

Whitbread Responsible Sourcing Policy Sugar

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1. Context

Whitbread recognises it has a responsibility to source with integrity and ensure sound social, ethical and environmental practices within its own operations, supply chain and in every market in which it operates. We are committed to ensuring that all our procurement practices are carried out in the most sustainable and responsible way possible and this includes the responsible procurement of all raw materials sourced to produce any product involved in the Whitbread business.

Whitbread understands the environmental impact sugar production can have on the global and local communities. We are aware of the water and soil demand and potential for pollution caused by mill processes and the subsequent health issues this can lead to in the surrounding community. Whitbread recognises not only our responsibility, but our potential as a significant consumer to positively influence this impact through ensuring sustainable and responsible sugar supply.

All Whitbread procurement is subject to compliance with the Whitbread Responsible Sourcing Policy which outlines that 'suppliers may in addition be required to comply with additional sub-policies or standards relevant to the products that we source from that supplier and specific risks or issues associated.' Whitbread considers the procurement of sugar to be an area of such risk and has therefore created this policy document to sit alongside the Responsible Sourcing Policy.

2. Scope

Throughout this document, the term 'sugar' refers to sugar sourced for packets offered in our coffee shops or restaurants, used as a cooking ingredient or for sourced as an ingredient in a Whitbread product.

3. Policy Requirements

The Whitbread policy ensures that all products and materials stated above are sourced in compliance with the following sustainable agriculture principles:

3.1 Transparency

Whitbread requires honesty and transparency from all suppliers. In order to ensure sustainable sourcing throughout the supply chain, Whitbread encourage suppliers to map their sugar supply. We realise that the complex nature of global sugar supply chains makes securing 100% traceability down to individual farm level a challenge. We therefore require suppliers to provide evidence of traceability down to sugar mill level and encourage efforts to indentify where this can be driven further. All information relating to the supply chain and the environmental and

social impacts pertinent to Whitbread sourcing must be available for Whitbread's review upon request.

3.2 Legal compliance

Sourcing methods will operate in compliance with all applicable local, national and ratified international laws and regulations, including ILO conventions and suppliers must have the legal right to conduct activities on the area of land, water or coastal environment.

3.3 Traditional, civil & human rights and labour standards

Whitbread will not accept violations of traditional, civil and / or human rights or non-compliance with labour standards as set out in the Responsible Sourcing Policy and in line with the UN Guiding Principles for Business and Human Rights.

3.4 Community Engagement

Whitbread encourages suppliers to ensure there are open and effective lines of communication with key stakeholders in the local communities in which sourcing takes place. This communication should be known to the local community and used to inform the supplier on pertinent local issues relating to sugar production and also as a means for workers and farmers to report any issues or grievances to the Whitbread supplier. Community engagement will also be used to identify opportunities to provide local employment where possible.

3.5 Greenhouse gas emissions

Suppliers are encouraged to report to Whitbread and set time bound targets with the aim of continually working towards reducing greenhouse gas emissions from their primary production and processing plants, plantations, farms and mills.

3.6 Water management

Suppliers are encouraged to conduct a water resource requirement and consumption assessment. This should consider the impact of water use and discharge. The aim of such an assessment should be to identify opportunities to reduce water consumption and mitigate the risk of any negative impact on water quantity and quality. All waste water should be managed responsibly and in line with local legal requirements.

The following policy requirements are relevant to suppliers of sugar at primary production level. They define Whitbread's ambition in this area and Whitbread encourages its direct suppliers to work towards ensuring compliance throughout their own supply chains.

3.7 Protection and conservation of natural biodiversity and ecosystems

- Sourcing operations or production will not take place in areas deemed to be, to include, or be responsible for the maintenance of, high conservation value areas.
- Sourcing operations or production will not take place in areas where clearance of primary forests has taken place.

- The potential impact of sourcing operations on the existence and conservation of any threatened or endangered species will be identified and where relevant, the risk of negative impact will be mitigated.
- Sourcing operations will ensure that the local biodiversity, natural habitat and ecosystem functions in the local environment are protected at all times.
- Pollution will be minimised throughout the production process and production waste must be managed responsibly.

3.8 Soil Management

Recognising the difference in soil structure used for growing sugar cane and sugar beet, and as a matter of best practice, suppliers are encouraged to develop a Soil Management plan in order to protect soil from erosion and degradation as much as possible, maintaining the productivity and long-term viability of soil used in the production of sugar. This may involve the soil structure (e.g. availability of surface and ground water), organic matter content, nutrient status and microbiological health.

3.9 Chemical use

Agrochemicals will be used responsibly, will be target-focused and will not harm or endanger the environment or surrounding communities. The storage, handling and disposal of all hazardous materials and waste will be done responsibly and legally, minimising respective potential environmental impacts. Whitbread encourages the use of biological or mechanical alternatives to pesticides where possible. Pesticides listed under WHO 1A and 1B, the Stockholm and Rotterdam Conventions, Montreal Protocol and paraquat will not be used in the production of sugar.

4. Certification and Accreditation

Whitbread considers Bonsucro (formerly known as The Better Sugarcane Initiative - BSI) Fairtrade to be the most comprehensive and widely accepted association working towards assuring sustainable sourcing of sugar. Whitbread are therefore committed to giving preference to sugar sourced from Bonsucro or Fairtrade certified mills. Additionally, Whitbread supports Red Tractor farm assurance accreditation for sugar sourced in the UK.

More information on Bonsucro, Fairtrade and Red Tractor is available on the following links:

<http://www.bonsucro.com/>

<http://www.fairtrade.org.uk/>

<https://assurance.redtractor.org.uk/standards/search>

5. Principles of Implementation

As a form of good practice Whitbread keeps a record of all sugar suppliers and systematically monitors the performance of all suppliers of products covered by this policy through direct communication, desk based certification review and, where relevant, third party verification. We are committed to periodically reviewing this policy to ensure it is up to date, relevant and conducive to driving continuous improvement throughout our supply chain.

In order for suppliers to implement this policy, Whitbread requires them to:

- Communicate this policy throughout their own supply chain.
- Confirm in writing a willingness to comply with this policy.
- Demonstrate full traceability and legality of all sugar sources down to mill level at a minimum.
- Provide documentary evidence confirming third party certification where relevant.
- Ensure Whitbread representatives, including third party auditors are given uninhibited access to sites used to produce Whitbread goods and that all documentation is accurate and complete.
- Accurately and transparently communicate when these standards are not being met or are unlikely to be met and when support is required to meet these standards.

Signed:

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Title:

Date:

I declare that I have received and acknowledge in full Whitbread Plc's Sugar Policy and agree to work with Whitbread towards full compliance abiding by the Principles of Implementation.

On behalf of: *(Company name)*

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