

Supplier Code of Ethics

Harvest Pet Products commit to the following:

Understanding and commitment

- ensure consistent understanding of business ethics across the organisation at all levels
- continually enhance knowledge of all relevant laws and regulations in the countries in which we operate, either directly or indirectly
- commit to eradicating unethical business practices including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour

Ethical practice

- conduct all business relationships with respect, honesty and integrity, and avoid causing harm to others as a result of business decisions
- treat all stakeholders fairly and impartially, without discrimination or favour
- actively support and promote corporate social responsibility (CSR)
- avoid any practices which might bring the business into disrepute.

Professionalism

- use procurement strategies to ensure there are no unethical practices in our supply chain
- ensure procurement decisions minimise any negative impact on human rights and the environment whilst endeavouring to maximise value and service levels
- put ethical policies and procedures in place, regularly monitored and updated, and ensure compliance
- mandate the education and training of all staff involved in sourcing, supplier selection and supplier management to professional standards
- practise due diligence in all business undertakings.

Accountability

- accept accountability and take ownership of business ethics
- foster a culture of leadership by example and team engagement
- take steps to prevent, report and remedy unethical practices
- provide a safe environment for the reporting of unethical practices.

Paul McCartin

Managing Director

August 2020

Guidance notes

Corporate ethics are a set of principles that guide the way your organisation conducts itself in its dealings with customers, suppliers, employees and regulators. By creating a set of established principles, an organisation is publicly declaring its intent to behave ethically and responsibly in its practices. By adopting the CIPS (Chartered institute of Purchasing and Supply) Corporate Code of Ethics an established guide which, will demonstrate impartiality, transparency, professionalism and accountability.

This guidance is designed to help interpret and implement the Code:

Understanding and commitment

All employees involved in sourcing and supplier management should be:

- aware of and understanding of the organisation's ethical code, and how it relates to procurement and supply management; this should form part of new staff induction and ongoing performance measurement objectives;
- given appropriate professional training and receive relevant and regular training on the impact of fraud and corruption within the supply chain;
- up to date with new local and international legislation relating to malpractice in business, including fraud and corruption, bribery and human rights abuse.

For more information on human rights abuse, please visit www.walkfreefoundation.org.

Ethical business practice

We can ensure our organisation is operating ethically by:

- aligning ethical behaviour between the procurement team and all those in the organisation who are involved in sourcing, supplier selection decisions and supplier relationship management;
- developing processes and procedures which clearly segregate duties and delegation of authority and ensure all staff understand and comply with their authority limits;
- creating a system for detecting any exceptions to delegated authority and addressing any anomalies;
- avoiding any practices which require payment or other commitments from suppliers in order to achieve preferred or approved supplier status;
- ensuring confidentiality between buyers and suppliers is safeguarded through Non-Disclosure Agreements and confidentiality clauses in all contracts; any third parties involved should also sign up to these agreements;
- reporting any illegal activity to the relevant authorities.

Sourcing suppliers

Honing our processes for sourcing suppliers forms part of the Code, and we should:

- understand the full supply chain beyond Tier 1 suppliers; know the countries of origin and ensure that at some stage in the supply chain there is some form of physical audit of the premises or sites where commodities, goods and services are being sourced;
- ensure suppliers have their own code of ethics and put in place a process for monitoring their compliance;
- carry our procurement tendering openly and transparently with clear evaluation criteria; avoid the use of discriminatory language or clauses in documentation
- ensure staff involved in sourcing and supplier selection decisions do not show favouritism or are unduly influenced by familiarity with suppliers;
- develop evaluation criteria which covers economic, social and environmental factors.

Tendering

In order to meet our tendering standards, we should:

- use prequalification questionnaires to ensure that tendering is carried out in an equitable manner, with opportunities for under-represented suppliers to bid and with no unfair barriers to entry;
- make specifications outcome-based wherever possible to encourage competition by increasing the opportunity to participate;
- communicate tenders widely and give sufficient time to allow suppliers to submit.

Corruption

Avoid accusations of corruption by:

- Putting in processes to allow procurement professionals to alert senior management to corrupt activity
- Being aware of, and eradicating, any corrupt activity from your supply chain, including bribery; extortion or solicitation; trading in influence; money laundering; and nepotism

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