



Spadel Sustainable Procurement Policy

Spadel's mission is to connect people and nature for a healthier life, today and tomorrow. That mission only holds true if it also applies to the people who help make it possible, and to the natural resources we all depend on, including across our supply chain. This Policy sets out our commitment to ethical, social and environmental standards, and what we ask every supplier, agent and subcontractor to uphold when working with us.

Shared values are the foundation of strong, lasting business relationships. We expect our suppliers to reflect these principles in their own practice, and to educate their employees, agents and subcontractors accordingly.

Our commitment to human rights

Spadel commits publicly to respecting human rights, in line with:

- the UN Guiding Principles on Business and Human Rights;
- the International Bill of Human Rights, including the Universal Declaration of Human Rights;
- the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

This commitment applies to our own workers, our suppliers' workers, and the communities where we source, and includes a commitment to regularly assess our impacts and remediate any harm we have caused or contributed to. It has been submitted for formal approval to Spadel's Executive Committee.

In 2026, Spadel assessed its human rights risks across its supply chain: mapping the scope and identifying risks through desk research. Of 105 potential impacts screened, 4 were confirmed as salient:

- Freedom from forced labour
- Right to favourable working conditions
- Right to social security
- Freedom from child labour

A summary is published on www.spadel.com and renewed at least every five years, informing how Spadel prioritises, prevents and addresses impacts throughout this Policy.

Working with our suppliers

This Policy sets non-negotiable minimum standards, applicable to Spadel and its suppliers alike, that we ask suppliers, their employees, agents and subcontractors to respect.

We encourage suppliers to align with internationally recognised standards on business conduct, human rights and the environment, and we support them in improving, verifying and demonstrating compliance, through self-assessment, cooperation in evaluations, and corrective action where needed.

We hold ourselves to the same standards we ask of our suppliers: we do not ask of them anything we are not willing to do ourselves.

Spadel reserves the right to terminate any agreement with a supplier that does not demonstrate genuine commitment to this Policy.

Speaking up

Spadel is committed to the highest standards of business ethics. Our whistleblowing policy enables stakeholders to report concerns about actual or suspected misconduct safely, without fear of retaliation; every report is treated seriously, investigated carefully, and addressed without delay.

Principle 1: Ethical commitment in conducting business

Spadel's relationships with business partners are built on honesty, integrity and fairness, in an open, competitive environment.

Compliance to law — Spadel and its suppliers comply with all applicable laws; where none exist, we act consistent with this Policy.

Improper advantage — Spadel never offers, promises or accepts improper advantages, directly or through intermediaries, to obtain or retain business.

Conflicts of interest — Spadel employees avoid conflicts between personal interests and the interests of the business.

Fair competition — Spadel competes lawfully and fairly, on the merits of its products and services.

Food fraud — Spadel complies with BRC Food Fraud Prevention requirements, including an annual Food Fraud Vulnerability Assessment and mitigation plan.

We expect suppliers to meet the same standards, through their own policies and procedures.

Principle 2: Environmental commitment

Spadel continuously works to minimise its environmental impact, aligning its policies with the highest standards of environmental protection and integrating them into its operations and training.

We seek fruitful cooperation with suppliers to share best practice and measure progress against common targets, with a similar emphasis on:

- **Energy** — measuring and reducing use in manufacturing and distribution.
- **Water** — measuring and reducing the use and discharge of water.
- **Waste** — measuring and reducing waste production.
- **CO2** — reducing the carbon footprint of products and services over their lifecycle.
- **Biodiversity** — measuring and reducing our impact on biodiversity.

Principle 3: Social commitment towards workers

Spadel is committed to a workplace built on trust, honesty and fair treatment, and expects its suppliers to commit to the same principles.

Child labour

Child labour is not allowed under any circumstances. Per ILO definitions, a child is anyone under 15 (or the higher age set by local schooling law). Limited exceptions may apply for ages 13–15 (or 12–14 for light work) where the work is safe and does not affect schooling or development.

Forced labour and modern slavery

All employment is voluntary. Forced, prison, indentured or bonded labour, and any other form of modern slavery, are not allowed.

Freedom of association

Workers have the right to join trade unions or other organisations of their choice, and to bargain collectively in accordance with local law.

Non-discrimination

Discrimination on the basis of race, religion, gender, sexual orientation, age, political opinion, or social or union membership is not permitted. Workers are evaluated solely on skills, abilities and performance in all employment decisions.

Wages and working hours

Wages and working hours reflect at least the applicable legal minimum norms. Every worker receives at least one day of rest during a seven-day working period, in accordance with local law.

Harassment

Workers shall not be subjected to physical, verbal, sexual or psychological harassment in the workplace.

Health and safety

Workers have a right to a safe and healthy workplace. Spadel maintains an extensive safety and health policy for anyone entering its sites, which is strictly enforced.

We expect suppliers to implement equally high standards, applying international norms where local regulation falls short, including:

- appropriate protective equipment for workers;
- safety procedures and hazard training;
- hazard and risk assessment for equipment and processes;
- accident monitoring and accurate record-keeping.

Approval by Executive Leadership

Reviewed by: Procurement and Sustainability departments | **Approved by:** Spadel's Executive Committee 30/09/2026 | **Submission date:** 30/09/2026 | **Next review:** annual, or earlier if standards, regulations, or risk assessment outcomes change.