



SUPPLIER CODE OF CONDUCT

A WORKING PARTNERSHIP IN LINE WITH FULLER'S VALUES



TABLE OF CONTENTS

DOING THINGS THE RIGHT WAY

01

WHAT YOU NEED TO DO

02

OUR PEOPLE

03

OUR WAY OF DOING BUSINESS

04

OUR PEOPLE

05

OUR COMMUNITIES

CONTACT US

DOING THINGS THE RIGHT WAY

We recognise the enormous contribution that our suppliers make, whether that be in food, drink, services, IT, property and more, that enables Fuller's to be what it is today. As a key part of our supply chain, we expect our suppliers ('suppliers' / 'you') to adhere to certain minimum standards. This Code of Conduct sets out these standards, and we appreciate your continued support as a supplier to enable us to uphold Fuller's values.

Through our sustainability strategy *Life is too good to waste*, we want to ensure we operate in an ethical and sustainable way both within our business and throughout our supply chain.

We protect and respect the things that matter – our people, our planet and our communities – and we strive to work with suppliers who share our standards and operate with the same responsible business approach. As partners, we want to ensure that together we are always doing things the right way.

Pubs have always played a vital role in the communities in which they operate, and Fuller's pubs and hotels are no exception. However, it's not just our immediate neighbourhood that we have a responsibility to – we are constantly looking at ways we can reduce our impact on the environment, support our local communities, and develop our team members.

Thank you for taking the time to read our Code of Conduct. We look forward to working with you and our continued relationship.



Finance Director
June 2025

01

WHAT YOU NEED TO DO

COMPLY

Comply with the obligations in this **Code of Conduct** – including the requirements to meet our **standards** set out in each section ('standards'). This is not meant to override any standards in your own code of conduct, any contractual obligations between us or any legal obligations on you. If there is a conflict, we expect you to comply with the most stringent obligations, in a way that complies with the law.

WORKING PRACTICES

Put in **place working practices** that make it possible for you to comply with the standards through your own policies and procedures including, but not limited to, stakeholder engagement, written policies and staff training.

STANDARDS

Consider whether your own suppliers meet the standards including through due diligence and risk assessments, and do not sub-contract any of the provision of goods or services provided to sub-contractors where you have any unresolved concerns. Where you have any material concerns around a sub-contractor, we expect you to stop using such sub-contractors immediately.

KEEP UP TO DATE

Keep up to date with any changes to our Code of Conduct – we may amend it from time to time and the most recent version will always be available on our website at: fullers.co.uk/corporate/suppliers. If we make any significant changes to our Code of Conduct, we will email suppliers to notify them of the changes.



COMPLIANCE

Monitor your compliance with our Code of Conduct and keep records of this. We reserve the right to monitor your compliance with this Code of Conduct either through reviews or audits conducted by us / our professional advisers or by asking you to submit information related to your business dealings with us as part of self-monitoring checks. If you become aware of any failure to comply with the standards, we expect you to tell us promptly.

CO-OPERATE

Co-operate with us if there are any failures on your part to meet the standards so this can be investigated, discussed and rectified if possible.



RESPONSIBLE SOURCING

Ensure you comply with Fuller's Responsible Sourcing Statement and Environmental Policy which are available here: fullers.co.uk/corporate/suppliers

These standards are a key requirement for working with Fuller's and ensuring we, and our supply chain, are doing things the right way. Where a supplier fails to meet the standards, we may stop working with that supplier and we reserve the right to terminate our agreement with them.

02

OUR PEOPLE

Doing things the right way for us means: recognising that our differences are our strengths, creating a working environment of safety, care and respect, and ensuring that everyone has a place, a voice and an opportunity to shine.



DIVERSITY

We celebrate differences in our people, perspectives, behaviours and ideas.



EQUITY

We treat everyone fairly and give them the same opportunities.



INCLUSION

We create a sense of belonging, where everyone is welcome.

WHAT DO YOU NEED TO DO TO MEET OUR STANDARDS?

HUMAN RIGHTS

- Comply with all applicable laws relating to human rights, modern slavery and human trafficking.
- Treat all your employees, workers and other individuals utilised in providing your services to us ('your people') humanely and with safety, care and respect.
- Not use (directly or indirectly through your sub-contractors) any underage or forced labour.
- Firmly oppose human trafficking.

EMPLOYMENT AND FAIR TREATMENT

- Comply with all applicable laws relating to your people including their employment rights and rights to be treated fairly.
- Facilitate an inclusive culture and working environment where your people are treated with respect and fairness regardless of their personal characteristics.
- Treat applicants for jobs with respect and fairness regardless of their personal characteristics and carry out recruitment in an ethical and responsible way.
- Ensure that people are not unfairly or unlawfully harassed, discriminated against or subject to abuse or degrading treatment of any kind.
- Facilitate open communications including allowing all individuals to raise any complaints or grievances about any wrongdoing by you / your people in a safe environment without being penalised, discriminated against or suffering any detriment.



03

OUR WAY OF DOING BUSINESS

Doing things the right way for us means doing business in an ethical and safe way, including taking active steps to prevent the occurrence of negative business practices (including fraud, bribery, corruption or tax evasion) or those that could harm our customers or your people (such as poor quality procedures). We respect others' confidentiality, intellectual property and data rights.

WHAT DO YOU NEED TO DO TO MEET OUR STANDARDS?



QUALITY STANDARDS

- We may audit you and you must ensure traceability of your goods or services can be provided to us.

WHERE YOU SUPPLY GOODS OR SERVICES TO US:

- Put in place robust safety and quality standards so that applicable laws are complied with, industry standards are maintained, and no harm can come to our people or customers.

HEALTH AND SAFETY

- Comply with all applicable laws relating to health and safety as well as relevant industry standards.
- Investigate any injuries as a priority and take remedial action to prevent their recurrence.

- Provide a safe and healthy environment for all your people, visitors and other relevant individuals that complies with all applicable laws.
- Have in place robust health and safety management systems, appropriate staff training and provide safe equipment to ensure injuries are kept to a minimum.

IP, CONFIDENTIALITY, IT AND DATA SECURITY



- Comply with all applicable laws, guidance and best practice relating to data protection, data ownership and cyber security.

- Keep our confidential information (including our business information and personal data you process further to your dealings with us) confidential.

- Only disclose our confidential information where permitted by us and not use or exploit our confidential information in any way except as strictly necessary for the performance of your contractual dealings with us.

- Put in place robust and best practice technical and organisational data protection measures to keep safe and secure any data you hold related to us and your business dealings with us.

- Notify us promptly if there is a personal data breach affecting Fuller's personal data – we may terminate our agreement with you if there is a personal data breach affecting Fuller's personal data.

- Co-operate fully to remedy any personal data breaches.

- Comply with our data protection requirements and policies and procedures.

- Agree and sign into a Data Processing Agreement (DPA) when you are processing personal data on our behalf and acting as a Data Processor.

- Only use artificial intelligence (AI) to provide goods or services to us if we are informed in advance, adopt responsible and ethical practices when developing and using AI and never input our data into any AI system or model without our written consent.



04 OUR PLANET

Doing things the right way for us means having responsible practices in place to manage the environmental impact of our business dealings and working to continually improve the sustainability of our business. We take active steps to minimise practices with harmful environmental impacts and look for opportunities to positively improve sustainability in our business dealings.



WHAT DO YOU NEED TO DO TO MEET OUR STANDARDS?

- Develop plans to achieve Net Zero on or before 2040 to align to our commitment in relation to achieving our Net Zero targets across our supply chain.
- Comply with all applicable environmental laws, certifications and specifications relevant to the products or services provided by you to us.
- Operate your business in a responsible and sustainable manner which cares for and respects our planet.
- Regularly assess your environmental and climate performance and identify the risk and impacts of your business.
- Work to improve your environmental and climate performance, including by reducing negative impacts (e.g. carbon emissions and pollution) and contributing positively to the environment where possible.
- Take steps to reduce the amount of material resources you use to operate your business and follow the principle of reducing, reusing, and recycling wherever possible.
- Work co-operatively with us to reduce the environmental impact of the services / goods provided by you to us – including not only climate but the impact on biodiversity, land use and water use.
- Ensure products are sourced with zero associated deforestation and be able to provide traceability to support this.
- Report your carbon emissions on an annual basis in a format defined by Fuller's and demonstrate steps are in place to reduce emissions – with any high carbon impact products you will be required to provide a more detailed carbon footprint and provide guidance on opportunities to further reduce the impact of the product.
- Where relevant to your business dealings with us, maintain high standards of animal welfare.

05

OUR COMMUNITIES

Doing things the right way for us means being active in and supporting our local communities, where possible, including partnering with charities whose values align with ours through donations and partnership opportunities.



WHAT DO YOU NEED TO DO TO MEET OUR STANDARDS?

- Take steps to support your local communities, charities and businesses that promote your and our values where possible.
- Facilitate the redistribution of surplus food in the community where possible.

CONTACT US

IF YOU HAVE ANY QUESTIONS
THEN PLEASE CONTACT THE COMPANY SECRETARY



FULLER, SMITH & TURNER P.L.C.
PIER HOUSE, 86-93 STRAND-ON-THE-GREEN, LONDON, W4 3NN

T +44 (0)20 8996 2000 E company.secretariate@fullers.co.uk

FULLERS.CO.UK