Food Supplier Charter

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INTRODUCTION

Shared Good Times

Marston's is a leading local pub company, employing around 10,000 people across a diverse community-based estate of more than 1,300 pubs, bars and inns, with a culture that places guests at the heart of what we do. Our Purpose is to bring people together for Shared Good Times. This is underpinned by a clear strategy to create a high-margin, highly cash-generative local pub company based on differentiated formats and a brand portfolio that is naturally balanced to appeal to a range of consumers.

Our strategy is centered around five key value drivers, enabling us to deliver on our long-term target of becoming the UK's leading local pub company. These value drivers will leverage the strength of our market leading pub operating model, increasing revenue and driving efficiencies, whilst building the basis of a reliable growth company

KEY VALUE DRIVERS

1	Execute a Market Leading Pub Operating Model
2	Capex to Create Differentiated Pub Formats
3	Digital Transformation
4	Expansion of Managed & Partnership Models
5	Leveraging Marston's synergies in Targeted Acquisitions

Our strategy and business model are underpinned by three core enablers which support and help drive our strategic priorities and reflect Marston's unique culture and how we operate responsibly and ethically:

Powerful supplier partnerships > Performance driven teams > Safely and sustainably operating the business

Guests visiting our pubs are looking for great experiences, which are formed from the foundation of strong standards. Consistent delivery of our key drivers, alongside product quality and speed of service are critical to Marston's. Without delivering on these, great experiences simply cannot be served.

When these key drivers are delivered by our teams, we see the rewards through making our guests feel welcome, relaxed, and as though they are in a home from home. As our supplier, you and your products are critical to us in delivering our strategy and making Marston's the UK's leading local pub company.

Marston's has built a proud reputation for providing quality products at competitive prices to our guests. We strive to build a loyal, innovative, and trusted supply base, through nurturing partnerships with suppliers who share our values and maintain high standards and ethical business practices.

Marston's Food Supplier Charter

The Marston's Food Supplier Charter ("Charter") forms and integral part of the trading terms and contractual agreement between Marston's and our suppliers. This document sets out the sourcing policies, pre-requisite standards, conditions of supply, and product requirements that all suppliers and their products must comply with at all times. The Charter is relevant to all our potential suppliers, be they manufacturers, wholesalers, importers, traders, or agents. It applies to finished products and the ingredients used within each of those products.

Companies are increasingly being scrutinised by consumers and regulators on the environmental and human rights impacts of their operations and supply chain. Marston's is no different in wanting to ensure we meet those expectations and legal requirements. Our procedures include:

- Our Equality, Diversity & Inclusion Policy extending to our suppliers and promotes supplier diversity, inclusive procurement, and a safe and inclusive work environment. Our policy reinforces our commitment to equality, diversity, and inclusion, and to having a truly representative workforce where every member of our team, every guest and every supplier feels respected, valued, and able to be their best.
- We use an independent audit provider to complete risk-based audits on our supply base so that we can ensure the products we serve to our guests are safe, legal and comply with the standards covered in this Charter.
- All details from our food suppliers must be updated every three years, or as required if there is a change in the information held on the product information database. This may be an approved change in recipe, raw material, or any personnel changes and contact details. Product information is captured on Smart Supplier. We may ask suppliers to review specific sections of information (e.g., personnel details) throughout the year and may request additional information as regulatory frameworks change.

PROCESS OF ENGAGEMENT & SUPPLY

Initial Engagement

All suppliers must obtain approval from Marston's Technical team before commencing supply to us. During initial discussions, new suppliers will be asked to confirm their compliance with our Food Supplier Charter and conditions of supply. Suppliers, including agents and brokers, must also provide a copy of their current BRC, or equivalent, certificate and report. This documentation must be shared for the point of product manufacture.

Innovation

Suppliers are expected to contribute to an active innovation programme that supports a pipeline for future growth. We encourage working confidentially to the mutual benefit of both Marston's and the contributing supplier to ensure that Intellectual Property ("IP") is protected at all times.

For the avoidance of doubt, any unique ideas or innovations generated as a result of discussions between us and the Supplier, shall remain the property of Marston's. We would expect exclusivity agreements for an agreed period of time on ideas or innovations that a supplier brings to Marston's before they can exploit the idea elsewhere. This is mutually beneficial to us for growing our businesses together.

Suppliers are encouraged to bring new innovative products to Marston's at the earliest opportunity, through discussions with the New Product Development ("NPD") Manager.

Any product names presented to us should be compliant with all food labelling regulations from the point of first product presentation. See Trademarking of Product Brands in the Product Specification section on page 16.

New Product Development

As outlined above, we encourage all suppliers to present new and innovative products to Marston's' at the earliest opportunity. This can be done by engaging with our NPD Manger or a member of the Senior Food member. Each of our pub formats typically features one or two core menus per year, supported by seasonal specials and limited time offers.

The initial briefing stage to Marston's will be completed manually and outside of Smart Supplier. Marston's will provide a document for suppliers to complete all relevant information including Quality Attribute Sheet (QAS) fields. If successful, a NPD specification request will then be sent through Smart Supplier - this will enable the product to be progressed further through the process, though it is not a guaranteed listing at this stage. If any samples are required, they will be requested directly from the NPD Manager or a member of the Senior Food Team. Once a product is approved in the NPD phase, full specification will be requested by us, which will then be progressed through to full technical approval ready for launch. The NPD brief will detail conditions that we require products to comply with. Non-compliance may result in products not being shortlisted.

Marston's requires all suppliers to fully consider all the ingredients in NPD proposals. Any non-essential ingredients should be removed before proposals are submitted. To maximize the freedom of choice given to its guests, Marston's' preference is to exclude allergens or additives when they do not add anything of benefit to the final product. Suppliers must also ensure that proposals do not contain any of the ingredients this Charter does not permit i.e., MSG, Southampton Six Colours, hydrogenated vegetable oils. Further details can be found in Sourcing Policies on page 11.

All brief submissions are required to meet PHE sugar, calorie, and salt targets, providing it will not be detrimental to the quality of the final product, e.g., a naturally high sugar product, such as chocolate brownie.

Smart Supplier

Marston's is required to provide allergen information for any food or drink item it sells at the point of purchase if asked by a guest (EU Provision of Food Information to Consumers' Regulation No.1169/2011). We use Smart Supplier to collate and manage this information from all our suppliers. Smart Supplier has been independently reviewed and is primary authority assured, providing a high degree of due diligence in relation to the allergen information.

Smart Supplier connects suppliers with our business users, enabling them to manage the supplier product lifecycle. The platform supports the business process from the NPD stage and flows all the way to where a product is fully approved for listing. We will deem the appropriate stage that a product enters the process, but all products which require panelling will need to go through the NPD process. The number of attributes that need to be provided at NPD stage are limited and full details are provided within the Policy Documents section of Smart Supplier.

All suppliers shall have an account created on Smart Supplier by Food Alert. Once connected to our account, the supplier shall have a 'pending' supplier approval status. After the supplier is set up, they will have access to the system 'User Guides' found in the Policy Documents section, within Smart Supplier. The supplier shall be responsible for completing all Company details, certifications, sites, users, Self-Assessment Questionnaire ("SAQ"), found in Appendix 1 of this Charter, and accept Marston's Policy Document (this Charter).

The supplier is then responsible for adding any additional users to the system and keeping it updated with the latest information. This is important to ensure that we can stay connected all our suppliers.

Once the new supplier has been connected to the Marston's account, the risk rating will become visible. This risk rating will update once the supplier has completed the Certifications and SAQ and has accepted this Charter. In addition, the risk rating is impacted by areas such as third-party accreditation, specification accuracy, audit, and complaints. Marston's Technical Team will review the information supplied and, based on the information provided, either approve or reject the supplier. A discretionary modifier can be applied to the risk rating where the supplier falls short of our requirements but may be working towards achieving them. Marston's Technical Team will use the risk assessment outcomes to advise our Procurement and Food Teams as to whether they should consider using the supplier.

Food Safety Policy

Our policy requires products to be cooked or reheated to a core temperature of 75°C. There are exceptions for some products such as carvery meats where a slow and low cooking method is used. It is also our policy to date code products with day of opening (prepped and cooked - plus 48 hours, defrost plus 3 days), or where applicable, manufacturer's label. This can be discussed further with a Senior Food team member regarding specific products.

Product Listing

When a supplier receives a new line listing, a pre-production trial must be completed. Once pre-production has been completed, Marston's will require a case from this production run to be sent into our Head office, so the Senior Food team can check the product against the Quality Attribute Standards ("QAS") points. Only full production can begin once a product has been signed off by a Marston's Senior Food team member (supported by the Technical team). At the pre-production stage, a QAS should be completed, referencing information given on the sample submission documentation. This document then acts as the agreement between Marston's and the supplier on the quality parameters of the product throughout supply. Our Technical team conduct regular quality sampling of its products against these QAS, to ensure live products remain true to what was originally agreed. Any non-compliance will be communicated directly to the supplier. Any draft QAS details on Smart Supplier must be updated by the supplier after the pre-production trial. Once first/full production has been planned in, the supplier must notify us of those dates in advance, and at least one member of the team will attend. If no one from Marston's is free to attend then

we will require a case from this production run to be sent into our Head Office, so the food team can conduct final checks before the stock is released to A F Blakemore, Marston's third party logistics food partner. Marston's reserves the right to reject liability for any full production stock that does not meet our approval as defined in the pre-QAS and/or finalised QAS metrics.

Business Continuity

All our suppliers may be required to provide evidence of their ongoing supply chain risk management and their commitment to the continuity of supply. This may include business continuity plans, disaster recovery plans or other available evidence or documentation.

In certain cases, suppliers deemed business critical will be subject to a Business Continuity audit conducted by our Internal Audit team at no cost to the supplier.

Product Quality "Pride in Plate"

In our mission to create shared good times for our guests, we cannot underplay the importance of consistent service and product quality. All our teams play a key role in delivering this to our guests through perfectly served and presented dishes. However, we also put our faith in our suppliers to ensure the ongoing quality and consistency of the products they are producing and that we stock within our pubs and bars.

Value of experience is a key factor for guests when selecting where to eat and drink out of home. We know that the quality of our food and service speed directly correlate to overall satisfaction amongst our guests and their desire to return to our pubs. Pride in Plate is the overarching programme acting to raise performance in these areas - thus reducing complaints and refunds while increasing frequency of visits.

There are three parts to Pride in Plate:

Our primary aim is to ensure we have confidence in the products going into our businesses, alleviating pub complaints and enabling our teams to focus on amazing execution. This is achieved by working in partnership with suppliers that meet the high standards set out in this Charter, and through developing best-in-class products which are then monitored through our auditing processes.

As part of our supply base, all our suppliers are critical to the success of Pride in Plate. Further information about our format channels and product development plans will come from our Senior Food team through NPD briefs.

NEW SUPPLIER APPROVAL

New Supplier Approval

As set out earlier in this Charter, before any supplier can supply to Marston's, they must be approved by our Technical Team, which will involve completion of the SAQ on Smart Supplier and agreement to work to the standards in this document.

Arrangements will be made to complete an audit of any new manufacturing site at which the product is going to be manufactured.

No supplier agreement, contract, document, letter, or any other attachment to an e-mail should be taken as a legally binding commitment by Marston's, unless it has been approved in writing by Marston's Technical and/or Legal team. All Suppliers must keep supply agreements and arrangements with Marston's confidential, including but not limited to, pricing and terms. Such confidential information will not be released to any third party without the prior written consent of Marston's.

Pre-requisite Standards for Food Suppliers

The minimum requirements for supply are detailed below:

- Certification to Global Food Safety Initiative (GFSI) Standard e.g., BRC Grade A / IFS Higher / ISO 22002-1:2009 – all of which include the requirement for a HACCP (Hazard Analysis Critical Control Point) based food safety system.
  Where certification does not achieve a BRC Grade A, Marston's Technical Team should be notified so that practical steps can be taken to mitigate risk to the business and in some cases may mean supply is not possible.
- Where possible, provide site/branch information address for ingredients contained within the product i.e., grapes/vineyard information.
- Importers and traders – suppliers acting on behalf of manufacturers not under their direct control must ensure that the production sites conform to GFSI Standard and provide supporting evidence. Again, BRC Grade A or higher is expected of the manufacturers supplying the importers and traders and Marston's reserves the right to audit manufacturing sites used by importers and traders.
- Suppliers must notify us of any change in certification grade below the BRC Grade A standard.
- Suppliers must give Marston's advance notice of any change in production address/facility. No less than 8 weeks' notice should be provided to enable panelling of products made at the new manufacturing site, any stock build to be undertaken and also for audit to be completed.
- In exceptional circumstances by prior agreement, certification to BRC Start or Safe & Local Suppliers Association (SALSA) for small, regional suppliers is acceptable. This also has a HACCP requirement.
- Conformance to the Marston's Food Supplier Charter will be acknowledged via Smart Supplier.
- Marston's expect all our suppliers to follow the Corporate Code of Ethics published by CIPS (Chartered Institute of Procurement & Supply). The code sets out the values, business culture and practices which all organisations can adopt. The code requires a commitment to the eradication of unethical business practices, including bribery, fraud, corruption, money laundering and human rights abuses, such as modern slavery and child labour.
- Suppliers must be fully compliant with all relevant food legislation e.g., food additives, novel food, food labelling, food flavours and colours.
- An annual schedule of DNA testing must be provided for horsemeat in all meat and minced meat products and independent analytical results confirming its absence. Marston's reserves the right to request DNA tests of protein from other livestock.
- Where applicable, animal welfare policies and evidence of compliance throughout the supplier's supply chain must be provided.
- Suppliers must be able to provide evidence supporting menu claims such as provenance, sustainability, Fairtrade, vegetarian, vegan, nutrition, health, and allergen data.
- Suppliers agree to have their production sites audited for food safety before being approved to supply Marston's. We reserve the right to carry out periodic, unannounced visits to key food suppliers for safety and ethical checks.

- Suppliers must meet agreed specifications and Quality Attribute Sheet (QAS) data at all times. If a supplier becomes aware they cannot meet these agreed specifications, they should immediately notify Marston's prior to any changes being made.
- Marston's may share data with suppliers from time to time. Suppliers are expected to treat all data as sensitive unless explicitly advised otherwise. Suppliers must not handle or store our employee or guest data without our approval. Every effort must be made by our suppliers to protect all data and information they handle, control, or maintain. Suppliers must take steps to protect the confidentiality, integrity, and availability of the data wherever it may be. Suppliers must advise Marston's immediately should a suspected data breach take place.

SUPPLIER AUDITS

Food Safety Audits – What to Expect

Our auditing is carried out by a third-party provider, Food Alert, to assess supply chain assurance and complete risk-based audits with any corrective action processed on our supply base so that we can ensure the products we serve our guests are safe, legal and comply with the standards covered in this Charter.

Prior to the Audit

- Each supplier will be contacted by the Food Alert Planning Team regarding audit completion. An email will be sent to each supplier's nominated technical and primary commercial contacts within the supplying site advising of potential dates to complete the audit. If the dates are not suitable, suppliers will be able to suggest alternative dates, as long as these are reasonable and do not take you over the expiry date for approval. Once a date is agreed by both parties, a Food Alert auditor will be allocated, and they may contact you directly to confirm their agenda.
- Once a date has been agreed, a confirmation email will be sent detailing the date and start time of the audit, and who the auditor will be. Suppliers will also be provided with a copy of the audit template, standard, and a blank corrective action plan.
- Prior to the audit suppliers will be asked to supply pre-audit documentation and confirm that Food Alert has the correct address details for the site to be audited.
- In addition, suppliers will be asked to sign a contract for invoicing and payment and to ensure Food Alert has the correct invoicing information and suppliers are aware of payment terms. This will be sent via DocuSign.

The Audit

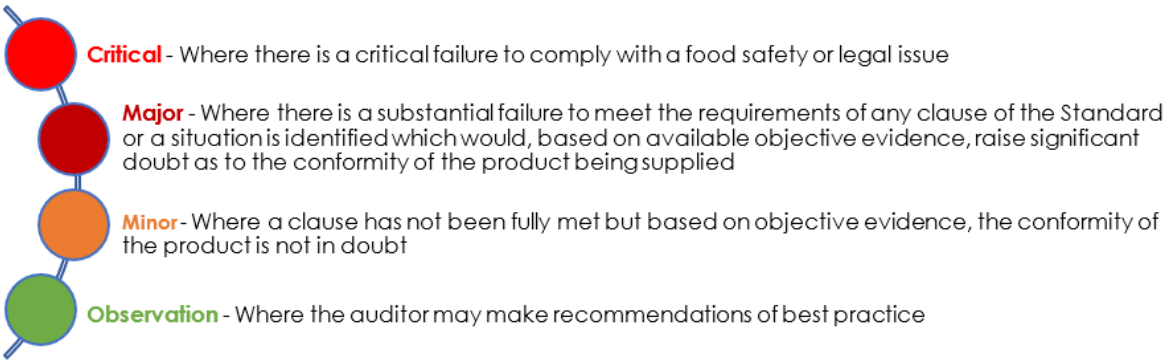
The audit, which may be physical or remote, will cover the following:

- Opening meeting.
- Site tour looking at all production facilities, storage areas, staff area etc.
- Review of the paperwork systems.
- Traceability.
- Closing meeting and review/discussion of non-conformances found.

Non-conformances and Corrective Action

Non-conformances will be discussed during the audit, and the auditor will summarise these at the closing meeting. A copy of the corrective action plan should be printed and signed by both parties before the auditor leaves the premises.

The level of non-conformity assigned by the auditor against a requirement of the Standard is an objective judgement with respect to severity and risk and is based on evidence collected and observations made during the assessment.



Audit Report

The audit report will be available to view on the online system 'Audit65'. Following the audit, suppliers will be provided with log in details for Audit65 to enable viewing of the audit report and any non-conformances that may have been raised.

Submitting Evidence of Corrective Action

If non-compliances have been found, suppliers must submit evidence to Food Alert via the online system 'Audit65' to demonstrate compliance with the standards. The assessor will explain what format will be acceptable, for example a copy of documents, invoices for work completed or before and after photographs. In some cases, Food Alert may be required to conduct a revisit to check on specific issues (this will be agreed with Marston's prior).

If satisfactory evidence has not been received within 28 days of the audit date, this will be reported back to Marston's. If there are a significant number of non-conformances or the nature of the non-conformance requires more than 28 days to rectify, please inform Food Alert and request an extension.

Audit Costs

The audit will be completed by competent auditors, appropriate for your category, and typically take one day. The cost of this audit will be invoiced by Marston's.

In summary, costs cover:

- One day physical or remote audit - base cost plus VAT. Expenses will be charged separately.
- Desktop audits may be used for low risk and branded suppliers and are chargeable at a base cost per audit plus VAT.
- Expenses are classed as 'reasonable' so travel would be by car at 50p per mile, standard rail travel or flights in economy class. Any hotel accommodation required will be booked in a hotel such as Marston's Inns, Premier Inn, or Travelodge. Subsistence allowance is also included for a one course meal with a drink for overnight stays and breakfast the following morning.

Key Timelines for the Audit Process

Food Alert will send a request to the supplier for Pre-Audit Information. Each site will be given 5 working days to provide this information back to Food Alert. If this is not provided within 5 days this will be chased up and then escalated to Marston's.

After the audit is conducted a record of any non-conformances is left with the site on the day of audit.

Any corrective actions must be submitted back to Food Alert within 28 days – further evidence may be requested once corrective actions have been reviewed.

After the audit process has been completed, each supplier's risk rating will be reviewed, and this will determine audit frequency, and the next audit will be scheduled in.

Audit Process Flow

Food Alert will email a copy of the supplier agreement to sign prior to the audit, detailing costs for invoicing.

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Food Alert Planning Team makes contact with the supplier at least 6 weeks prior to the audit due date with potential dates.

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Once date has been agreed a confirmation email is sent out detailing who the auditor will be, date and time. A copy of the audit template, audit standard and non-conformance template will be attached.

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The audit will take place following the below agenda:

Opening meeting
Site tour looking at all production facilities, storage areas, staff area etc.
Review of the paperwork systems.

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Food Alert will email a link to Audit65 within 3 working days which will allow the supplier to view the audit report and any non-conformances found.

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Supplier will submit evidence to close out their non conformance within 28 days via Audit65.

SUSTAINABILITY

Delivering Impact Through Shared Good Times

At Marston's, we believe great pubs bring people together and can be a positive force for change. This belief underpins our approach to sustainability, which is built around the 4Ps: Planet, People, Product, and Policy — pillars that guide how we deliver meaningful impact across our business and within the communities we serve.

Our sustainability strategy aims to ensure that we operate as a responsible and resilient business by identifying, assessing, and managing our environmental and social impacts. As a local pub company with national reach, we are uniquely positioned to shape positive change for all our stakeholders — including the planet, our most fragile stakeholder.

We remain committed to making a difference across four priority areas. Targets for each of the 4Ps are championed and implemented by senior leaders responsible for each pillar. These targets reflect our core values and strategic priorities, and are underpinned by strong polic, encompassing governance, risk management, and stewardship.

To ensure proper stewardship and accountability, our Board and Executive Committee retain oversight of our sustainability strategy and hold ultimate responsibility for achieving our targets and managing climate-related risks and opportunities.

READ MORE IN OUR IMPACT REPORT: https://www.marstonspubs.co.uk/responsibility/

Planet

We are working to reduce our environmental impacts

- Target to achieve Net Zero by 2040.
- Environment: reduce energy costs through efficiency.
- Waste: avoid landfill tax by maintaining our Zero Waste to Landfill status.
- Cleaner energy: Opportunity to take advantage of new technologies to reduce our reliance on fossil fuels. Installation of electric charging points in our pub car parks to encourage visits.

People

We invest in our people and local communities

- Retaining and developing our People. We partner with suppliers who share our values and behaviours.
- Sourcing / ethical Issues: adverse publicity from food ingredient sourcing issues and employment practices used in global food supply chains.
- Community: the success of our community pubs is dependent upon the support we receive within the surrounding area. We celebrate our local communities, and the local pub is recognised as vital in bringing people together.

Product

We care about our guests' wellbeing

- Food safety: we understand the value of our guests' trust in the safety of the food we provide. Safety is at the heart of our pub operations.
- Health and nutrition: nutritional choices are still a priority for many customers.
- Allergen information: safer choices by our customers.
- Continual need to innovate our offering to guests: keeping our guests safe, and providing healthy choices, while at the same time continually attracting interest and enjoyment.

Underpinned by our Policies

Governance of our business: ensuring compliance with legislation, protecting and enhancing our reputation.

SOURCING POLICIES

Full Specification

The Product specification requires a wide range of attributes to be completed over and above those in the NPD phase. The full list of attributes is provided as part of Smart Supplier training, and includes:

- Ingredient Specification – to include country of origin.
- Full allergen and dietary information.
- Quality Attribute Sheet – see quality section for more details.
- Analytics – Micro standards, chemical standards, and physical standards.
- Packaging details – to include primary and secondary layers.
- Depending on information included in the specification, additional mandatory attachments may also be required e.g., RSPO certification.
- Suppliers are responsible to keep product specification under review. As per BRC standards, specification reviews should be sufficiently frequent to ensure that data is current or at a minimum every three years taking into account product changes, suppliers, regulations, and other risks.

Business Rules & Validation

In Smart Supplier there are business rules that need to be met by all suppliers so that we are able to validate our policies and these must be completed before the supplier is able to publish the specification:

- Marston's policy documents must be accepted
- Caged eggs must be 'no'
- Southampton Six colours must be 'no'
- GMO must be 'no'
- Glutamates (Includes MSG) must be 'no'
- Mechanically Recovered Meat must be 'no'
- Palm Oil must be RSPO certified
- Irradiated Food must be 'no'
- HVO must be 'no'
- Acrylamide within benchmark levels must be 'yes'
- Suppliers of all fish products, and complete dishes which contain fish, must be able to provide sustainability specification details.

All the above rules are discussed in more detail throughout this Charter. The Technical team will look to approve or reject any validation exclusion. These include areas such as salt, sugar, and calorie targets; claims, allergens, ESG and nutritional information.

QUID

A Quantitative Ingredient Declaration (QUID) must be completed if the ingredient:

- Is in the name of the food (for example, the 'blackberry' and 'apple' in a blackberry and apple pie);
- Is usually associated with that name by the consumer;
- Is emphasised by words, pictures, or graphics on the label (PPDS only);
- Characterises a food and distinguishes it from products with a similar name or appearance. For example, lasagne made with pork must show the QUID for the pork because it characterises the product and distinguishes it from a lasagne (usually made with beef).

You do not need to give a QUID if the ingredients: have only been used in small quantities as flavouring; are used in varying proportions and can be labelled as fruit, vegetables, mushrooms, herbs or spices (such as in a vegetable soup); already have a quantity shown on the label as a 'drained net weight'.

Nutritional Information

- Any nutritional data entered must be analytical, not theoretical, unless approved by Marston's.
- Energy values will be automatically calculated from the sum of protein, carbohydrate, alcohol, and fat figures on Smart Supplier.
- Suppliers must ensure where products contain bone (e.g. ribs, wings, chops) that the nutritional information provided excludes the weight of the bone.
  McCance and Widdowson's (The Composition of Foods Integrated Dataset) values are acceptable for unprocessed single ingredient products such as cereals, dairy, eggs, meat, fish, fruit, and vegetables.

Allergen Information

As per the EU Provision of Food Information to Consumers' Regulation (No.1169/2011). All food businesses need to provide accurate information about allergenic ingredients used in food.

Marston's requires its suppliers to provide such information on all products. Questions on intolerance information must only ever be answered "Contains" or 'Does not Contain' on Smart Supplier. The answers should reflect the direct ingredients used in the recipe of the product, not what could be present as a result of cross contamination.

If a supplier selects 'May Contain' as an option they must be able to supply their risk assessment and be willing to discuss this with the Marston's Technical Manager so that a decision can be made on whether the allergen is reported as a 'Yes', 'No' or 'May Contain' on reports. Marston's preference is not to have 'May Contain' on products. Marston's will not accept any 'May Contain' Precautionary Allergen labelling (PAL) for egg, crustaceans, milk, fish, or molluscs on vegan products or any 'May Contain' PAL for crustaceans, fish, or molluscs on vegetarian products.

Non-Gluten Containing Ingredients (NGCI) v Gluten Free (GF)
Marston's does not make GF claims on any dishes. However, Marston's does have dedicated NGCI menus for all formats. Suppliers are encouraged to remove gluten where possible and where there is no material effect on the final product. Marston's will not accept 'may contain' labelling for gluten on products to be used on NGCI menus.

Other dietary ingredients
Smart Supplier will also require confirmation of the presence of other dietary ingredients that can cause allergic reactions to our guests. These are garlic, onion, mushroom, tomato, peppers/capsicum and kiwi fruit.

There should be no changes in allergens or nutritional information from the first showing in NPD stages to when the product goes live without prior discussion with Marston's NPD manager.

Shelf Life and Temperature

All food products delivered to Marston's must be within their minimum durability dates and as per the agreed minimum shelf life as defined within the product specification. Further details can be found in Product Supply on page 30. Suppliers must be able to provide shelf-life validation and thermal validation of HACCP cook procedures when requested. Products received at depot should be at the following temperatures:

- Chilled Goods: 1-5°C.
- With respect to raw meats, the recognised best practice is:
  - Poultry and raw meat preparations: 4°C
  - Offal: 3°C
  - Minced raw meat: 2°C
- Frozen Goods: -18°C or below.

Additives including Flavour Enhancers

- Products are not allowed to use the artificial flavour enhancer mono sodium glutamate.
- No food products should contain the Southampton six colours, Sunset Yellow (E110), Quinoline Yellow (E104), Carmoisine (E122), Allura Red (E129), Tartrazine (E102), Ponceau 4R (E124).

Fortified Wheat Flour

In accordance with The Bread and Flour (Amendment) (England) Regulations 2024, suppliers must ensure that any non-wholemeal wheat flour used as an ingredient is fortified with folic acid. This requirement must be implemented by the end of 2026.

Animal Testing

Marston's does not allow any of its products, or ingredients of its products, to be tested on animals. It is the supplier's responsibility to ensure that all raw ingredients used in the production of any Marston's' product are not tested on animals, and suppliers must be able to verify this via their own supply chain management processes, if required.

Acrylamide

Acrylamide is a substance that is produced naturally in food when cooking at high temperatures and has been linked to causing cancer in animals.

Suppliers' products that are susceptible to acrylamide formation must be able to demonstrate good manufacturing practice to monitor and reduce levels based on risk, and this should be included within the production site's HACCP plan. Controls in place should include raw material selection, recipe design, process method (cooking times and temperature) and finished product standards. Suppliers must be able to prove they have a suitable monitoring system in place. Unless previously communicated and agreed with Marston's, products as delivered should never exceed the benchmark levels of acrylamide that are set in the EU legislation.

The legislation applies to the foods listed below and shows the benchmark level of acrylamide in ug/kg:

- French fries, other cut (deep-fried) products and sliced potato crisps from fresh potatoes (500)
- potato crisps, snacks, crackers, other potato dough products (750)
- bread (50-100)
- breakfast cereals (excluding porridge) (150-300)
- fine bakery wares: cookies, biscuits, rusks, cereal bars, scones, cornets, wafers, crumpets, and gingerbread, as well as crackers, crisp breads, and bread substitutes (300-800)
- coffee: (i) roast coffee (400); (ii) instant (soluble) coffee (850)
- coffee substitutes
- baby food and processed cereal-based food intended for infants and young children (40).

Trademarking of Product Brands

Marston's expects suppliers to confirm where a brand name, trademark or registered term can be declared and be able to provide sufficient evidence on Smart Supplier to substantiate such claims, prior to offering the product. The supplier is responsible for ensuring Marston's holds up to date information on how brands are to be represented and that all changes are communicated in a timely manner.

Standards

Through Smart Supplier, all products will need to have chemical, microbiological and physical standards supplied to gain full approval, e.g. microorganisms such as E coli, salmonella, coliforms etc., pH, Brix, acrylamide levels, weight of product, weight per pack. Products such as pies should include weight of pastry case, filling - meat and mushrooms, pastry lid. More information can be found at:
Hazard Analysis and Critical Control Point system in meat plants | Food Standards Agency

HEALTHY EATING & LABELLING

Calorie Reduction

Marston's aims to develop dishes that are full of flavour, in appropriately sized portions, and with an appropriate calorie level. Our menus must always offer a range of calorie contents across all sections, and we will always consider Public Health England's aim to offer meal choices for guests containing 400/600/600 calories for breakfast/lunch/dinner, respectively.

Marston's engages with Public Health England on their calorie reduction plan and recognises that on average we are consuming too many calories on a regular basis, increasing our chances of becoming overweight and obese, which is a leading cause of poor health and premature death.

The 2024 calorie reduction programme challenged the food industry to achieve a 20% reduction in calories in product categories that contribute significantly to children's calorie intakes (up to the age of 18 years) and where there is scope for substantial reformulation and/or portion size reduction. This required work to be undertaken by the eating out of home sector. The products covered by the programme include ready meals, pizzas, meat products, savoury snack products, sauces and dressings, prepared sandwiches, composite salads and other "on the go" foods including meal deals. Marston's continues to work towards reduction targets.

Suppliers must select a calorie reduction category for their product, where relevant, on Smart Supplier.

Salt Reduction

Marston's has a strong history of reducing the salt content in its products in line with the Department of Health's Responsibility Deal. Suppliers must ensure all new lines achieve the relevant Office of Health Improvement and Disparities (OHID) 2024 salt target. It is the supplier's responsibility to ensure all concepts/products presented to Marston's achieve the 2024 salt target. If a category has an average target, that value must be met rather than the maximum level. The salt content of products should be as consumed and not as delivered, and this should be reflected on Smart Supplier.

If a supplier is in any doubt about the category their products fall within, then they should discuss this with us at an early stage of development, avoiding any unnecessary redevelopment further down the line. Marston's has committed that no new product lines will be launched unless they meet these targets.

Sugar Reduction

Marston's continually strives to meet the demand for healthier options, and we support the OHID Sugar Reduction Programme. Suppliers must select a sugar reduction category for their product, where relevant, on Smart Supplier.

Sugar Replacers

Wherever possible, we ask that suppliers avoid the use of artificial sweeteners, such as aspartame and acesulfame K.

Trans Fats and Hydrogenated Vegetable Oil

Marston's is proud to declare that all our meals are free from artificial trans fats and hydrogenated vegetable oils. No new products will be launched that contain artificial trans fats and hydrogenated vegetable oils.

Clear Labelling

We are committed to ensuring that all claims on menus can be substantiated by suppliers and are

included in the product specification. Where provenance exists in a product, we would expect these details to be communicated as part of the NPD process and included within Smart Supplier.

It is the suppliers' responsibility to ensure any claims made meet the health and nutrition claims legislation and be able to provide any evidence on Smart Supplier to support the claim on request.

ANIMAL WELFARE & ASSURANCE SCHEMES

Animal Welfare

Marston's is committed to upholding high standards of animal welfare. We expect all suppliers to apply these standards consistently, both for animals that are reared for meat and dairy products, and for animals used for work and transport. We are further committed to achieving an integrated supply base to allow, wherever possible, whole life traceability. We require suppliers to have RSPCA assurance for products where appropriate, and to inform us of where it is in place.

We specifically endorse the "Five Freedoms" concept:

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

Meat

As a minimum:

- Meat must be reared, transported for slaughter, be slaughtered, and processed according to relevant legislation. The supply chain will be more credible if each of these processes takes place at assured premises, e.g., Red Tractor Assured, Red Tractor and Meat Processing Assured, Quality Meat Scotland.
- Meat entering the chain must be from licensed slaughter premises.
- Carcass and packed meat must be traceable, and the country-of-origin information must be declared in the specification, including details where the animals are born, reared, and slaughtered.
- In respect of meat whose slaughter and preparation method is certified as Halal the slaughter provisions must accord with those appropriate codes and must include humane stunning of the animal prior to slaughter. Marston's does not actively source halal products and has no requirement for suppliers to provide halal certified meat.
- Marston's does not allow the use of any mechanically recovered meat, including Baader, in any products in our menus.
- Marston's does not allow the use of any head meat within our meat products.

Pigs

As a minimum:

- Pigs to be reared to the minimum standards required by the UK Animal Welfare Act 2006/2007 or EC 91/630/EEC 1991. Pigs require enough space to turn around without difficulty, stand up, lie down and rest without difficulty and enough space to allow the animals to lie down at the same time (under legislation for fully grown pigs this is 1.64m to 2.25m).
- Housing must be constructed and maintained to provide a safe and secure environment for livestock. Housing must be appropriately and effectively ventilated.
- Piglets must remain with sows for a minimum of 28 days.
- Marston's insists on a safe and ethical work environment for employees on sites.
- Where employees work with, or have responsibility for pigs, they must be competent to work with the pigs in ways which safeguard the animal's welfare. Along with training records staff must be able to demonstrate competence on farm; management must also regularly review this.

- Medicines and veterinary treatments must only be used where necessary and in accordance with manufacturers' recommendations.
- **Antibiotics or steroid growth hormones must not be used to promote growth or be administered prophylactically. The use of antibiotics must be monitored regularly by the sites' vet with the aim to reduce the usage, and any spikes in antibiotic use must be investigated and any findings acted upon.**

Poultry

Marston's recognises the European Chicken Commitment set for 2026 and the improved animal welfare and food quality standards it promotes:

- Comply with all EU animal welfare laws and regulations, regardless of the country of production.
- Implement a maximum stocking density of 30kg/m^2 or less. Thinning is discouraged and if practiced must be limited to one thin per flock.
  Adopt breeds that demonstrate higher welfare outcomes: either the following breeds, Hubbard Redbro (indoor only), Norfolk Black, JACY57, JA757, 787, 957, or 987, Rambler Ranger, Ranger Classic, and Ranger Gold, or others that meet the criteria of the RSPCA Broiler Breed Welfare Assessment Protocol.
- Meet improved environmental standards including:
  - At least 50 lux of light, including natural light.
  - At least two metres of usable perch space, and two pecking substrates, per 1,000 birds.
  - On air quality, the maximum requirements of Annex 2.3 of the EU broiler directive, regardless of stocking density.
  - No cages or multi-tier systems.
- Adopt controlled atmospheric stunning using inert gas or multi-phase systems, or effective electrical stunning without live inversion.
- Demonstrate compliance with the above standards via third-party auditing and annual public reporting on progress towards this commitment.
- In due course Marston's will require suppliers of all chicken products, and complete dishes which contain chicken, to provide details on adherence to these standards on Smart Supplier.

Fish

As a minimum:

- All fish and fish products supplied must be from sustainable sources. This includes all products that use fish and fish products whether a natural fish product or a composite dish where fish is just one of the ingredients. This principle applies to farmed fish, wild sea fish and shellfish.
- Suppliers of all fish products, and complete dishes which contain fish, must be able to provide the following information on Smart Supplier:
- Current sustainability status of the fish used against the Marine Conservation Society Good Fish Guide. We are committed to ensuring that all the fish we use is from a source rated 3 or above on the Good Fish Guide. If the source is rated 4 or 5 then the supplier must be able to illustrate the steps being taken to improve said rating. It is the supplier's responsibility to liaise with the MCS to identify and rate the source of the product intended for supply to Marston's.
- Our preference is for the MCS Good Fish Guide rating to be provided on Smart Supplier, but alternate accreditations can be supplied if needed: Marine Stewardship Council (MSC), British Aquaculture Policy (BAP), and GlobalGap.
- Commercial name of the species using the EU regulated species glossary (drop down in Smart Supplier).
- The capture method.
- The catch area.
- Tuna must be MSC certified, with a preferred capture method of pole and line.

Chicken Eggs

Suppliers of fresh chicken eggs must meet appropriate standards for health and safety, traceability, shelf life and animal welfare. All new products to be launched with egg as an ingredient must use cage free eggs. In addition to this, Marston's has committed to redevelop all own brand products where egg is used as an ingredient to be cage free by the end of 2025. We encourage branded suppliers to do likewise. All shell eggs have been cage free since early 2019.

Milk

Milk must be produced in a safe, hygienic environment and meet the relevant Codes of Practice.

Health Marks

The identification mark is applied to a product with ingredients of an animal origin to show it has been produced in an establishment approved in accordance with food safety and hygiene regulations, and is typically applied to wrapping, packaging, or labelling. All relevant products supplied to Marston's must display this identification on the outer packaging and details must be supplied on Smart Supplier.

Antibiotics

There is global recognition that there is an increasing need for a more responsible use of medicines and antimicrobials/antibiotics. The spectre of Antimicrobial Resistance ("AMR") increases due to over and inappropriate use in food producing animals and is a likely contributory factor in the increase in resistance to certain antibiotics in human medicine.

If antibiotics are used at any point in the food chain of an ingredient, then the Marston's supplier must have an antibiotic policy in place and be able to provide a copy as part of the SAQ. This includes dairy ingredients in finished products such as desserts, meal centres and sauces.

There are many actions that have been taken and activities in progress to deal with the problem of AMR and a number of these have a bearing on how risk can be assessed by product category and geography. These include:

Global action plans

- In 2005, the World Health Organisation (WHO) agreed that antibiotics should be classified into 3 categories - a) Critically Important Antibiotics (CIAs), b) Highly important (HIAs) and c) Important (IAs). The highest priority CIAs include the fluoroquinolones, 3rd, and 4th generation cephalosporins, macrolides and glycopeptides. Fluoroquinolones and last generation cephalosporins are used to treat life threatening Salmonella and E. coli in humans. Both are used in food producing animals and resistant strains are now being identified.
- A global action plan coordinated by WHO and FAO promotes improved awareness and understanding of AMR; more surveillance and research; the need to decrease the incidence of infection in the first place; to optimise antibiotic use and to develop alternative strategies e.g., vaccines.

National action plans

The UK has various initiatives coordinated through vets, industry (RUMA: Responsible Use of Medicines Alliance) and academic research.

EU action plans

- All growth promoters were banned in 2006.
- 2022 saw the restriction of veterinary antimicrobials across the EU. These new rules ban the routine use of antibiotics and restrict preventative use to exceptional treatments of individual animals.

Industry action plans

- RUMA in the UK promotes the 4 key control principles of a) reviewing biosecurity (e.g., introduction of new animals, screening for disease, equipment disinfection); b) reducing stress (e.g., improved housing, reduce stocking rates); c) good management and hygiene; and d) good nutrition. The RUMA Targets Task Force (TTF) is industry-led and sets sector-specific targets for antibiotic stewardship in UK livestock farming.
- UK poultry sector - voluntary ban on modern cephalosporins, decreased use of fluoroquinolones and restricted use of colistin.

Quality Assurance Schemes

- GlobalGAP in Beef, Lamb and Dairy bans the use of modern cephalosporins and fluoroquinolones. CIAs are not permitted in poultry systems unless in high mortality situations and after sensitivity testing.
- Arlagarden (Arla's own QA scheme) - requires the use of selective rather than blanket dry cow therapy for dairy cows. It supports Red Tractor and introduces a further sixteen standards including use of antibiotics and medicines.
- GlobalGAP - prohibits the prophylactic use of antibiotics in pig systems.
- Red Tractor - routine use of fluoroquinolones is not permitted in broiler chicks and modern cephalosporins are not permitted at any time.

Our policy is to ensure that antibiotics are only used when prescribed by a vet to prevent discomfort or treat illness or when a vet prescribes them for metaphylactic use and no growth promoters are allowed in any medicine or animal feed. All animal medicines must be authorised for use, used appropriately and records kept for 5 years. It is the supplier's responsibility to check through the tiers of the supply chain to ensure conformance.

Suppliers to Marston's must be able to demonstrate on Smart Supplier SAQ that:

- They are aware of the extent of antibiotic use in the products supplied and can indicate whether those used are Prophylactic, Metaphylactic or Therapeutic.
- They have a policy on antibiotic use.
- They are monitoring the overall use of antibiotics.
- Antibiotic reduction targets are in place and where possible provide historical tracking information.

Produce

As a minimum:

- We expect our suppliers to meet the relevant legislation and Codes of Practice applicable in their marketplace and generally strive towards best practice particularly in the use of chemicals and pesticides. Suppliers must have certification to a recognised standard that is appropriate to their operation. This can include BRC, GlobalGap, Red Tractor and LEAF Marque, VEGAPLAN and Europe's Common Agricultural Policy (CAP 2023).
- Residue test results from an accredited laboratory must be recorded and documented actions must be retained for a minimum of 2 years. Suppliers must possess and adhere to a list of the current applicable Maximum Residue Levels for the UK market and must have a robust system of traceability from seed to end product in place.
- The above applies to all produce regardless of whether they are fresh, frozen, or ambient produce or an ingredient of a composite dish. It applies to manufacturers, importers, traders, agents, and producers.
- We endeavour to decrease the risks and impact of pesticides on human health and the environment by encouraging the use of integrated pest management (IPM) and alternate practices, such as non- chemical substitutes to pesticides.
- Where citrus fruits are waxed, we encourage the use of plant-based wax.

BIODIVERSITY, SUSTAINABILITY & ENVIRONMENTAL POLICIES

Soy

Marston's recognises that soy is one of the world's most important sources of sustainable protein and is used as an ingredient within our products. We are committed to ensuring that the soy used in our supply chain is cultivated in a responsible and sustainable manner:

- We recognise the standards of the Round Table on Responsible Soy Association for sourcing responsible soy and encourage our suppliers to work towards these standards.
- We commit to working with our suppliers to ensure that all soy used as an ingredient or compound ingredient in the supply chain is certified sustainable according to a recognised certification scheme.
- We commit that no product used in Marston's containing soy will be confirmed as suitable if the origins are not confirmed as suitable.
- In due course, we will require suppliers of all products containing soy to provide details on adherence to these standards and to provide copies of certification on Smart Supplier.

Palm Oil

Palm oil is the most widely used vegetable oil in the world and has the highest yield when compared to other oil crops per hectare of land. If produced and sourced sustainably, palm oil can play an important role in providing for the growing global demand for vegetable oil.

Suppliers must ensure that all palm oil used in Marston's products, either as an ingredient or as a processing aid, is RSPO certified and wherever possible comes from a segregated supply chain. Evidence of certification must be provided on Smart Supplier.

Where palm oil is present, the supplier will be required to provide a copy of the RSPO certification on Smart Supplier and ensure these are kept up to date.

Environment

Suppliers must ensure the following:

- Waste and pollutants are minimised and disposed of in an efficient, safe, and environmentally responsible manner.
- Comply with international, national and sector codes of practice concerning the use of chemical products, including pesticides.
- Seek to make continuous improvements in their environmental performance and, as a minimum, comply with the requirements of local and international laws and regulations.
- Make practical efforts to minimise emissions, the use of energy, water, and raw materials. Where possible these resources must be renewable. We encourage suppliers to collect and reuse water where possible, and it is safe to do so.
- Avoid contamination of the local environment and ensure that air, noise, and odour pollution is within nationally defined limits.
- Take proactive measures to increase wildlife such as green walls, native species, wildlife friendly planting, wildflower meadows, wetland habitat, soil stores, flower beds for bees, owl boxes and hedging are all encouraged.
- Consider biodiversity through the lenses of dependencies, impact, and mitigation.
- Minimise the use of plastic and where possible, substitute materials that have lower environmental impacts.
- Eliminate difficult or unnecessary single use packaging through better design.

- Reduce 'Food Miles' and ensure transport is low carbon where possible, promoting these values within their supply and distribution chains.
- Work with Marston's to understand and improve the environmental credentials of products.

Carbon Reporting

As the impacts of climate change unfold, the hospitality industry is taking action, united under a meaningful, practical plan to reduce, then eliminate, our carbon footprint. Marston's is a member of the Zero Carbon Forum (ZCF), which is developing defined roadmaps backed by peers, government, and leading sustainability experts.

With the hospitality industry responsible for 20% of emissions in the food supply chain, it is essential for there to be a collaborative effort in tackling the challenge of reducing emissions across the value chain.

Scope 1 & 2 emissions are associated with a company's direct operations and energy use. This makes them easier to track and manage compared to Scope 3, which are indirect emissions linked to a company's operations via its supply chain. Marston's has undertaken a number of initiatives to improve its Scope 1 & 2 emissions over recent years, and we are actively looking at new ways we can accelerate these efforts.

Marston's has set a target to achieve Net Zero by 2040. To achieve this, we must collect detailed information on the emissions for our products and operations. We expect our suppliers to support us in this endeavour.

In 2025/2026, we are now turning our focus towards our Scope 3 emissions as we know they account for approximately 90% of the overall emissions created by the hospitality industry. There are a number of different conversion factors but through our work with other members of the Zero Carbon Forum, Smart Supplier aligns with BRC and WRAP emissions factors. If a bespoke product carbon footprint is available this would be preferred. This information should be provided in Smart Supplier or other data requests.

Energy Use

Suppliers should ensure that energy usage is minimised and reduce their carbon footprint by sourcing locally and minimising food miles.

We encourage the use of renewable energy to reduce carbon emissions. Suppliers will be asked to provide information on energy use, carbon emissions and water usage as part of the SAQ. The figures provided must be from the point of manufacture to allow comparisons to be made and help support our work with the Zero Carbon Forum. An agent/broker should not provide their "office or depot" figures but instead provide details from the point of manufacture.

Waste

Marston's operates as a zero waste to landfill business and, where possible, enforces the waste hierarchy. We strive to reduce the amount of waste generated through improving management practices and reducing packaging. For the packaging that is necessary to operate, we endeavour to move to more sustainable, reusable, and recyclable materials. We are keen to promote the circular economy and develop further closed loop solutions to manage our waste as a commodity.

Suppliers are required to:

- Supply details of primary, secondary, and tertiary packaging for all products on Smart Supplier. Information is not required for any piece of packaging that will not be delivered to an actual pub (e.g., pallets).
- Avoid sending waste to landfill.
- Review and move waste practices up the hierarchy where possible
- Minimise packaging in products and distribution or substitute for those with lower environmental impacts without risking product preservation.
- Eliminate difficult or unnecessary single use packaging.
- Make 100% of plastic packaging recyclable by 2025 and end use of difficult to recycle plastics (e.g., PVC, black plastics).
- Ensure 30% of all plastic packaging is made from recycled material by 2025.
- Ensure all non-plastic packaging is recyclable and easily segregated.

The table below shows Marston's preferred packaging materials:

Green – Preferred (Materials that are easily recycled in the UK and can have high % recycled content)	**Red – Avoid** (Difficult to recycle materials)
Glass	PVC
PET - Polyethylene terephthalate	Polystyrene
PE – Polyethylene (for flexible film)	Industrial compostable/biodegradable plastic
HDPE & LDPE	Oxo-degradable materials
PP - Polypropylene	Dark plastics e.g., black plastics, that are non- detectable at recycling plants
Steel	PLA – Polyactic acid
Aluminium	
Sustainably sourced wood, cardboard & paper	

Task Force on Climate-Related Financial Disclosures

Marston's is committed to reporting in accordance with the Task Force on Climate-Related Financial Disclosures ("TCFD"). TCFD requires companies to disclose within their financial filings on four core areas to do with climate change: governance, strategy, risks, metrics, and targets.

TCFD obligates companies to report the risks to their business model posed by an increase in global temperatures and its strategy to remain sustainable. The reporting must include explanatory scenarios based on different predicted increases in temperature. Whereas previous regulation on environmental reporting has focused upon reporting past emissions, TCFD requires the Board to report on the possible impacts in the future. Going forward, we will look to engage with our suppliers on TCFD.

Our full TCFD report can be found on our website: www.marstonspubs.co.uk

Deforestation, Land Use Change and Biodiversity

- As part of the FLAG (Forest, Land and Agriculture) Marston's aim is to reduce land-based emissions, particularly linked to high-risk key ingredients (Beef, Poultry, Pork, Dairy, Maize, Palm Oil, Rice, Soy, Wheat)
- Marston's aims to avoid deforestation or peatland degradation in the supply chain for procured goods including land used for growing and grazing of animals and for growing of crops used for animal feed
- All newly onboarded suppliers will be expected to work towards meeting the minimum requirements set out by the Science Based Targets initiative (SBTi). Marston's will provide guidance and support upon request to facilitate compliance.

- All newly onboarded suppliers will be required to align with emerging regulatory frameworks, including compliance with the UK Forest Risk Commodities (UKFRC) regulations.
- If a product contains any of the key commodities identified under the EU Deforestation Regulation (EUDR)—specifically soy, palm oil, cocoa, beef, or coffee—you are required to apply the relevant Deforestation Specification to each applicable ingredient and provide the associated EUDR deforestation data. While EUDR does not currently apply to Marston's, the information collected is essential for alignment with the UK Forestry Risk Commodity Regulation (UKFRC) and supports reporting under the Science Based Targets initiative (SBTi).

Deforestation and Land Use Change

Deforestation and land use change are now recognised as the second leading contributors to global climate change, following the burning of fossil fuels. These activities account for approximately 12–20% of all greenhouse gas emissions. Forests are vital ecosystems, hosting around 80% of terrestrial wildlife and supporting countless species found nowhere else. Yet, in the past 60 years, more than half of the world's tropical forests have been destroyed—threatening biodiversity and placing iconic species such as orangutans, great apes, tigers, leopards, and jaguars at risk.

Key commodities—including cattle and palm oil—have been identified as major drivers of deforestation. The UK Government advocates for collaborative partnerships with producer countries to strengthen forest governance and prevent illegally deforested goods from entering global supply chains.

To support this, the UK introduced legislation under the Environment Act in 2021, aimed at tackling illegal deforestation linked to UK supply chains. This flagship measure delivers on the UK's commitment—alongside over 140 nations at COP26—to halt and reverse deforestation by 2030.

Schedule 17 of the Environment Act outlines three core requirements for regulated businesses:

- Prohibition on the use of illegally produced forest-risk commodities, including both raw and derived products.
- Implementation of a due diligence system for each regulated commodity.
- Annual reporting on due diligence activities, with elements of these reports made publicly available to ensure transparency.

Secondary legislation is currently being developed to operationalise these requirements, focusing on four high-risk commodities: cattle products (excluding dairy), cocoa, palm oil, and soy. These account for an estimated 64% of the UK's tropical deforestation footprint, with up to 93% of this deforestation likely in breach of local laws. Regulating these commodities is expected to address over half of the UK's deforestation impact.

Marston's Commitment

Protecting our climate and natural environment is a priority for Marston's. Our industry depends on the health and resilience of soil and biodiversity to sustain food production. We recognise the global responsibility to safeguard natural systems and are taking proactive steps to align our operations with this goal.

In line with the Science Based Targets Initiative, Marston's has begun transitioning its supply chain to exclude deforestation-linked commodities. Understanding the impact of food production on land use change is essential to assessing our environmental footprint. We will request data from suppliers to evaluate this impact and may require certification for high-risk, material commodities to evidence compliance. This information should be provided upon request.

Furthermore, we actively promote and encourage suppliers to manage agricultural, aquaculture, fisheries, and forestry areas sustainably, applying biodiversity-friendly practices to protect ecosystems and support long-term resilience.

ETHICAL TRADING

SEDEX

SEDEX membership is recommended to all Marston's suppliers. Suppliers are asked to provide details of SEDEX membership, if relevant, and complete an additional questionnaire as part of the SAQ. A copy of a SEDEX Members Ethical Trade Audit (SMETA) can also be uploaded. Marston's expects transparency of supply chains.

Ethical Business Practices

Marston's maintains high ethical standards in carrying out its business activities and will only trade with suppliers who adopt ethical business practices and adhere to strict principles that do not compromise our integrity and honesty. The SAQ on Smart Supplier requires a copy of the supplier's ethical policy to be uploaded.

Legal Compliance

Suppliers must ensure full adherence to all relevant laws and regulations within their jurisdiction. Where there is a conflict between legal standards and these principles, the supplier must comply with whatever standard affords workers the highest level of protection.

Health and Safety

Suppliers are required to adhere to all national and local Health and Safety regulations. Suppliers must ensure they conduct their business in line with industry best practice in their specific field.

Seasonal/Agency Workers

Marston's may request information on the terms of employment and methods of recruitment of seasonal / agency workers.

Pay

- Wages and benefits must be at least fully comparable with local industry benchmarks or national legal requirements, whichever is higher. Wages must always be sufficient for basic needs whilst still providing some discretionary income. Wages should be paid in full and on time, at agreed intervals.
- Before entering into employment, workers should be informed as to the payment process. Wages must be paid directly to the workers in the form of cash or cheques or into the workers' nominated bank account. Information relating to wages must be available to workers in an understandable form.
- No deductions from wages, other than those required by national law, must be permitted without the express agreement of the worker concerned. Deduction from wages for disciplinary purposes must not be permitted.

Working Hours

- We expect suppliers to conform to industry benchmarks and local and national laws relating to their employees' working hours. Hours must not be excessive and include proper provision for sleep and resting time.
- Workers must not be expected to work in excess of 48 hours per week, or less if there is a lower national limit or an agreed industry benchmark.
- Overtime should be voluntary, limited to no more than 12 hours per week, and not requested on

a regular basis; it must be paid at a premium rate or in accordance with national legislation.

- There should be proper provision for rest and sleep. Breaks, holiday allowance and rest periods must be in full accordance with national law. Individual workers should have on average at least one full day's rest per 7 days of work, or the equivalent if shift work is involved.

Working Conditions

- We expect suppliers to provide suitable and safe working environments for all workers which, at the very minimum, uphold local standards.
- Every effort must be made to provide a safe and hygienic working environment. Adequate steps should be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work. Suppliers must have appropriate procedures in place to deal with serious injuries.
- Suppliers must complete fully documented risk assessments of their sites and accommodation provided, and regularly monitor risks posed to workers.
- Suppliers are expected to assign a senior management representative to be responsible for health and safety issues. Suppliers should set up procedures to consult with employees to seek their contribution in assessing the site's health and safety and in developing health and safety standards.
- No worker should be employed in potentially hazardous conditions without having received adequate safety training and supervision. Health and safety training must be commensurate with suppliers' own health and safety responsibilities and must accord with the risk of hazard to which the worker is exposed.
- Records of safety training must be available for inspection on request. Individual workers must be able to demonstrate their understanding of the job and their ability to perform it to at least the minimum standard required by their employer.
- Suppliers must provide essential items of climatically appropriate protective clothing and safety equipment free of charge to their workers.
- Workers must be provided with access to potable drinking water, clean toilets and washing facilities.
- Where provided, accommodation must be safe, clean, and meet basic needs.
- Secure storage facilities should be provided. Suppliers should provide a range of mixed gender, segregated and family accommodation as appropriate for the number of workers housed.
- Where management provides dedicated transport for the movement of the workforce to, from, or within the workplace, these must conform to the minimum standards set down in the appropriate national transport legislation. In the absence of such legislation, the management must make every reasonable effort to minimize risks to the workforce whilst transporting them.
- Food, beverages, and domestic goods offered for sale to workers must be at price levels no higher than those prevailing nationally.

Employment of Children and Young People

- Suppliers must clearly document and communicate their policies with staff for prohibiting child labour in the workplace.
- Our suppliers must not employ any worker who is either:
    - younger than the applicable legal minimum age of employment, OR
    - younger than the age of completion of compulsory education, whichever is higher.
- In any event, our suppliers are absolutely prohibited from the employment of those under the age of 15.
- Young workers are distinguished as those between the ages of 15-18. We expect our suppliers to give particular focus to the health and safety and educational needs of young employees.
- Young people aged between 15 and 18 must not be expected to work throughout the night or under potentially hazardous conditions.
- If the supplier discovers that children are working for the supplier involved, the supplier will be expected to cease the practice and provide remediation for the children concerned, including support for the child to attend and remain in quality education until no longer a child. The supplier must also immediately notify Marston's of any such occurrence.

Forced Labour

- All work must be conducted on a voluntary basis and free from the imposition of any penalties or sanctions. We absolutely do not agree to purchase any products from any supplier that are produced through forced, bonded, or involuntary labour. We will not tolerate slavery and human trafficking by any of our suppliers for Marston's, or any other purpose, and fully expect our suppliers to take active steps in ensuring the same. The SAQ on Smart Supplier requires a copy of the supplier's modern slavery statement to be uploaded.
- Suppliers must allow their employees the right to leave after giving reasonable notice. Workers must not be required to lodge deposits or I.D. papers unless it is a legal requirement to do so. In all circumstances, these must be returned promptly upon cessation of employment.

Freedom of Association and Employee Representation

- Suppliers' employees must have the fullest practicable rights of freedom of association. We encourage suppliers to share information with their employees and to develop effective mechanisms for consultation.
- Suppliers must recognise and respect the rights of workers to freely join associations (such as workers' councils, trade unions and workers associations) which can collectively represent their interests. Employers must not interfere with or attempt to dominate or control such bodies, nor discriminate against workers choosing to belong to them.
- Suppliers should respect the rights of such workers' associations to represent their members and to bargain collectively as defined and interpreted by the International Labour Operations (ILO) and national legal framework.
- Suppliers must share with their employees any information which will affect working conditions and develop effective mechanisms for consultation.
- Where the right to freedom of association and collective bargaining is not permissible under national law, suppliers should facilitate the development parallel means of independent and free association and bargaining.

Treatment of Workers

- Physical abuse or the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is absolutely prohibited.
- Disciplinary and grievance procedures must be clearly documented and communicated to all employees. All disciplinary measures must be recorded.

Equality of Treatment

Provided that all workers show sufficient ability and capability, our suppliers must provide them with equal access to jobs.

- There must be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on (but not limited to) gender, age, disability, national origin, race, marital status, sexual orientation, political opinion, union (or non-union) membership, religion or caste. Workers must not be expected to perform duties incompatible with their physical or mental abilities

PRODUCT SUPPLY, REJECTION & RECALL

Delivery Times

Deliveries direct to pubs, or to our Distribution Centres, must take place within agreed delivery times, and where necessary are booked in ahead of the delivery.

Delivery Temperatures

The following temperature requirements apply to all frozen or chilled food deliveries:

- Chilled Goods: 1-5°C.
  - With respect to raw meats the recognised best practice is:
  - Poultry and raw meat preparations: 4°C
  - Offal: 3°C
  - Minced raw meat: 2°C
- Frozen Goods: -18°C or below.
- Frozen or chilled goods that fail to meet temperature requirements will be rejected.
- Previously rejected stock will not be accepted on redelivery without the written authority of the Marston's Technical Services Team. Rejected deliveries will be recorded as delivery failures and will be liable to cost recovery.

Food Deliveries

All 'mixed' product pallets must be stacked in layers, with segregation between each layer.
Case labels must be facing outwards and be visible.

All cases must be labelled with:

- Product code (both supplier and Marston's where possible).
- Description.
- Pack size – all case size and product weight changes must be notified to Marston's at least 6 weeks before the change is due to happen. This will prevent any deliveries being rejected.
- Date code - Suppliers must not mix date codes of the same product on a pallet and under no circumstances have shorter dated product hidden in the centre/core of a pallet.
- Storage temperature e.g., 'Store at or below -18°C.
- Specific special handling instructions.
- A GTIN-13 / GTIN-14 Barcode - any change to this barcode should be flagged to Marston's ahead of time.

Any products that fail to meet the agreed specification e.g., mouldy, or damaged, will be rejected by the pallet i.e., if there is one affected case the pallet will be rejected. If damages are found within pallets at a later point, this will be reported to the supplier for rectification/replacement at the supplier's cost. Once unloaded, goods will be checked against the delivery sheet.

Vehicle Requirements

Vehicles/trailers used for the transportation of food products must be suitable for the purpose, maintained in good repair, in a hygienic condition and not contain materials which compromise the safety or quality of the goods.

Shelf Life

All date codes are checked and recorded. If shelf life, or validated product temperature, does not meet the agreed parameters, the stock will be rejected.

Marston's expects all frozen items to have a minimum of 9 months' shelf life from point of delivery and ambient products to have 12 months. Anything less than this should be discussed with Marston's Supply Chain before delivery is made.

Pallets delivered into distribution centres must not have mixed BBE or Use by dates.

At times, Marston's may make requests for shelf life extensions for products to extend the life past the original BBE date. These are granted at the discretion of the supplier having considered food safety and quality.

Product Non-Conformance

Any rejection is considered a serious breach of this agreement. It must be followed by a full investigation by the supplier identifying the causes, rectification proposal and long-term preventative actions. Suppliers will also be liable to make a cost recovery.

Rejection and Recall

Safety and quality issues resulting in rejections or full recalls from pubs within Marston's are considered a material breach of contract.
We will recall a product when:

- The product is unsafe for human consumption.
- The product quality is at such a level that consumption could be commercially damaging.
- A foreign body is found and believed to have come from the manufacturing process.
- A significant number of complaints from pubs through the Catering Hotline.
- At the request of the manufacturer.

Marston's will communicate the need to recall both verbally and in writing to the supplier. Where a product is recalled from pub, we will give pubs 7 days to return stock to depot. The supplier will then need to collect recalled product from depot within 7 days.
Marston's and A F Blakemore will confirm the quantity to be collected, and the credit required – credit should be forwarded to A F Blakemore within 30 days.
It may be necessary to recoup costs from the supplier for loss of sales/reputation during the period product was not available – this will be discussed as each situation arises.

If a supplier is aware of a problem with a product that requires recall, then they should contact the Senior Technical Manager or Catering Hotline on 01902 329133 as soon as they are made aware of the problem themselves.

Supplier Responsibility

It is the responsibility of the supplier to notify Marston's immediately if it becomes aware of any defective goods which have been supplied to the Distribution Centre or pubs directly.

Defective goods are defined as any goods that are unsafe or unfit for consumption, use or which fail to comply with the specification. This will include, but is not limited to:

- Product safety, quality, or legality.
- Foreign objects or infestation.
- Product labelling.
- Product packaging.

In the event that the Supplier notifies Marston's of any defective goods, or Marston's has reasonable grounds to believe that any of the Supplier's goods are defective, Marston's may, at its sole discretion, recall all affected goods or agree a course of remedial action with the Supplier.

The following information must be provided when reporting defective goods:

- Batch numbers.
- Product details.
- Product code and date codes.
- Full description of the problem.
- Amount of goods affected.

Guest Complaints

Marston's receives quality complaints from pubs and guests who visit them. Together with our suppliers we need to ensure that every complaint is thoroughly investigated and that the guest is responded to in a timely manner. Any complaints left unresolved for too long generate a negative impression for the guest.

Any complaints on product quality or foreign bodies will be directed from our Catering Hotline. The hotline operates 7 days a week 9am until 5.30pm and Bank Holidays 9am until 4pm but is closed on Christmas Day, Boxing Day, and New Year's Day. Our pubs contact us via email or phone with any product issues they may have.

The Catering Hotline will transfer any complaints for quality or foreign body onto Smart Supplier. Information will include date codes, batch code, product code, nature of the complaint, photographs (if available) and pub contact details.

The product/foreign body in question will be held at the pub. It is the supplier's responsibility to make contact with the pub by phone within 24 hours of being notified of the problem. The supplier should make every effort to collect any affected product/foreign body to enable them to complete a full and thorough investigation. Where collection is not possible the supplier must tell the pub to post the item to them via registered post. It is not necessary to send a SAE to the pub as this will delay the investigation.

The supplier must provide a written response to every complaint within 7 working days on Smart Supplier. The response does not need to be sent to the pub as Marston's will handle that communication.

Where credit is due to the pub for the affected product, this should be covered in the response. The Supplier is responsible for providing A F Blakemore with a credit note so that it can be passed onto the pub. Suppliers are not to send cheques, vouchers, or cash to the pub as recompense for the complaint. Where replacement product is offered to the pub, the supplier must arrange direct delivery of said product to the pub – we cannot arrange this via A F Blakemore.

Suppliers are only to contact the pub who raised the quality problem; they are not to make contact with the actual guest.

Appendix 1

SAQ

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Marstons SAQ

Company Details

1 Company Details

SAQ Part 1

1.1 Do you have an Animal Welfare Policy that conforms to the Marston's Food Supplier Charter? If Yes, please provide a copy.

○ Yes ○ No ○ NA

Select files... Drop files here to upload

1.2 Do you follow the RSPCA Five Freedoms policy?

○ Yes ○ No

1.3 Do you have a policy to monitor and reduce the use of antibiotics? If Yes, please provide a copy of your reduction plan and provide information on the type of antibiotic use.

○ Yes ○ No ○ NA

Select files... Drop files here to upload

1.4 Does your policy allow the use of prophylactic antibiotics?

○ Yes ○ No

1.5 Does your policy allow the use of metaphylactic antibiotics?

○ Yes ○ No

1.6 Does your policy allow the use of therapeutic antibiotics?

○ Yes ○ No

1.7 Do you have evidence of annual DNA testing for horsemeat in all meat and minced meat products? If Yes, please provide a copy.

○ Yes ○ No ○ NA

Select files... Drop files here to upload

1.8 Do you carry out any residue testing for chemicals and peticides? If Yes, please provide a copy.

○ Yes ○ No

Select files... Drop files here to upload

1.9 Do you have full compliance with all relevant food legislation e.g. food additives, novel food, food labelling, food flavours and colours?

○ Yes ○ No

1.10 Does the company have a documented product withdrawal and recall procedure? If Yes, please provide a copy.

○ Yes ○ No

Select files... Drop files here to upload

1.11 Do you have a procedure to control non-conforming product? If Yes, please provide a copy.

○ Yes ○ No

Select files... Drop files here to upload

1.12 Do you have a documented HACCP plan for the products supplied and does it cover allergens? If Yes, please provide a copy.

○ Yes ○ No

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1.13 Does the business have a documented incident and emergency procedure in the event of an incident that may impact food safety, legality or quality? If Yes, please provide a copy.

○ Yes ○ No

Select files... Drop files here to upload

1.14 Do you have a CSR statement? If Yes, please provide a copy.

○ Yes ○ No

Select files... Drop files here to upload

1.15 Do you have and Ethical Policy that conforms to the Marston's Food Supplier Charter? If Yes, please provide a copy.

○ Yes ○ No

Select files... Drop files here to upload

1.16 Do you have a Modern Slavery Policy? If Yes, please provide a copy.

○ Yes ○ No

Select files... Drop files here to upload

1.17 Do you follow the Corporate Code of Ethics published by CIPS (Chartered Institute of Procurement & Supply)? If Yes, please provide a copy.

○ Yes ○ No

Select files... Drop files here to upload

1.18 Do you have SEDEX membership? If so please provide your membership number so that we can initiate a relationship with you.

○ Yes ○ No

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1.19 Have you completed a SEDEX questionnaire or received a SMETA audit? If Yes, please provide a copy.

○ Yes ○ No

Select files... Drop files here to upload

1.20 What is your total annual energy consumption in kWh?

1.21 What is the % of your total energy use that is being provided by renewable energy (if not all)?

1.22 What are your total annual carbon emissions in CO2e?

1.23 Have you got a target to reduce CO2e? If so by how much?

○ Yes ○ No

1.24 What is your total annual water use in m3?

1.25 Have you got a target to reduce water consumption? If so, by how much?

○ Yes ○ No

1.26 Do you have a policy in place and a certificate for the Chemicals and Pesticides? If Yes, please provide a copy.

○ Yes ○ No

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1.27 Are any Chemicals or Pesticides used on any of the ingredients in the product?

○ Yes ○ No