

	5.2-POL-3-F	Date Of Issue: 22/10/15	Page 1 of 3	Owned And Authorised By: Martin Jarvis	Title: Ethical Food Policy	Affected Department: All
---	-------------	----------------------------	----------------	---	----------------------------	-----------------------------

Contents:

SOCIAL RESPONSIBILITY POLICY 1

NUTRITIONAL POLICY 1

ALLERGENS POLICY 2

AGRICULTURAL POLICY 2

GENETICALLY MODIFIED ORGANISMS POLICY 2

SOCIAL RESPONSIBILITY POLICY

Leathams Ltd is an international food business who sources many speciality products around the world to offer them to our customer base. As we broaden our supplier base, especially in developing countries, we are conscious our share of responsibility for social development, care for the environment and our suppliers’ employee welfare.

We take our programmes in social responsibility very seriously and use this policy as a framework upon which to guide its practices in the area of the environment, including waste management, carbon offsetting and sustainability along with ethical and fair trade towards our suppliers and customers alike.

This policy ensures that Leathams:

- meets or exceeds the minimum regulatory requirements of the UK and those countries in which it operates
- takes into consideration local customs and practices when formulating the strategy for best practice
- sets targets in each of the key areas defined above and monitor the degree of compliance with these targets via management review process.
- puts in place appropriate procedures to execute this policy
- implements a training program for its staff to raise awareness of social responsibility issues and enlist their support in improving the Company’s performance
- encourages the adoption of similar principles by its suppliers, and monitor this process through appropriate audit
- makes reasonable commercial decisions based on the degree of compliance with the said standards and where possible plans its products and activities, with these pre-requisites in mind

NUTRITIONAL POLICY

Leathams Ltd is dedicated to sourcing fine foods which are not only safe and of a good quality, but provide the purchaser with an informed choice regarding labelling of its nutritional value.

Leathams ensures that its nutritional policy is in line with best practice for the industry and complies with or exceeds the guidelines set by the FSA.

We are committed to provide clear nutritional information and tools to help its customers to design healthy and tasty products and menus for both adults and children. Our Technical team works with its suppliers to ensure they are working to the same defined goal.

To enable our customers to make an informed choice in terms of nutrition, our specification clearly details the nutritional value of our products and calculates the percentage of Reference Intake (RI) in a typical serving (for adults). It also ascribes a traffic light colour to the nutritional table. As part of our routine specification update, our nutritional information is regularly challenged.

Any health claims added onto our labels are in line with FSA guidelines and justified through nutritional analysis. Hydrogenated fats are not used in the formulation of our products.

	5.2-POL-3-F	Date Of Issue: 22/10/15	Page 2 of 3	Owned And Authorised By: Martin Jarvis	Title: Ethical Food Policy	Affected Department: All
---	-------------	----------------------------	----------------	---	----------------------------	-----------------------------

ALLERGENS POLICY

Leathams Ltd is committed to clear allergen labelling and manages its supply chain in a way to minimise the risk of allergenic cross contamination.

As a member of CAMPDEN BRI, we keep up-to-date with EU/UK legislation updates and guidelines on allergenic matters.

Specifically, we work in close collaboration with our suppliers in order to ensure that allergens are managed appropriately and that the allergen risk is effectively and uniformly assessed. Any allergens deemed a risk is appropriately indicated on the specification and declared on the label, to ensure that both our customers and consumers can make informed decisions. We also request our suppliers to consider non mandatory allergens in their risk assessment.

The “allergen” hazard is part of our HACCP study and has been risk assessed in accordance with CODEX standards. It has deemed that certain allergens need segregation and have specific and defined management systems for their handling, including cleaning in the event of a spillage. The extent of this list is dependent on the risk assessment conducted and reviewed annually as part of the HACCP review.

AGRICULTURAL POLICY

At Leathams Ltd, we do not grow or manufacture foodstuffs. We therefore work closely with our suppliers to follow specific requirements outlined in its agricultural standards. This forms part of our audit process carried out by our trained Technical team.

This document verifies the application of best agricultural practices on the field, the impact on the environment, the sustainability of the process.

This assessment is used as a key part to our vendor rating scheme and is used to set metric for each suppliers continually improvement in this respect.

The agricultural policy is reviewed by top management at regular intervals to ensure its continued relevance and that is consistent with our business strategies.

GENETICALLY MODIFIED ORGANISMS POLICY

All products supplied to customers fully comply with all current UK and EU legislation including, although not exclusively:

- Regulations (EC) 1829/2003 on GMO food and feed and amending regulations
- Regulations (EC) 1830/2003 on GM traceability and labelling
- Directive (EC) 2001/18 on the deliberate release of GMO's in to the environment
- The Genetically Modified Food (England) Regulations 2004

All our foods are clearly labelled and imported in accordance with the legislation above. The maximum limit we are permitting is 0.1% for the adventitious, or accidental, presence of GM material in non-GM food.

Leathams Ltd obtains the necessary information from suppliers and their upstream suppliers in order to ascertain the status of products with respect to genetically modified organisms. As part of the assessment of suppliers and product approval, Leathams will regularly challenge the supplier's ability to justify any inclusive or exclusive GMO claims made.

Leathams Ltd also actively discourages the use of genetically modified materials within its product range and requests that suppliers always use GM free alternatives wherever possible.

Version 5	Reason For Issue: Annual Policy Review	Uncontrolled Copy If Printed
-----------	--	------------------------------

	5.2-POL-3-F	Date Of Issue: 22/10/15	Page 3 of 3	Owned And Authorised By: Martin Jarvis	Title: Ethical Food Policy	Affected Department: All
---	-------------	----------------------------	----------------	---	----------------------------	-----------------------------

For ingredients of which GMO-free status cannot be warranted this will be indicated to customers in our product specifications in the food intolerance spreadsheet.

Date: 22/10/15

Signed:



Martin D Jarvis
Technical Director
Leathams Ltd