Casual Dining Group Food Policy

Working on behalf of Bella Italia, Café rouge, Las Iguanas, La Tasca & Belgo

As a business serving thousands of guests each week who trust us to act responsibly on their behalf, Casual Dining Group (CDG) recognises that in all its operations, significant impacts can be made not just in economic terms but also in terms of social, environmental and ethical aspects.

Our food policy supports the assessment and evaluation of suppliers, products and services against criteria including food safety, supply chain assurance, product quality, environmental performance and ethical trading. These individual policy elements are set out in more detail below.

CDG recognises that in all its operations, not only do we have a responsibility to compliance with the law, but also we have a moral responsibility in having a sustainable business, which adds value to our relationships with suppliers, guests and employees.

We expect our direct suppliers to meet the criteria set out in this policy and we encourage and assist the adoption of best practice amongst all suppliers.

This policy will be reviewed on an annual basis.

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Supply Chain Assurance

Food Safety

CDG is committed to ensuring that all food is safe, of consistent quality and fit for purpose.

As a minimum, our food must be produced by approved suppliers with full compliance in all relevant UK and EU regulations and tested to agreed product specifications. In addition, suppliers are required to meet BRC accreditation or Global Food Safety Initiative (GFSI) certifications to a BRC Grade C or equivalent. Smaller suppliers should be active participants in the SALSA food safety certification standard or BRC Global Markets to enable them to demonstrate their due diligence on food safety operations whenever requested.

Where a supplier does not hold relevant certification, prior to supply a third party certification body will be required to provide a food safety audit of the above standard. Where the date of audit will not be until after supply is due, the supplier will cover the cost of a Casual Dining Group Product Quality audit to assess food safety standards prior to the start of product supply.

As part of CDG's due diligence Food safety surveillance audits based on risk assessments are independently carried out on suppliers on an annual basis.

All product submissions must be supported by a Product Data Sheet (PDS). The PDS is to be submitted for both bespoke and off the shelf products. Specifications need to be sent prior to product launch to ensure time for approval and are only subject to change with the express written permission of the Technical Manager. Suppliers are required to carry out annual review of the PDS for all products supplied to CDG.

Provenance and Authenticity

CDG requires all suppliers to have comprehensive traceability systems and be able to determine the provenance and authenticity of any product at any given time to ensure the quality, legality and safety of our food. This is to include the legally stated name and description of the product as sold to CDG.

These systems should include intelligence-led horizon scanning to identify potential risks to authenticity, origin and natural contaminants of the products.

Sustainable Sourcing

CDG recognises that by sourcing sustainably, we can ensure land use and social and environmental issues are managed responsibly. We can also ensure security of raw material supply for our business and reduce costs. We therefore believe there is a clear business case for doing this.

We require any supplier to source those key commodities whose production carries social and environmental risks, in a sustainable way and to demonstrate due diligence along the supply chain through independent third party verification and certification wherever possible.

We have identified seven key commodities, which are globally recognised as at a high risk of unsustainable sourcing from areas which have been deforested or at risk of deforestation. The CDG Responsible sourcing policy details these commodities and the requirements that must be complied with at all times.

Animal Welfare

CDG is committed to good animal welfare and all relevant suppliers in all countries are expected to comply with CDG's animal welfare policy (Appendix 1) that as a minimum requires legal compliance and support for the globally- recognised Farm Animal Welfare Five Freedoms:

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury and disease
- Freedom to express normal behaviour
- Freedom from fear and distress

In addition, this Policy covers all requirements for good aquaculture practices and farming welfare for fish and seafood. A copy of the animal welfare policy must be signed before supply of any animal or fish based products can be supplied.

Halal Production

CDG sources a small percentage of poultry, beef and lamb from suppliers that use halal methods in their processing plants. Products sourced from these processors must come from animals which are pre-stunned before slaughter in compliance with UK and EU animal welfare legislation and to source from farms that uphold the principles of the RSCPA's Five Freedoms that are applicable to each meat species in order to ensure the health and welfare of animals throughout our supply chain.

Ethical Trading

CDG expect all suppliers wherever they operate in the world, to conform to CDG's Ethical Sourcing Policy (Appendix 2) which covers fair terms of trading, protection of children, worker health and safety, equal opportunities, freedom of association, freedom of employment, hours of work and wages. CDG supports the principles of the Ethical Trading Initiative (ETI), an alliance of companies, non-governmental organisations (NGOs) and trade unions which promotes corporate codes of practice covering supply chain working conditions across the world.

The requirements of the ETI Base Code are incorporated into the CDG Ethical Sourcing Policy.

Product Integrity

Nutrition

CDG's approach to nutrition is based on a set of guidelines, targets and commitments to improve the nutritional value of our dishes whilst ensuring we never compromise on the quality and taste that our guests prefer. All food products require nutritional information to be supplied and all PDS sheets will contain full nutritional data by **analysis** unless exception is granted by the Technical Manager

Suppliers are required to review salt, saturated fat, total and added sugar levels in all their dishes and reduce these wherever possible without comprising food safety and quality.

CDG is a signatory to the Department of Health pledge F9: salt reduction (2017 targets) to provide a 15% reduction. Suppliers are required to work towards these targets and this will be achieved by:

- New product briefs to include a requirement to minimise salt content whilst maintaining flavour profile, food safety and shelf life criteria.

- Reducing salt content on individual items focusing on those that do not currently meet the 2012 targets e.g. pastry products, bloomer bread, sauces and ready meals.

Food innovation

CDG will continue to work with suppliers on menu development focusing on reducing the salt and sugar content of our dishes without compromising taste and exploring healthier options to give guests greater choice.

The use of ingredients such as potassium-based salt replacers and their benefits and risks is still under review by the UK Government and other health experts. CDG will continue to monitor this issue as well as work with suppliers to identify other ingredients such as stevia, a naturally sourced sugar substitute.

Children's Menus

During the development of our children's offer, we use the Children's Food Trust guidelines to help create a balanced and nutritious children's menu. In the year ahead, Casual Dining Group will focus on further improving the nutritional value of children's dishes focusing on keeping salt, added sugar and saturated fat to a minimum and stipulating the non-use of artificial additives including colours and flavourings.

We will also ensure that wherever possible, children's meals will include a portion of vegetables to support the 5 a day initiative.

In addition, a new Children's Product Development policy (Appendix 3) will be set in place to ensure that all criteria relating to nutritional content, product integrity and quality and marketing is adopted consistently by CDG's food development teams and relevant suppliers.

Allergy Management and Special Diets

Allergy management

All suppliers are required to provide allergy information on all products including assessment of allergy cross-contamination. In line with the Government Food Information Regulations EU1169/2011, CDG already provides allergy information on all food and drink on menus, websites and on request to CDG team members. All our team members in our restaurants are trained on how to prepare and serve food to allergy sufferers.

Current major allergens which require labelling as detailed by the FSA and EU legislation are:

- Cereals containing gluten (wheat, rye, barley, oats, spelt, kamut)
- Crustaceans
- Fish
- Eggs
- Peanuts
- Soya beans
- Milk
- Tree nuts (including almonds, hazelnuts, walnuts, cashew, brazil, pecan, pistachio, Queensland macadamia)
- Celery
- Mustard
- Sesame seeds
- Sulphur dioxide and sulphites at levels above 10mg/kg
- Lupin
- Molluscs

Vegetarian & Vegans

CDG will always ensure that vegetarian options are available on all menus and take all reasonable steps to maintain the vegetarian status of products during preparation and cooking. Products suitable for vegetarians must not contain any animal flesh or ingredients derived from the slaughter of animals. Similarly additives and processing aids from animal sources are not permitted in vegetarian products e.g. cochineal (E120) derived from insects and isinglass filtering agents in beer.

We do not actively develop dishes suitable for vegans however information on the suitability of specific dishes for vegans is available on our websites and on request in our restaurants.

Ingredients Low in gluten or Suitable for Coeliacs

CDG will respond positively to provide dishes suitable for guests with special dietary requirements. We acknowledge that the number of guests who are either diagnosed with coeliac disease or who choose to follow a gluten-free diet is on the increase.

CDG provides dishes that do not have gluten-containing ingredients however we cannot guarantee that our restaurants are gluten free sites due to current operations. We will continue to work on developing

gluten-free options and we are engaging with Coeliac UK to ensure that our approach is appropriate and relevant to those who have this dietary requirement.

Where ingredients or products are sold as low gluten or suitable for coeliacs to either CDG or their suppliers, CDG expects that the required controls are in place, regularly audited and are fully compliant with the Codex standard revised in November 2007 as Laid out by the Codex Alimentarius Commission.

Genetically Modified Foods

CDG does not permit the use of genetically modified ingredients, additives, flavourings or derivatives in any of our products. Suppliers must secure maize or soya from Identity-Preserved (IP) sources and demonstrate certified audit trails, verified systems and analysis to validate these sources.

GM in animal feed - CDG understands the prevalence of GM soya and maize in animal feed. In accordance with EU legislation, the use of GM animal feed in the supply chain does not require labelling.

Prohibited Ingredients and Additives

Ingredients

CDG prohibits the use of the following ingredients:

- Irradiated foods and ingredients *(unless the safety of this product is compromised without the use of this process and clear evidence can be shown to support this)*
- Mechanically recovered meat (MRM) for all meat and poultry products and desinewed meat for beef and lamb products in line with EU regulations
- Phosphates in poultry products - clarify
- Hydrogenated oils and fats in line with Department of Health's Responsibility Deal pledge F3a on the non-use of artificial trans fats

Additives

CDG is committed to removing food additives wherever possible whilst maintaining food safety, quality and consumer acceptability. The inclusion of additives is always challenged and where these are deemed to meet no specific need in the product, they must be removed.

CDG does not permit the following additives under any circumstances:

- Flavour enhancer: E621 Monosodium glutamate
- Colours: E102, E104, E110, E122, E124 & E129 Identified as 'The Southampton 6'

Sampling and Analysis

DNA Analysis

CDG will analyse materials for the presence of foreign DNA as a part of its due diligence and responsibilities to combat food fraud and adulteration. The products analysed will be based on a risk assessment and results will be available to the relevant suppliers.

Tests will be instructed by the Technical Manager and facilitated by SAI Global using an approved laboratory. Any new product/development item from new and current suppliers may also be subject to testing prior to launch at the expense of the supplier.

In the result of a test that shows the potential evidence of fraud, CDG will implement a product withdrawal and a full investigation should be undertaken. CDG will monitor the development of the food crime agency and reserves the right to share the results and investigation to that authority

Gluten Analysis

CDG requires that all products sold to the business as 'without gluten', 'free from gluten', 'low gluten' and any marketing term used to indicate the product is suitable for coeliac consumption shall be positive released based on results of gluten analysis.

Where positive release is not viable a testing schedule shall be agreed between CDG and the supplier. Suppliers should provide results of gluten analysis at least once per annum.

In the event of a test showing the limits have been exceeded CDG will implement a full product withdrawal as part of its responsibilities to protect its customer base.

Arsenic levels

CDG requires that all suppliers who use ingredients naturally high in Arsenic such as rice, monitor the levels and ensure that the they do not exceed the limits as laid out in Regulation (EU) No 1881/2006 as amended by Regulation (EU) 2015/1006.

As part of this CDG expects suppliers who use rice in the products supplied to analyse these to ensure the levels are within legal limits. Suppliers should provide results of this analysis at least once per annum and CDG will monitor its supply chain, in the event that a test shows limits have been exceeded, CDG will implement a full product withdrawal as part of its responsibilities to protect its customer base.

Microbial standards

All microbial testing and shelf life should be challenge tested and validated - see Appendix 1 for current standards.

Guest Communications

Responsible Marketing and Advertising

It is our policy that our menus are marketed in a responsible way and at a minimum are compliant with UK and EU regulations, mandatory codes and agreed voluntary codes of practice including Office of Communications (Ofcom) and Broadcast Committee of Advertising Practice (BCAP) rules for Responsible Advertising to Children.

CDG is specifically committed to ensuring that:

- Our marketing communications should not encourage inactive or unhealthy lifestyle.
- Our marketing activities should not encourage excessive consumption.
- Any health and nutrition claims will, at a minimum, meet regulatory requirements and will be science based or supported by sound expert advice.

Suppliers are also required to comply with the European Regulations 1924/2006 on nutrition and health claims made on foods as well as the Food Labelling Regulations 1996 which including claims and descriptors relating to the processing of an individual food product such as smoking, roasting, freshly baked etc.

Claims

Any product integrity claims including those relating to animal and worker welfare, provenance and nutrition must be supported by evidential information. All risks associated with this claim should be documented in a risk analysis matrix. Any subsequent changes to product specifications can only be made with the written approval of the Technical Manager.

Stakeholder Engagement

CDG acknowledges that to understand issues more fully and make better decisions, we need to talk regularly with our guests, team members, suppliers, Government, NGOs and other relevant organisations.

We have already started this process through working with the Food Standards Agency, Department of Health, Coeliac UK and the Vegetarian Society in the areas of food safety and nutrition and we will identify other stakeholders to support us in our policy development and Best in Class programme.

Appendix 1

Animal Welfare Policy

Casual Dining Group is committed to ensuring the highest standards of animal welfare and best industry practice in our supply chain. We will deliver this commitment by ensuring that relevant employees, suppliers and other key partners have a good working knowledge of animal welfare legislation, policies and practices.

Scope

Our animal welfare position statement focuses on beef, pork, lamb, poultry, dairy, fish and shell eggs and is applicable to all direct suppliers both in the UK and overseas.

We require suppliers to demonstrate management of animal welfare back to farms and at any given time be able to provide the relevant information on request.

Casual Dining Group Requirements

As a minimum, we require our suppliers to ensure that their farmers and producers comply with EU and UK animal welfare legislation including statutory livestock codes of practice: Animal Welfare Act, the Welfare of Farm Animals standards and EU Council Regulation and Directives relating to specific animal welfare standards for each species.

Our Animal Welfare Policy supports the 'Five Freedoms' principle proposed by the Farm Animal Welfare Council (FAWC) as outlined by Council Directive 98/58/EC on the protection of animals kept for farming purposes. The five freedoms are:

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury and disease
- Freedom to express normal behaviour
- Freedom from fear and distress

Casual Dining Group suppliers are also required to ensure that they source from farms which comply with the relevant farm assurance schemes that operate at a country, European and global level such as the UK Red Tractor standard or overseas equivalent such as Global Gap.

Abattoirs must also be independently audited to ensure that the highest standards of animal welfare are employed at time of slaughter. All animals are stunned prior to slaughter and abattoirs are required to comply with EU regulation 1099/2009 on the Welfare of Animals at the Time of Killing (England) (WATOK) brought into force in 2013. This includes any animals reared for halal production.

Casual Dining Group encourages all meat suppliers and their producers to progress towards higher welfare systems and ensure that they invest in continuous improvement of animal health and welfare standards.

Appendix 2

Ethical Sourcing Policy

Casual Dining Group recognises its responsibility to ensure sound social, ethical and environmental practices within its own operations and within its supply chain, in every market in which it operates. We acknowledge that every worker deserves the right to live and work with dignity.

This Policy defines Casual Dining Group's minimum standards and the basic principles of cooperation that we expect of all our suppliers and business partners. Suppliers may in addition be required to comply with addition sub-policies and standards relevant to the products that we source from that supplier and specific risks or issues associated.

We expect our suppliers to comply with all relevant national and local legislation

Where our minimum standards or benchmark industry standards exceed legal requirements, we expect suppliers to work towards becoming compliant with our requirements.

We recognise that local socio-economic and cultural constraints might apply to the implementation of this Policy.

We understand the need for reasonable timeframes for compliance and acknowledge that forcing immediate compliance might result in a more detrimental overall situation for workers. Where such complexities exist, Casual Dining Group expects suppliers to work with us and/or other stakeholders to develop the most appropriate response to improve social, ethical and environmental practices.

In additional to its basis in relevant local and national legislation, this Policy is drawn from:

- The Proceeds of Crime Act, 2002
- The Foreign Corrupt Practices Act, 1977
- The Data Protection Act, 1998
- The International Labour Organisation (ILO)
- The United Nations (UN) Universal Declaration of Human Rights
- The Ethical Trading Initiative (ETI) whose Base Code is drawn from the scope and standards defined by the ILO and UN.
- The International Organisation for Standardisation (ISO)

Where there is non-compliance with the minimum requirements laid out in this Policy, we will require suppliers to develop and share plans with us to mitigate non-compliance including completion dates. We reserve the right to cease trading if compliance is not achieved or if we observe serious material or deliberate non-compliance.

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2. Principles of Co-operation

Casual Dining Group understands that improving social, ethical and environmental standards in the supply chain is a challenging process requiring the efforts of its employees, suppliers and other stakeholders.

To drive continuous improvement, we will:

- Work to fair, transparent and mutually agreed terms and conditions
- Make payments for services provided in full and on time.
- Work collaboratively with suppliers to improve social, ethical and environmental standards where our support is needed and appropriate.
- Acknowledge specific national, regional or cultural challenges.
- Protect the confidentiality of information entrusted to us.
- Recognise suppliers' own standards where they are comparable to our own.
- Ensure that all relevant employees are aware of the Ethical Sourcing Policy.
- Act as an advocate for ethical sourcing within our industry.
- Seek to achieve improvements in supplier performance in this area.
- Include transparent social, ethical and environmental performance criteria in our supplier selection processes.
- Cease trading with suppliers demonstrating persistent disregard for this Policy.
- Give appropriate consideration to the impact of ceasing trading on suppliers.

We are committed to 14 social, ethical and environmental principles within our supply chain:

1. Employment must be freely chosen.
2. Freedom of association must be respected.
3. Working conditions must be safe and hygienic.
4. Child labour must not be used.
5. Fair wages must be paid.
6. Working hours must not be excessive.
7. Discrimination must not be practised.
8. Regular employment must be provided.
9. Harsh or inhumane treatment must not be permitted.
10. Conditions of dormitories must be acceptable to health and safety standards.
11. The rights of home-workers and migrant workers must be respected.
12. Business must be conducted lawfully and to a high ethical standard.
13. As appropriate to the product supplied, suppliers must ensure high standards of animal welfare, health and husbandry.
14. Environmental stewardship and responsible management must be practised.

3. Casual Dining Group Policy Requirements

3.1 Employment

1. There is no forced, bonded, indentured or involuntary prison labour.

2. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.

3. There is no slavery or human trafficking in any part of the supply chain at any time.

3.2 Freedom of Association

4. Workers, without distinction, have the right to join or form trade unions or other comparable, legal organisations of their own choosing and to collectively make representations to, or enter into negotiations over employment issues with their employer.

5. The employer adopts an open attitude towards the activities of worker organisations and their activities.

6. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

7. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3.3. Working Conditions

8. A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry, any specific hazards and legal requirements in line with internationally recognised certification and standards (such as the Occupational Health and Safety Assessment OHSAS 18001 or the International Labour Office ILO-OSH 2001 system).

9. A record of health and safety incidents (accidents and injuries) shall be maintained, with an action plan to improve performance by minimising the causes of hazards in the working environment.

10. Workers receive regular, recorded health and safety training.

11. Access is provided to clean toilet facilities, potable water and sanitary food storage.

12. Responsibility for health and safety is assigned to a senior management representative.

3.4 Child Labour

13. Suppliers may not employ workers under the age of 15 (14 in certain developing countries as designated by ILO conventions) except on a seasonal or part-time basis.

14. Suppliers must maintain formal documentation that verifies the age of each worker.

15. Suppliers must comply with all relevant child labour laws.

16. Suppliers shall contribute to programmes that provide for the transition of child labour to education or support Casual Dining Group's efforts to do so.

17. Young persons under 18 shall not be employed at night or in hazardous conditions.

3.5. Fair Wages

18. Wages and all legally mandated benefits paid for regular hours of work meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.

19. Overtime must be paid at a premium rate, at a minimum compliant with national legislation.

20. Wages shall be paid directly to the workers in the form of cash or cheques or into a nominated bank account, at the agreed intervals and in full.

21. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

22. No deductions from wages (other than those prescribed by law) may be made without the expressed permission of the worker concerned.

3.6 Working Hours and Annual Leave

23. Working hours must comply with national laws and industry standards.

24. Workers shall not be required to work in excess of a basic 48 hours per week. Overtime must be voluntary, must not average more than 12 hours per week and must not be demanded on a regular basis.

25. If under exceptional circumstances, an overtime of over 12 hours is required, this should be recorded and reported by the supplier.

26. Workers may refuse to work overtime without any disciplinary action being taken against them.

27. Reasonable annual leave must be afforded to each employee based on a clear formal policy.

3.7 Discrimination

28. Suppliers will fully comply with local laws regarding equality of employment opportunities.

29. Subject only to local law, suppliers will practise no discrimination in hiring, compensation, training, promotion, termination or retirement based on race, caste, nationality, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

30. If the supplier feels that structural discrimination exists that is beyond its ability to control then this should be recorded and reported to Casual Dining Group. A collaborative approach will be taken to resolve the issue in a manner that is sensitive to the cultural and social context.

3.8 Regular Employment

31. Work performed must be on the basis of a recognised employment relationship established through national law and practice.

32. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting or home working arrangements, or through apprenticeship schemes.

33. Migrant, contract, part-time and home-workers must receive the same rights, benefits and opportunities for advancement as other workers performing similar activities.

3.9 Humane Treatment

34. Physical and verbal abuse, the threat of physical abuse, sexual harassment or other forms of intimidation shall be prohibited.

35. Disciplinary actions must be fair, proportionate and fully compliant with local laws.

36. All disciplinary actions must be recorded.

37. Suppliers will record any incidence of harsh or inhumane treatment and develop action plans to prevent future violations.

38. Suppliers will develop a whistle-blowing policy and process for its workers.

3.10 Dormitories

39. Dormitory facilities must meet all local laws and regulations covering health and safety, sanitation, electrical, mechanical and structural safety.

40. An evacuation plan must be prominently displayed.

41. Dormitory facilities should have been designed and built for human habitation.

42. Facilities should be away from main factory and production buildings.

43. Charges for rent and food must be reasonable and benchmarked against local cost and wage levels.

44. Each worker must be provided with an individual sleeping area (bed or mat).

45. Sleeping quarters must be segregated by gender.

46. Workers must be provided with adequate and lockable storage space.

47. Sleeping quarters must have adequate lighting.

48. Appropriate quarters must be provided for couples who are legally married.

49. The living space per worker must be the minimum legal requirement or the local industry standards, whichever is the greater.

50. Workers must be allowed to leave and enter freely during time off work subject to reasonable restriction imposed based on safety considerations.

51. Dormitory accommodation must include access to potable water.

52. Workers must be provided with adequate recreational facilities.

53. Adequate toilet and shower facilities must be provided, segregated by gender and maintained in hygienic condition.

3.11 Animal Welfare

54. As appropriate to the product supplied, suppliers must be able to demonstrate that they operate high standards of animal health, welfare and husbandry, both for animals reared for food and in other circumstances, where animals may be used within the supply chain e.g. for work and transportation.

Note: Food suppliers should refer to Casual Dining Group's supplementary Animal Welfare Policy for further details of requirements specific to their operations.

3.12 Ethics

55. All relevant national and international legal requirements must be complied with.

56. Casual Dining Group must be informed of any serious breaches of compliance or investigations by authorities into potential breaches.

57. Suppliers must prevent:

- Money laundering
- Insider trading
- Fraud, bribery and corruption and other improper payments or gifts
- Unauthorised access to personal and business information

3.13 Environmental Stewardship

58. Suppliers must comply with all relevant local, national and international legal requirements regarding environmental stewardship.

59. As appropriate to the size and complexity of the business, suppliers must be able to demonstrate environmental practices, policies and management systems sufficient to ensure continuous improvement in environmental performance, including

- Awareness of potential environmental risks inherent in business operations
- Documented environmental policies
- Ability to monitor performance
- Ability to mitigate and minimise environmental risks and impacts

60. Suppliers should seek to:

- Minimise the use of water, energy and raw materials
- Minimise waste

- Minimise contamination of the local environment
- Maximise the use of recyclable and renewable materials
- Dispose of waste in a safe and environmentally responsible way
- Ensure that emissions, air, noise and odour pollution are within locally or nationally defined limits.

4 Policy Implementation

4.1 Casual Dining Group's Commitment to Social, Ethical and Environmental Standards

Casual Dining Group is committed to the principles of ethical sourcing and undertakes to:

- Engage its management team and employees.
- Provide appropriate training on this Policy to all key employees (e.g. buyers)
- Communicate this policy to all Tier 1 suppliers and make it publicly available.
- Undertake a supply chain risk assessment to identify and prioritise suppliers and products with higher social, ethical and environmental risk across all purchasing categories.
- Commence active supplier engagement in higher risk areas to understand their compliance status and issues that will act as a barrier to mitigation and to promote and support their compliance with this Policy.
- Develop and communicate to our employees, our suppliers and within our public reporting, our strategy for future development and monitoring of supplier compliance with this Policy.
- Review and revise this Policy on an annual basis.
- Report on progress in improving social, ethical and environmental standards both internally and externally.

Casual Dining Group reserves the right of access to supplier operations for our own auditors or by third party auditors engaged by Casual Dining Group in order to assess compliance with this Policy.

4.2 Acceptance of Code - Supplier Requirements

Suppliers shall commit to comply with this Policy and to:

- Communicate to all employees, suppliers, sub-contractors, home workers and temporary and contract staff engaged in their supply chain.
- Comply with all applicable laws in the countries in which they operate and all relevant ILO conventions. Where standards differ, the standard which offers the greater degree of protection to workers will apply.
- Establish management systems for delivering compliance with this Policy.
- Maintain records demonstrating compliance. An individual in a senior management position should be given responsibility for Policy compliance.
- Train relevant staff on social, ethical and environmental and human rights standards.

- Allow Casual Dining Group employees and representatives access to documentation, management and workers to determine progress against these standards.
- Report any serious breaches of this Policy to the relevant Casual Dining Group buyer or other such nominated Casual Dining Group representative.

Appendix 3

Children Product Development Policy

All relevant food suppliers are required to comply with this policy in addition to the CDG food policy when developing specifically items for children's menus.

Nutritional content

Below are stipulated the key nutritional values that are required for all products to comply with. The standards are built using recommended typical values for children aged between 7-11 years old.

Nutrient	***Recommended standards***
Energy	< 600 calories (per main meal)
Salt	Max 0.6g salt (per complete main meal)
Total Fat	<21g/ portion (per main meal, dessert or part meal)
Saturated Fat	<6g/portion (per complete main meal)
Total Sugars	Savoury Dishes <5g/100g Desserts <27g/portion

Ingredients

Added sugars

Suppliers will highlight added sugar content to differentiate between this and intrinsic naturally occurring sugars.

Additives

No artificial colours, flavours, sweeteners or salt replacers to be used.

5 a Day

Whole meal developed products (served as sold) it must contain 1 portion (80g) of fruit and/or vegetables.

Fibre

When providing samples of product ensure one uses wholegrains and pulses where possible

Fish

When providing samples using fish provide an option that uses oily fish.