, antibiotic use, and physical alterations. DO & CO endorses the Farm Animal Welfare Council's (FAWC) Five Freedom principles on animal welfare (i.e., Freedom from hunger and thirst, freedom from discomfort, freedom from pain, injury or disease, freedom to express normal patterns of behaviour, freedom from fear and distress). Suppliers are expected to manage their operations following FAWC's five principles. Animal welfare practices shall be applied at the farm level, during transportation and at abattoir/slaughter. Suppliers should expect DO & CO to establish targets around cage-free eggs, broiler chicken, sustainable sourcing of fish and seafood, sustainable sourcing of dairy products, gestation crate-free pork and associated requirements to suppliers.
- **Policies and procedures:** Suppliers shall have an appropriate written policy for environmental protection. Suppliers should also work towards environmental management systems such as EMAS, ISO 14001, ISO 14005 or similarly recognised programmes.

## Social

DO & CO is committed to respecting human rights wherever we do business. We will follow this commitment by implementing and strengthening our operations and working with our Suppliers to prevent and remedy adverse human rights impacts. We expect our Suppliers to conduct business and manage risks in a manner that is consistent with our own and international human rights principles. Our practices are informed by international guidelines including:

- The ILO Declaration on Fundamental Principles and Rights at Work





- The Universal Declaration of Human Rights
- The UN Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises

#### **Modern slavery, Forced Labour, Child Labour, and Human Trafficking:**

- **Employment Conditions:** Suppliers must not subject anybody to slavery or servitude. Suppliers will not use forced, bonded, or coercive labour or engage in any kind of human trafficking. Suppliers will not charge employees any fees to secure their employment or placement. Workers must be free to consent to enter employment at any time, with reasonable notice following applicable laws and collective agreements. Suppliers shall have appropriate procedures, such as policies, governance systems and/or due diligence processes, to ensure that no forced or involuntary labour is performed. Suppliers shall make the effort to inform all employees in a written manner of their terms and conditions of employment within the respective policy.
- **Documentation:** Original Identification cards shall be in the possession of employees or only retained by the company as permitted by law. When documentation is retained as permitted by law, the employees must be aware of the law and how to retrieve the personal document and have the opportunity in actual practice to retrieve the document without the threat of retribution.
- **Prison Labour:** Suppliers shall ensure that any use of prison labour follows legally sanctioned rehabilitation programmes, is productive and is managed within all relevant regulatory standards. Hours, remuneration, and access to a transparent complaint process should be fair and reasonable.
- **Minimum age:** Suppliers shall have procedures in place to guarantee that the minimum legal age of employment is observed and that all managers and workers are informed about it. Suppliers should require proof of age from candidates before being hired, with copies kept on file where deemed necessary. Where the minimum age of employment is not defined, the minimum age shall be 15 years of age. Special protection restrictions on night shifts, dangerous work or handling hazardous substances shall be following local laws and regulations. Working hours should follow legally binding regulations and should not interfere with the compulsory education of young workers.

#### **Discrimination:**

- **Anti-Discrimination practices:** Suppliers shall not discriminate against employees based on race, colour, national origin, gender, gender identity, sexual orientation, religion, disability, or any other reason that is prohibited by applicable national laws and regulations. Non-discrimination practices shall be applied to hiring, promotion, salary, performance evaluation or any other term of work conditions.
- **Facilities and Practices:** Suppliers shall provide facilities to employee groups with special needs (e.g., disabled employees, pregnant women, and employees requiring facilities for religious expression); Parental leave shall be provided as required by applicable laws and regulations; Suppliers shall ensure that employees can raise concerns without retaliation and that sufficient resources are allocated to the investigation and remedy of incidents.
- **Diversity and inclusivity:** Suppliers should work towards action plans to increase their diversity and inclusivity within their organisation and introduce annual progress reports on their plans.
- **Policies and procedures:** Suppliers shall have appropriate written policies, training, and procedures in place to ensure that anti-discriminatory practices are followed, facilities and provided, and employees are hired, promoted and remunerated based on factors relevant to their job performance rather than race, ethnicity, gender or other requirements that have the purpose of excluding certain classes of people.





#### Freedom of Association:

- **Practices:** Where applicable, suppliers shall ensure that employee representatives are freely elected without management interference and are recognised within the organisation as required by the applicable law. Employee representatives shall be allowed to carry out lawful activities related to employees' rights and interests without management interference. No employee shall be discriminated against based on union support or opposition.
- **Policies and procedures:** Suppliers shall ensure that appropriate written policies are in place that allows employees to associate freely at the workplace following applicable law.

#### Abuse of Labour:

- **Abuse prevention:** Suppliers must ensure that employees and other workforce members who are treated with dignity are not physically, mentally, or verbally harmed in the working context. Incidents of abuse or harassment and their remedies shall be recorded and kept on file.
- **Policies and procedures:** Suppliers shall ensure that appropriate written policies are in place that prevents harassment and abuse following applicable laws and regulations. Managers and supervisors shall receive training on appropriate disciplinary practices.

#### Workplace Health and Safety:

- **Health and Safety Management:** Suppliers shall ensure that their facilities have Health & Safety programmes in place, ideally following internationally recognised standards such as the OSHAS 18001. Appropriate action plans shall be implemented in the case of any Health & Safety incidents.
- **Objectives and tracking:** Suppliers shall define Health & Safety objectives and monitor their performance. Any workplace injuries shall be reported by employees via an established process. Root-cause analyses shall be conducted to prevent, reduce, and eliminate causes for injuries and ill health. Suppliers shall create processes to identify, evaluate and control workplace hazards relating to chemical exposure, biological agents, noise, vibration, radiation, and fire as well as any hazards arising from the operation, maintenance and testing of equipment, plants and other infrastructure relating to the nature of the business. Employees shall be provided with appropriate Personal Protective Equipment (PPE).
- **Training and instruction:** Suppliers shall ensure that all employees are provided with adequate health and safety training, information, and instructions. Suppliers shall establish emergency plans for all workplaces in case of fire, medical emergency, natural disaster, and severe weather.
- **Work conditions and welfare:** Suppliers shall ensure that workplaces are adequately illuminated and at an appropriate temperature to protect employees from injury or ill health. Employees shall have access to potable drinking water and toilets that allow worker privacy. Where canteens are located on-site, hygienic utensils, sufficient tables and seats shall be provided for employees. Where employee housing is provided, suppliers shall ensure that living conditions are at the same standards for health and safety as those that apply in the workplace and that the employee's dignity and right to privacy are respected.
- **Policies and procedures:** Suppliers shall ensure that appropriate written policies and procedures are in place and that management is informed to secure Workplace Health and Safety. Appropriate roles and responsibilities shall be assigned to ensure that Health and Safety accountability has been assigned within the organisation.

#### Wages and Working Conditions:

- **Wage:** Suppliers shall pay employees no less than minimum wage following applicable laws and regulations. Where the applicable law does not set a minimum wage, suppliers shall pay at least



the prevailing market wage. Overtime work shall be compensated as required by legally mandated premium rates.

- **Benefits:** Suppliers shall ensure that benefits are provided at least following applicable laws and regulations, labour contracts or collective bargain agreements and within legally required time limits.
- **Payroll:** Suppliers shall ensure that payrolls and information about wages, incentive systems, bonuses, benefits, and deductions are recorded accurately and communicated in languages understood by their employees. Wages shall be paid out accurately and on time following the applicable law.
- **Working hours:** Suppliers shall ensure that employees' working hours, maximum hours limitations, breaks and rest days are in the range with mandated by applicable laws and regulations. Suppliers shall not demand employees to work more than legal overtime thresholds, except in emergencies based upon the nature of the work.
- **Collective Bargaining:** Suppliers shall respect the freedom of association and collective bargaining rights following the applicable law. Where applicable, suppliers shall hold regular consultations with trade unions or other legal workers' representatives.
- **Policies and Procedures:** Suppliers shall guarantee that appropriate policies and procedures are in place to secure that wages, benefits and other work conditions are respected as mandated by the applicable law and described in the Supplier Code of Conduct.

#### **Land rights:**

- **Policies and procedures:** Suppliers shall ensure that the land rights of individuals, indigenous people and local communities are respected as part of a company policy. Suppliers shall implement a system for due diligence to uncover and disclose risks and impacts to communities related to land issues.

#### **Food safety:**

- **Compliance:** Suppliers must accurately disclose any information relevant to food safety, comply with all applicable national and international laws and regulations and ensure supplied products or services do not contain or involve chemicals or hazardous substances that may be of concern to consumers.

#### **Information security:**

- **Information and Personal Data:** Suppliers must protect DO & COs and third-party non-public information. Suppliers must adhere to all relevant data protection laws and regulations, including EU GDPR.

## **Governance**

DO & CO is committed to the highest standards of business integrity and does not accept practices that are inconsistent with the associated principles. We seek suppliers that conduct business with the highest ethical standards as follows:

#### **Corruption and Bribery:**

- Suppliers must refrain from illegal actions that may constitute corruption or bribery offences under national or international laws and regulations.



**Conflicts of Interest:**

- DO & CO workers and suppliers should avoid circumstances that may result in a conflict of interest or breaches of policies, laws, and regulations. Any acceptance or granting of favours, material or immaterial, must be following DO & CO policies and internal instructions, as well as national and international laws and regulations.

**Competition:**

- Suppliers shall not engage in anti-competitive behaviours, including but not limited to agreeing with competitors, expressly or tacitly, on pricing or the terms of deals. Suppliers shall not make agreements with competitors to divide markets or clients.

**Business and Financial Records:**

- Suppliers must follow all applicable laws and regulations regarding financial recordkeeping and reporting. Suppliers shall also provide accurate and timely reporting of information – financial and non-financial – reasonably required by DO & CO to comply with applicable laws and regulations.

**Confidentiality:**

- Suppliers must keep any information received by or about DO & CO strictly confidential.

**Implementation**

Suppliers shall ensure that all managers and supervisors within their operations and throughout their supply chain are familiar with the principles of DO & CO's Code of Conduct. An appropriate communication and action plan shall be created and rolled out to secure that the necessary procedures and behaviours are adopted.

Suppliers are required to take all necessary steps to prevent any practice inconsistent with national and international prohibitions and other breaches in the areas mentioned. Suppliers are also required to put in place effective monitoring and complaints procedures to detect potential transgressions. Suppliers are expected to disclose preventive measures taken and potential complaints filed within their organisation to DO & CO insofar as DO & CO might suffer damage or disadvantage from any such event or action.

Suppliers may, under the below-mentioned circumstances, be restricted from current and future business with DO & CO for a term determined by DO & CO.

- Failure to comply with national or international laws and regulations.
- Non-performance/non-compliance with commitments to DO & CO and its policies and requirements, including mentioned matters relating to environmental, social or governance issues.
- Unethical actions and behaviours, or suspicions thereof, that threaten to harm DO & CO's reputation and abuse of DO & CO's various policies.

Until corrective actions have been implemented by restricted suppliers (including in their supply chain), DO & CO reserves the right not to do business with those suppliers.

A handwritten signature in blue ink, consisting of a stylized, cursive letter 'P'.



## Responsibilities:

**Sustainability Team:** the sustainability team ensures that the Supplier Code of Conduct is always up to date and reflects on stakeholder inquiries regarding external communications. The Supplier Code of Conduct is therefore reviewed on an annual basis and cross-checked with the other responsibility holders to inform them of any changes that might have occurred.

**Legal department:** The legal department is responsible for compliance with national and international legislative frameworks. It will therefore inform the external communications team of any contractual conditions regarding the topic of external communications with partners. Furthermore, it will provide the Sustainability Team with information regarding the changes in legislation such as the EU Supply Chain laws, which might result in the adaptation of the Supplier Code of Conduct.

**Purchasing Department:** The purchasing department is responsible for that our supplier complies with and commits to the Supplier Code of Conduct. Supplier and supply chain audits will become the norm to check that these policies are adhered to. They must also claim a signed statement from possible and current suppliers.

A handwritten signature in blue ink, consisting of a large, stylized letter 'P' with a loop at the top and a tail that curves back up to meet the stem.



SUPPLIER'S ACKNOWLEDGEMENT

I, the undersigned, as an authorized representative of the company identified below ("the supplying Company"), acknowledge receipt of the DO & CO Supplier Code of Conduct.

I pledge to:

- Read the contents of the Code and share relevant aspects of it with employees and subcontractors of the supplying Company who support DO & CO
- Convey any comments, questions, or suggestions about the Code with my primary DO & CO contact(s)
- Strive to align the supplying Company's actions and policies to following the Code of Conduct, as well as all relevant laws, regulations, and guidelines of the countries in which the Company operates.
- Agree to allow on-site and remote supplier audits conducted by DO & CO.

Further, I understand that the goal of the Supplier Code of Conduct is to conduct business responsibly and that I will work with DO & CO to ensure that the supplying Company and its representatives continually strive to always act with integrity.

Name of supplying Company \_\_\_\_\_

Name and Title \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

A handwritten signature in blue ink, consisting of a large, stylized letter 'R' with a loop at the top and a tail that curves back up to meet the top loop.