

Cocoa Sourcing Policy

Document Reference: GRP-PCY

Date Implemented: March 2020

Version: 01

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BACKGROUND

The Warehouse is on a journey to be New Zealand's most sustainable company. We are the largest company in NZ to be certified carbon neutral. 100% of our operational emissions are offset. We are committed to high labour and environmental standards in factories making our products - each of our private label factories is independently assessed to ensure they meet our standards. We are on a drive to eliminate waste especially plastic waste in our packaging.

We are also seeking more and more sustainable products to meet customer demand and underscore our commitment to social and environmental responsibility.

Our <u>Ethical Sourcing Policy</u> requires all suppliers to extend these responsibilities to their own supply chains. These value chains include factories manufacturing finished products for The Warehouse Group; facilities carrying out subsidiary (versus primary) manufacturing processes; and, finally - the extraction or cultivation of raw materials.

COCOA

Cocoa is an invaluable raw material in chocolate, confectionary and other foodstuffs. The preponderance of small lot farmers in developing countries carries with it risks of child labour and bonded or forced labour.

The Warehouse Group requires that all suppliers of chocolate, confectionary, or other foodstuffs containing cocoa provide assurance that the cocoa supply chain associated with their merchandise is free of such child, and bonded or forced labour practices.

Most often this assurance will be by way of certifications such as UTZ (https://utz.org/); Fairtrade (https://www.fairtrade.net/product/cocoa).

Certifications may be held in the name of the end supplier to The Warehouse or in the name of the supplier's own upstream cocoa or chocolate supplier.

Evidence of the above (or equivalent) assurance must be provided to our buying or sourcing team members at the time of new product submissions and renewed annually (or at the interval prescribed by the certification) thereafter.

Such evidence (as to the absence of child, bonded or forced labour) constitutes a claim as defined within New Zealand's New Zealand Fair Trading Act. Substantial penalties may be applied for making unsubstantiated or false and misleading claims or statements.

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Claims may only be made based on reasonable grounds. Reasonable grounds can come from:

- Information provided by reputable suppliers or manufacturers
- Information the business making the claim holds
- ➤ Any other reasonable source (for example, scientific or medical journals).

These reasonable grounds must be met and the associated documentation in our possession prior to the product going on the market.

The strongest grounds for a claim are those provided by certifications such UTZ or Fairtrade. However, there may be cases where a claim can be made without certification, provided the above reasonable grounds criteria are be met. This might be the case where the transaction value is too low to carry the disproportionate cost of certification. Such claims without certification will be assessed by The Warehouse Group on a case by case basis. Claims must be accurate, scientifically sound and substantiated prior to the goods going into production or on sale.

POLICY COMPLIANCE PERIOD

In the case of products containing cocoa on sale at the date of publication of this policy suppliers have six months to provide this assurance.

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