

TESCO EXTERNAL REQUIREMENT

Title: Human Rights requirements for food and grocery non-food suppliers	
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Document Author: Rachel Munns Role: Responsible Sourcing Manager Department: Responsible Sourcing	Document Owner: Sophia Cochrane/Andy Hickman Role: Head of Human Rights Department: Responsible Sourcing

Document Overview

This document details Tesco’s human rights approach for own label food suppliers and non-food grocery suppliers, supplying into Tesco UK and ROI. This includes details of where we require ethical audits and where we expect suppliers to take additional steps to protect workers in our end-to-end supply chains.

Market Of Sale	Business Unit
United Kingdom	Food
Republic Of Ireland	Non Food Formulated

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1. Purpose & Scope

This document details Tesco’s human rights approach for own label food suppliers and non-food grocery suppliers, supplying into Tesco UK and ROI. This includes details of where we require ethical audits and where we expect suppliers to take additional steps to protect workers in our end-to-end supply chains.

Adherence to these requirements is a condition of supply to Tesco. Suppliers and sites are expected to read and implement the requirements, in addition to ensuring all sites are compliant with the [ETI base code](#).

Suppliers must inform Tesco of any Human Rights concerns, allegations and/or fatalities and serious injuries against their organisation or supply chain as soon as they are made aware.

2. Detailed Requirements

Our Human Rights Approach

Our approach to addressing and avoiding human risks in our supply chain is based on 3 pillars:

- a) **Improve** – respecting the rights of people working for our suppliers, using audits and certification to assure that human rights standards are observed and safeguarded.
- b) **Transform** – addressing endemic labour issues throughout key supply chains through partnerships with suppliers, civil society and industry.
- c) **Advocate** – using our convening power to advocate for change, where needed.

Tesco's human rights programme is embedded throughout our operations and is fundamental to the commitment we make to our customers to source our products responsibly. We are committed to upholding human rights and fully support the [UN Universal Declaration of Human Rights](#), the [International Labour Organization Fundamental Principles and Rights at Work](#), the [UN Guiding Principles on Business and Human Rights](#) and the [UN Global Compact](#).

This policy outlines the requirements under each pillar. For more detail about how we work, please refer to on [our approach to human rights](#) in our supply chain.

Improve

Our Improvement programme focuses on compliance with labour laws and the ETI base code, verified through the use of audits and certification – see [Certification Commitments](#) for further information.

Upholding the ETI base code is one of the requirements for our suppliers of doing business with Tesco. Suppliers are required to show compliance with the ETI base code and labour laws, for example working towards the eradication of recruitment fees and upholding women's rights. Our suppliers are required to communicate our requirements along their supply chain and to relevant stakeholders.

Different requirements are applicable depending on which countries suppliers operate in. The country risk assessment has been developed by the Food Network for Ethical Trade (FNET). The assessment rates countries from high to low risk. The outputs of this can be found in the [Country List](#) at the bottom of this document.

We focus our compliance program on areas of highest risk. Suppliers should use the list to identify where they are sourcing from high risk countries or countries with additional requirements or exceptions.

Our requirements apply to all primary sites. In addition, we also apply our requirements to all end-to-end sites (including all packhouses, approved growers and any other processing site along the supply chain) supplying into Produce and Horticulture as well as Protein supply chains.

a) Ethical Audit Requirements

Sedex site registration – **applies to all primary sites, as per TQC, regardless of their country risk rating:**

- Supplier sites must be registered on Sedex with a completed SAQ.
- Suppliers must link to the relevant Tesco UK category on Sedex and provide full visibility to Tesco.
- Suppliers are required to update their SAQ annually, or when business changes occur.
- All primary sites must be registered on TQC and insert the correct Sedex site code (ZS), regardless of their country risk rating.

Audit requirements – **applies to all primary sites, as per TQC, in high-risk countries:**

- All primary sites in high-risk countries require a SMETA audit on an annual basis. We also accept SIZA in South Africa and SA8000 in all regions excluding Latin America.
- **However, any site supplying Tesco may be subject to an unannounced ethical audit at any time, regardless of country risk rating.**
- Audits must be conducted on a semi-announced basis, at any point within a minimum 3 week window, excluding in Latin America where announced audits are accepted.
- Audits must be conducted when the site is fully operational and when the largest number of workers are present. If a site supplies more than one product to Tesco with different peaks, the audit window should align with the product with the largest worker numbers.
- For new sites, the audit must take place before supply. The audit does not need to be at peak production but there must be activity on site that is linked directly to the product that will be sourced. All critical or business critical issues must be resolved before commencing supply. Audits must be conducted by an audit body recognised by Tesco for ethical auditing in the relevant region. Details of these can be found in Policy 80045(a).

b) Additional Audit Requirements - Produce and Horticulture

- All sites (including all packhouses, approved growers and any other processing site along the supply chain) supplying into the Produce category **in high risk countries** require a SMETA audit on an annual basis. We also accept SIZA in South Africa, certifications (see 1.2 c below), and SA8000 in all regions excluding Latin America
- Audits must be conducted on a semi-announced basis (excluding South Africa and Latin America) when the site is fully operational and when the largest number of workers are present. If a site supplies more than one product to Tesco with different peaks, the audit window should align with the product with the largest worker numbers.
- Where harvesting or maintenance teams are used, they must be covered in the scope of the audit. If a central team is run from the packhouse, this should be covered under the packhouse audit. If a 3rd party team is used, this should be covered under the audit of the site utilising these services. The ETI base code should apply to all sub-contracted labour.
- For new sites, the audit must take place before supply. The audit does not need to be in peak season but there must be activity on site that is linked directly to the product that will be sourced. All critical or business critical issues must be resolved before commencing supply. In the case of SIZA, a valid certificate must have been issued.
- Any site that requires a SMETA audit must be registered on Sedex with a completed SAQ. Sites are required to update their SAQ annually, or when business changes occur.

- Any site that requires a SMETA audit must also link to Tesco UK Produce on Sedex via the relevant primary supplier. In South Africa, if a SIZA audit is being conducted, all growers must be registered on Sedex and linked via SIZA.
- Where an audit is not required in the following year, sites must remain linked to Tesco UK Produce on Sedex with an updated SAQ.
- If a grower is using certification as an alternative to SMETA, they do not need to be visible on Sedex.

There are a number of exceptions to the above, as detailed below:

i) Smallholders

Growers with less than 15 employed workers (permanent and temporary), per production unit are defined as smallholders. The ethical requirements for smallholders are based on the type of farm and workforce:

1. Family run growers with no employed workers require no formal ethical assessment.
2. Family run growers with no employed workers but using a central harvesting or maintenance team run from the packhouse require no formal ethical assessment. The packhouse audit will cover the teams.
3. Family run growers with no employed workers but using a central harvesting or maintenance team that is not run from the packhouse are to be treated as per 4) at time of harvest.
4. Growers with less than 15 employed workers must be either:
 - Rainforest Alliance, Fairtrade or Fair for Life certified
 - GRASP risk assessed

Where GRASP is used, growers must be compliant with all control points. Primary suppliers should inform Tesco Responsible Sourcing where this is not the case in order to agree next steps and/or additional requirements.

If a risk is identified by a Responsible Sourcing Manager (RS), additional due diligence may be required, for example a sample of SMETA audits.

ii) Multi-site audits

A multi-site audit can be conducted for growers under a central management system. The central management system must be at grower level. All growers must be under the same ownership and governed by the same set of policies, employment contracts and procedures – see FAQ document for further information.

A multi-site audit should comprise of (1) a central management system audit and (2) an assessment of a sample of growers. The sample should be made up of 20% of the total number of sites owned by the company and should be selected by either the relevant RS Manager, Technical Manager or audit body. Where

non-conformances are identified, the follow-up actions should apply to all sites under the central management system. Growers should be rotated each year and any follow-up audits must be conducted in addition to the 20% sample.

iii) Certification

Fairtrade, Rainforest Alliance and Kenyan Flower Council audits are accepted as an alternative to SMETA. **This does not apply to primary sites**, as per TQC definition. We accept Fair for Life for smallholders only – see [Smallholders](#) section for guidance.

Any outstanding critical or business critical non-conformances from SMETA audits must be in verified status on Sedex before a move to certification is accepted. Growers should share certification audit reports with Tesco timeously.

The above does not apply to bananas from the Latin America which will continue to require SMETA audits conducted by SIPAS as well as Rainforest Alliance certification until further notice.

iv) Contingency and Spot purchases

Contingency sources are intended to be used for a temporary period of time (1 – 6 weeks) and do not feature on Tesco's approved grower list. Spot buying is a 'one-off' purchase from a contingency source without a further period of supply.

Sites in high risk countries that are used for a contingency or spot purchase must have one of the following:

- a) SMETA audit with any audit body in the last 2 years with no open critical or business critical non-conformances
- b) A valid SIZA certificate
- c) Rainforest Alliance or Fair Trade certification

If a contingency or spot purchase does not meet the above criteria, we will not accept the source. If the RS Manager exceptionally provides approval, it will be limited to one purchase order. If the same source is requested in year 2, full due diligence in line with our policy is required.

c) Additional Audit Requirements – Protein

- All end-to-end agriculture and seafood supply chain sites in high-risk countries require a SMETA audit on an annual basis. Including where relevant:
 - Feed mills
 - Hatcheries
 - Farms (including parent stock farms)
 - Slaughter houses

- Processing sites (including for wild fish)
- Eggs or dairy which are an ingredient are excluded from these requirements.
- For poultry and aquaculture supply chains, any workers in terminal hygiene teams or catching teams on site at the time of audit should be included within the scope of the farm audit.
- All audits must be conducted on a semi-announced basis and be completed by an approved audit body. You can find a list of our recognised and approved audit bodies on TQC policy number 80045(a).
- Audits must be conducted when the site is fully operational and when the largest number of workers are present. If a site supplies more than one product to Tesco with different peaks, the audit window should align with the product with the largest worker numbers.
- For new sites, the audit must take place before supply. The audit does not need to be in peak season but there must be activity on site that is linked directly to the product that will be sourced. All critical or business critical issues must be resolved before commencing supply.
- Any site that requires an audit must be registered on Sedex with a completed SAQ. Sites are required to update their SAQ annually, or when business changes occur.
- Sites must link to the relevant Tesco category via the relevant primary supplier – see FAQ document for further information. If an audit is not required in the following year, sites must still remain linked to Tesco.
- Tesco reserves the right to request additional due diligence or collaboration with relevant civil society organisations.

i) Fishing vessels

- All vessels are excluded from the requirements for a SMETA audit but all suppliers no matter the country risk rating are expected to complete the SEDEX Fishing Vessel Labour Practices Data Collection Questionnaire.
- Appropriate and continual due diligence must be undertaken and recorded for all sources of wild fish and seafood including vessels catching wild fish to supply aquaculture feed mills.
- All suppliers are recommended to use PAS 1550:2017 as part of exercising due diligence in establishing the legal origin of seafood products and marine ingredients.
- Wild fish and seafood supply chains must be fully mapped to fleet level at a minimum, but ideally to individual catching vessels, and include a list of fleets/vessels, landing locations, cutting sites and further processing sites.
- Where ratified, suppliers are required to ensure adherence to The International Labour Organization's work in fishing convention ILO 188.

ii) Sampling approach

- All primary sites (as per TQC) in high-risk countries require a SMETA audit on an annual basis.

- For different site types (hatcheries, feed mills, farms, slaughter or processing) beyond primary, a 20% sample can be taken of each type of site supplying Tesco. The minimum number of audits for each type of site is 1.
- Where there are both owned and contracted sites, the sample audited should include owned and contracted sites and the split should be representative of the proportion supplying Tesco. The sample should be selected by either the relevant Responsible Sourcing Manager or audit body.
- Where non-conformances are identified, the follow-up actions should apply to all sites under the central management system.
- Sites should be rotated each year and any follow-up audits must be conducted in addition to the 20% sample. Please refer to the FAQ document for further guidance.

d) Audit Reports and Corrective Actions

At the end of the audit a 'Corrective Action Plan Report (CAPR)' will be initiated by the auditor and discussed with the site/supplier representatives. This is a high level list of actions that need to be undertaken, the timescales for completion, and an indication of whether or not a follow-up visit is required to verify progress.

The audit body is required to upload the ethical audit report onto Sedex within a maximum of 28 days. It is the responsibility of the primary supplier to monitor this and ensure that full visibility rights are given to all stakeholders in their supply chain. We expect our primary suppliers to alert Tesco as soon as they become aware of any critical or business critical non-conformances in either their own operations or a site in the Tesco supply chain.

Critical or business critical non-conformances must be closed out within the time frame agreed with the auditor, including undertaking a follow-up audit if required. Any critical or business critical non-conformances identified during a pre-supply audit must be addressed before commencing supply and verified as soon as possible. It is the responsibility of the primary supplier to manage this process.

The only exceptions to the above are:

- Growers who produce seasonal crops, with the agreement of the relevant Responsible Sourcing Manager, critical non-conformances can be closed out either via desktop or in the next annual audit.
 - For SIPAS audits in Latin America, where the following process must be followed:
1. The site provides a written commitment (within 10 days) to the primary supplier and RS Manager which specifies that they will close out the issue in the time frame stipulated by the auditor. If an extension is needed exceptionally, this should be agreed with the RS Manager.

2. Once the issue has been resolved, the site must upload evidence of this to Sedex and change the Sedex status to 'auditor's review'. The site must notify SIPAS by email that evidence has been uploaded and request this is reviewed.
3. Providing the evidence is sufficient, SIPAS will change the status on Sedex to 'Pending Follow-up'. This does not mean the issue has been closed out but will provide a level of assurance for Tesco that progress has been made on site.
4. If further evidence is required it will be changed to 'Progress made' or if the evidence is insufficient it will be changed to 'Rejected'. If this happens, please revisit the steps above, reaching out to the relevant RS Manager for guidance where required.

If a site in Latin America receives a repeat critical or business critical non-conformance that requires a follow-up audit, a follow-up audit must be conducted within 90 days. This excludes non-conformances that can be closed via desktop. The above process should be monitored by the primary supplier.

Production/supply for Tesco may be suspended, delayed or ultimately cancelled if timely and satisfactory action or progress is not taken. Where suppliers propose delisting or suspending sites within our supply chain on ethical grounds, it is requested that the Tesco RS team are consulted.

Further information on SMETA audits can be found in the SMETA Guidance document.

e) Recognised Audit Bodies

We only recognise certain independent audit bodies and auditors to conduct ethical audits within our supply chain. This gives us the reassurance that the audit is of sufficiently high quality to identify non-compliances and verify remediation.

Please refer to document 80045(a) on TQC for the current list of recognised audit bodies and the regions for which they are recognised.

f) Reduced Audit Frequency

Sites can apply for a reduced audit frequency resulting in audits every 2 years if they meet the below criteria:

1. No critical or business critical non-conformances in the last 2 audits
2. Known, trusted, capable technical and ethical leadership
3. Strong, consistent performance history
4. Green/Blue scoring on TFMS audit and grade A BRC performance (primary sites only)

Suppliers would revert back to being audited as normal if any critical or business critical non-conformances are identified.

Sites must contact their relevant RS Manager to apply for and confirm reduced audit frequency.

Produce only:

Where a supplier has a group of growers (per product, per country) that have had no critical or business critical non-conformances in their previous annual audits, the supplier can apply for reduced audit frequency, resulting in a 50% reduction in the number of audits required in the next annual audit. The remaining 50% must be audited in Y2. Criteria 2 and 3 above would also apply to these suppliers.

Transform

The Transform pillar of our strategy focuses on addressing endemic issues such as forced labour, living wage, gender inequality and freedom of association through targeted programs in collaboration and partnership with our suppliers, NGO's and wider industry. We know that these issues cannot be addressed alone and that we need collective action to find and implement solutions.

Suppliers have a responsibility to conduct adequate due diligence on the sources they recommend to Tesco. In the event of a human rights violation, suppliers must work collaboratively to ensure that these are addressed and those affected receive redress.

Please refer to the [Country List](#) to identify programmes that we request suppliers engage with. We also have additional requirements for [Access to Remedy](#), [Responsible Recruitment](#) and [Accommodation](#) – see Appendix.

We expect Tesco Product Partners to have their own Responsible Sourcing strategies. The key Responsible Sourcing commitments from these should be captured within their Buy, Move, Sell plans. Progress on these commitments will be reviewed annually, at minimum, by the relevant Tesco Responsible Sourcing Manager and category.

Tesco are also founding members of the Food Network for Ethical Trade (FNET). FNET, comprising of a group of suppliers and retailers, aims to address human rights risks in global food supply chains through a common approach. We recommend our suppliers join this group, gaining access to a comprehensive risk assessment tool and topical working groups – see FAQ document for further information.

Advocate

We recognise that we can use our convening power to advocate for change where it is needed. We look to our suppliers as well as our broader stakeholders to help us identify where advocacy might be an appropriate channel to achieve the change needed. We also expect our suppliers to make us aware of any advocacy which may negatively affect human rights standards.

1. Roles and Responsibilities

Role	Responsibility
Supplier/Site	Suppliers and sites must read and implement the requirements, in addition to ensuring they are compliant with the ETI base code. Suppliers must inform Tesco of any of challenges associated with compliance as well as any Human Rights concerns or allegations against their organisation or supply chain.
Tesco Technical Manager	Responsible for ensuring all suppliers/sites have reviewed and understood the requirements outlined in the policy, including the closure of non-conformances.
Source Development Management	Support Technical Managers in ensuring all suppliers/sites have reviewed and understood the requirements outlined in the policy, including the closure of non-conformances.
Tesco Responsible Sourcing Manager	Provide clarification on the policy, where required, and support where there are challenges to compliance.
Tesco Responsible Sourcing Advisor	Issue periodic (internal) reports outlining compliance with the policy.

2. Glossary

Acronym	Definition
ETI	The Ethical Trading Initiative (ETI) is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.
Sedex	Supplier Ethical Data Exchange (Sedex) is a not-for-profit membership organisation for businesses committed to the continuous improvement of ethical performance within their supply chains.
SMETA	Sedex Members Ethical Trade Audit (SMETA) is one of the most widely used ethical audit formats. The concept describes a methodology based on the Ethical Trading Initiative (ETI) Base Code.

3. Associated Documents

Document No.	Document Title
80568	Human Rights requirements for food and grocery non-food suppliers - FAQ
60573	Responsible Recruitment requirements – Thailand and Malaysia
60519	Sourcing from areas of conflict – Guidance

4. Revision History

Date Effective	Version	Document Section	Change Summary
01/02/20	2	All	Annual review of policy, key changes include: <ul style="list-style-type: none"> • Reframing in the new pillars of our Human Rights strategy • Clarification of Protein requirements • Further detail on Remedy, Responsible Recruitment and Accommodation

5. Appendices

a) Certification Commitments

1. 100% Rainforest Alliance certified on bananas
2. 100% Rainforest Alliance certified on all chocolate confectionary (block, boxed, seasonal, mini-pack)
3. All cocoa in Tesco own-label products must be sourced from one of the following schemes: Rainforest Alliance, UTZ, Fairtrade or Cocoa Horizons
4. 100% RSPO certified palm oil in Tesco own-label products
5. 100% of our Tesco own-label wood and paper products to be FSC/PEFC certified by 2020
6. 100% of the South American soymeal used in animal feed to be certified to a Tesco-recognised certification scheme by 2020
7. 100% Rainforest Alliance certified on own-label black tea
8. All our own-label tea is sourced from the Ethical Tea Partnership
9. 100% Rainforest Alliance or Fairtrade certified on own-label coffee

b) Access to Remedy

Where a supplier is identified to have caused or contributed to a negative human rights impact, we expect them to actively engage in bringing about remediation, working alone or in cooperation with other actors.

To ensure possible grievances are addressed early and remediated appropriately, Tesco's expectation is that all suppliers establish or participate in effective operational-level grievance mechanisms.

Further guidance on remediation and grievance mechanisms can be found in the [guidance on the implementation of the UN Guiding Principles on Business and Human Rights](#).

c) Responsible Recruitment

Through membership of the Consumer Goods Forum, Tesco has made a commitment to embed the [Priority Industry Principles on Forced Labour](#) in its own operations and value chains. These include:

- Every worker should have freedom of movement
- No worker should pay for a job
- No worker should be indebted or coerced to work

We also endorse the Employer Pays Principle that, *no worker should pay for a job, the cost of recruitment should be borne not by the worker but by the employer*. In line with this, we have specific expectations around recruitment fees and costs as follows:

- We expect labour providers utilised by our supplies to meet the legal requirements within the country they operate as well as being compliant with the ETI base code. Suppliers should conduct annual audits of their providers to ensure policies and procedures meet these expectations. Audits should cover the activities of any sub-contractors.
- Suppliers shall seek to ensure that when they recruit directly and/or engage labour providers, recruitment fees and costs are paid by the supplier or agency and will prohibit any charges by suppliers, labour providers or other 3rd parties to prospective workers. This means you must pay enough to agents to cover the cost of recruitment including travel and any required documentation in both the home and host country. The [International Labour Organisation](#) provides a definition of recruitment fees and costs, suppliers should familiarise themselves with this, and incorporate it into their approach to ethical recruitment.
- We recognise that in some circumstances the transition to the Employer Pays model may require significant changes to recruitment practices and ways of working. Where such changes are required, suppliers must have a clear strategy to ensure ethical recruitment practices and the elimination of recruitment fees, supported by a time bound action plan. We strongly encourage suppliers to make use of the [Responsible Recruitment Toolkit](#) and their free training – see FAQ document for further information.
- Unlawful recruitment fees should be fully remediated. In cases where excessive recruitment fees are found to have been paid, suppliers should share with Tesco a proposal for remediation.
- Suppliers in Thailand and Malaysia should refer to the country specific requirements on Responsible Recruitment – policy 60573.

d) Accommodation

In all countries, we expect both on and off site worker accommodation to be legal, safe and fit for purpose. Where accommodation charges apply, these should be reasonable and in line with local legislation. Fees must not take workers below the minimum wage.

Suppliers and sites providing caravan accommodation in the UK must complete the self-help checklist within the [FPC Guidance on provision of caravan accommodation for temporary workers in the UK](#).

Growers providing accommodation in Spain are encouraged to utilise the [Accommodation Guide for Temporary Worker's](#) developed by the Spanish Ethical trade forums. This is in consultation until June 2020.

We welcome relevant suppliers' engagement with this consultation process - feedback should be sent to accommodations@conexionsocial.com.

In all other countries, suppliers must consider accommodation within their due diligence of their supply chains and sites. At a minimum, this should include a mapping exercise to understand where accommodation is provided, in what format (caravan, house etc.) and number of beds. From this suppliers should take a risk-based approach to conducting spot checks of accommodation; this can take the format of self-assessment by the second tier supplier or be covered by an audit e.g. SMETA. We do not expect suppliers to conduct audits of all sites that provide accommodation. The UK FPC guidance is a useful tool to understand what to look for during spot checks. We expect suppliers to update Tesco on key issues identified through accommodation due diligence, and their actions to address these.

e) Country List

The country risk assessment has been developed by the Food Network for Ethical Trade (FNET) - see FAQ document for further information.

Following UK Government advice, please note that regardless of supplier performance and external country risk ratings, product sourcing is strictly prohibited from the following regions:

- Golan Heights
- West Bank
- Gaza strip
- North Korea
- Russian-occupied territories
- Syria

Countries undergoing socio-political stress may require additional due diligence measures, at short notice. Please refer to the 60519 - Sourcing from Areas of Conflict guidance for further information.

Country	Risk rating	Audit required	Other requirements or equivalence
Afghanistan	91	✓	
Albania	50		
Algeria	83	✓	
Angola	76	✓	
Argentina	50		
Armenia	54		
Australia	50		
Austria	17		
Azerbaijan	84	✓	
Bahrain	86	✓	
Bangladesh	83	✓	

Barbados	33		
Belarus	83	✓	
Belgium	17		
Belize	54		
Benin	67	✓	
Bhutan	70	✓	
Bolivia	63		Make the RS Manager aware of any new sourcing plans.
Bosnia and Herzegovina	43		
Botswana	50		
Brazil	75	✓	
Bulgaria	34		
Burkina Faso	97	✓	
Burundi	98	✓	
Cambodia	83	✓	
Cameroon	81	✓	
Canada	50		
Cape Verde	70	✓	
Central African Republic	100	✓	
Chad	80	✓	
Chile	66		
China	84	✓	
Colombia	83	✓	
Comoros	85	✓	
Congo Republic	72	✓	
Costa Rica	50		- Pineapple and melon suppliers for whole head and ingredients must have an annual SMETA audit or be certified by one of our approved schemes. - Banana suppliers must have an annual SMETA audit and RFA certification.
Cote D'Ivoire	91	✓	
Croatia	34		
Cuba	85	✓	
Cyprus	34		
Czech Republic	34		
Democratic Republic of the Congo	94	✓	
Denmark	17		
Djibouti	89	✓	

Dominican Republic	67	✓	
Ecuador	50		Banana suppliers must have an annual SMETA audit and RFA certification.
Egypt	83	✓	
El Salvador	50		
Eritrea	100	✓	
Estonia	17		
Ethiopia	93	✓	
Fiji	83	✓	
Finland	17		
France	17		
Gabon	66		
Gambia	82	✓	
Georgia	67	✓	
Germany	17		
Ghana	74	✓	
Greece	83	✓	
Guadelope	40		
Guatemala	83	✓	
Guinea	97	✓	
Guinea-Bissau	95	✓	
Guyana	0		
Haiti	87	✓	
Honduras	67	✓	
Hong Kong	83	✓	
Hungary	50		
Iceland	17		
India	83	✓	
Indonesia	67	✓	
Iran	83	✓	
Iraq	100	✓	
Ireland	33		
Israel	50		Please ensure you read our '60519 - Sourcing from Areas of Conflict guidance' for information on regions where product sourcing is prohibited.
Italy	34		
Jamaica	53		

Japan	33		
		✓	- Make the RS Manager aware of any new sourcing plans. - Please ensure you read our '60519 - Sourcing from Areas of Conflict guidance' for information on regions where product sourcing is prohibited.
Jordan	67		
Kazakhstan	76	✓	
		✓	The Kenya Flower Council (KFC) scheme is also accepted, excluding primary sites as per TQC
Kenya	67		
Korea, Republic Of	17		
Kosovo	60		
Kuwait	67	✓	
Kyrgyzstan	62		
Laos	88	✓	
Latvia	33		
Lebanon	67	✓	
Lesotho	86	✓	
Liberia	94	✓	
Libya	100	✓	
Lithuania	34		
Luxembourg	10		
Madagascar	82	✓	
Malawi	92	✓	
		✓	All suppliers must adhere to the '60573 - Responsible Recruitment requirements - Thailand and Malaysia'.
Malaysia	83		
Mali	67	✓	
Malta	20		
Mauritania	83	✓	
Mauritius	34		
Mexico	67	✓	
Moldova	57		
Mongolia	49		
Montenegro	30		

		✓	- All berry growers need to complete the 'Moroccan Berry Growers Undertaking'. - Make RS aware if sourcing from Western Sahara. On country of origin labelling, we follow current Government guidelines.
Morocco	67		
Mozambique	96	✓	
Myanmar	72	✓	Make RS Manager aware if sourcing from Myanmar.
Namibia	68	✓	
Nepal	78	✓	
Netherlands	17		
New Zealand	33		
Nicaragua	67	✓	
Niger	100	✓	
Nigeria	83	✓	
Norway	17		
Oman	75	✓	
Pakistan	83	✓	
Panama	50		
Papua New Guinea	84	✓	
Paraguay	60		
Peru	67	✓	
Philippines	83	✓	
Poland	66		
Portugal	50		
Qatar	83	✓	
Romania	66		
Russia	78	✓	
Rwanda	87	✓	
Sao Tome and Principe	77	✓	
Saudi Arabia	90	✓	
Senegal	90	✓	
Serbia	35		
Seychelles	34		
Sierra Leone	96	✓	
Singapore	50		
Slovakia	19		
Slovenia	13		
Solomon Islands	84	✓	
Somalia	100	✓	

		✓	<p>The following due diligence is accepted:</p> <ul style="list-style-type: none"> - Biennial semi-announced SMETA audits - Announced SIZA audit, frequency determined by Siza - Wine and Agricultural Ethical Trading Association (WIETA) certification, 3 year frequency, excluding primary sites as per TQC. - Certification as per 1.2 c, excluding primary sites as per TQC. - We encourage a representative from agri-businesses to attend Stronger Together training.
South Africa	67		
South Sudan	100	✓	
			<ul style="list-style-type: none"> - Suppliers and growers must be represented in the Spanish Ethical Forums on an on-going basis. - Growers providing accommodation in Spain are encouraged to utilise the Accommodation Guide for Temporary Worker's
Spain	50		
Sri Lanka	50		
Sudan	100	✓	
Suriname	55		
Swaziland	83	✓	
Sweden	17		
Switzerland	33		
Taiwan	66		
Tajikistan	84	✓	
Tanzania	80	✓	
		✓	<ul style="list-style-type: none"> - All suppliers must adhere to the '60573 – Responsible Recruitment requirements – Thailand and Malaysia'. - Poultry suppliers must
Thailand	67		

			participate in the Thai poultry working group. - Seafood suppliers must participate in the Seafood Taskforce.
The FYR of Macedonia	43		
Timor-Leste	71	✓	
Togo	86	✓	
Trinidad and Tobago	67	✓	
Tunisia	67	✓	
Turkey	83	✓	Make RS Manager aware of any new sourcing plans.
Turkmenistan	96	✓	
Uganda	88	✓	
Ukraine	83	✓	
United Arab Emirates	83	✓	
United Kingdom	50		<ul style="list-style-type: none"> - An appropriate representative from all UK based suppliers must attend Stronger Together training. We expect secondary suppliers into Produce and Horticulture to also attend this training. - We also strongly encourage all UK based suppliers to require their labour providers to attend Stronger Together training. - Any company headquartered in the UK with an annual turnover of £36 million or more is legally required to publish a Modern Slavery statement. - Suppliers and sites providing caravan accommodation in the UK must complete the self-help checklist within the FPC Guidance on provision of caravan accommodation for

			<i>temporary workers in the UK.</i>
United States	66		
Uruguay	29		
Uzbekistan	97	✓	
Venezuela	65		
Vietnam	80	✓	
Yemen	85	✓	
Zambia	83	✓	
Zimbabwe	83	✓	Due diligence checks on business (no linkages to the UN Security Council Sanctions list, land and business ownership, initial risk assessment) to be conducted by RS Manager. A signed commitment to paying wages timeously and agreement to unannounced visits to verify wages must also be in place.

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