



SUPPLIER CODE OF CONDUCT

At Home Grown Hotels we are dedicated to the million details, from the produce we source to the people we work with. We work with suppliers who uphold our high standards of quality, service and ethics.

Scope and application

This Supplier Code of Conduct sets out the minimum standards we expect from all our suppliers. It is intended to protect the interests of Home Grown Hotels Limited and its parent, subsidiary, and affiliated group companies, including The Pig Hotel Group Limited. The Code sets out our expectations in areas such as labour and human rights, health and safety, ethical business practices and environmental responsibility.

We seek to work with suppliers who not only comply with the law but also share our dedication to doing things the right way. Suppliers are expected to comply with all applicable laws, such as the UK Modern Slavery Act 2015, and, where the provision of law and this Supplier Code address the same subject, to apply the provision that affords the greater protection.

Demonstration of Compliance

Acknowledgement of this Supplier Code is a pre-requisite in every contract for supply. By signing a supply contract, accepting a purchase order, or continuing to provide goods or services to Home Grown Hotels in the absence of a formal agreement, the supplier confirms its commitment to comply with the provisions of this Supplier Code. Suppliers must be able to demonstrate their compliance upon request and to the satisfaction of Home Grown Hotels.

Suppliers who engage subcontractors, sub-suppliers, or other third parties in the delivery of goods or services to Home Grown Hotels are responsible for ensuring that these entities comply with the standards and requirements set out in this Supplier Code. Suppliers must take reasonable steps to communicate the expectations of this Code to all relevant third parties and must monitor their compliance.

In case Home Grown Hotels becomes aware of any actions or conditions not in compliance with this Supplier Code, we will demand corrective measures and where possible will work with suppliers to ensure they are meeting the required standards.

Home Grown Hotels reserves the right to terminate an agreement with any supplier who cannot demonstrate they comply with this Supplier Code of Conduct.

Labour and Human Rights

Modern Slavery

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect our contractors, suppliers and other business partners to work with us in identifying and addressing any areas of risk or concern, and to demonstrate their own commitment to ethical business practices.

Suppliers must comply fully with the Modern Slavery Act 2015 and all applicable anti-slavery and human trafficking laws. This includes taking proactive steps to ensure that slavery, servitude, forced or compulsory labour, and human trafficking do not occur in any part of their business or supply chains.

All work must be voluntary, and in no case should workers be mandated to relinquish government-issued identification, passports or work permits. Suppliers must also ensure that workers are not required to pay any recruitment fees or expenses as a condition of receiving work.

Suppliers are required to:

- Conduct regular risk assessments of their supply chains;
- Implement and maintain effective due diligence procedures to identify, prevent, and mitigate the risk of modern slavery; and
- Ensure that their own suppliers and subcontractors adhere to equivalent standards.

Upon request, suppliers must be prepared to provide evidence of:

- Policies and procedures addressing modern slavery;
- Steps taken to investigate and address any issues identified; and
- Staff training or awareness programmes on recognising and preventing modern slavery.

Suppliers must notify Home Grown Hotels immediately if they become aware of any actual or suspected modern slavery within their operations or supply chains. They are expected to cooperate fully with any investigations and take appropriate remedial actions.

Prohibition of Forced and Compulsory Labour

Suppliers must strictly prohibit all forms of forced labour, including prison labour, indentured labour, bonded labour, slave labour, or any other form of non-voluntary labour. Suppliers are required to have effective management systems in place to ensure compliance with these standards.

Abolition of Child Labour

Suppliers must not employ anyone under the minimum legal working age, as defined by UK law or the law of the country in which they operate, whichever sets a higher standard. Under no circumstances should suppliers engage in or support the use of child labour.

Suppliers are expected to have robust age verification procedures in place during recruitment and must take immediate corrective action if any instance of child labour is identified. Where young workers are legally employed, suppliers must ensure that their work is not harmful to their health or development and does not interfere with their education.

Fair Wages and Working Conditions

Suppliers must ensure that all working practices fully comply with applicable local labour laws and reflect a commitment to ethical and fair treatment of workers.

Suppliers must ensure that all workers are paid fair wages and receive benefits that comply at least with minimum wage legislation and other applicable wage and working time laws or collective bargaining agreements. Suppliers will not permit deductions from wages as a disciplinary measure.

Suppliers are expected to promote work-life balance and avoid exploitative labour practices under all circumstances. Workers should not be required to work more than the number of hours legally allowed for regular and overtime work periods.

Suppliers are expected to ensure that their operations are free from discrimination, harassment, or abuse of any kind. They must ensure that no threats of violence, physical punishment, confinement, or other forms of physical, sexual, psychological, or verbal harassment or abuse are used as a method of discipline or control. Suppliers will clearly define and communicate to workers the disciplinary policies and procedures in support of these requirements.

Freedom of Association and Collective Bargaining

Suppliers must respect the right of all workers to freely associate, join or not join trade unions, and engage in collective bargaining, in accordance with applicable laws. These rights must be exercised without fear of discrimination, retaliation, intimidation, or undue influence.

Health and Safety

Home Grown Hotels expects its suppliers to provide a safe and healthy work environment for their employees. At a minimum, suppliers must ensure their health and safety policies and procedures comply with all legal requirements, including the Health and Safety at Work Act 1974. Wherever these do not exist, suppliers must take steps to minimise the risk of accidents, injuries, and exposure to health hazards, applying the best practices and prevailing industry knowledge. Facilities should be subject to regular health and safety reviews, with corrective action being taken where necessary.

Ethical Business Conduct

Business Integrity

Home Grown Hotels expects its suppliers to uphold the highest standards of integrity, honesty, and transparency in all business dealings. Suppliers must operate ethically, comply with all applicable laws and regulations, hold all necessary licences and permits to perform the services/products offered, and conduct their activities in a manner that promotes trust and accountability throughout the supply chain.

Anti-Corruption, Bribery and Tax Evasion

Suppliers must comply with all applicable anti-corruption and anti-bribery laws, including but not limited to the UK Bribery Act 2010. Suppliers must not engage in, or tolerate, corruption such as bribery or any form of improper or unlawful payment under any circumstances including financial fraud, money laundering, extortion or facilitation payments. Suppliers are required to implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws. In addition, all suppliers must comply with Home Grown Hotels' **Anti-Corruption Policy for Suppliers**, which is available [here](#).

Home Grown Hotels does not tolerate tax evasion or the criminal facilitation of tax evasion within its business and expects all Suppliers to conduct themselves in accordance with this principle. Suppliers must comply with all applicable tax laws and regulations and must not engage in, facilitate, or fail to prevent tax evasion or the facilitation of tax evasion, in accordance with the UK Criminal Finances Act 2017. Suppliers are expected to have reasonable procedures in place to prevent tax evasion within their own operations and across their supply chains. In addition, all suppliers must comply with Home Grown Hotels' **Anti-Facilitation of Tax Evasion Policy for Suppliers**, available [here](#).

Conflicts of Interest

Suppliers must avoid any actual or perceived conflicts of interest in their dealings with Home Grown Hotels. A conflict of interest arises when personal, financial, or other relationships could improperly influence or appear to influence business decisions. Suppliers must disclose any situation that may give rise to a conflict of interest to Home Grown Hotels promptly.

Gifts and Hospitality

Suppliers must not offer, give, or receive any gifts, entertainment, or hospitality that could improperly influence, or appear to influence, a business decision or create a sense of obligation. Modest, customary business courtesies may be acceptable if they are lawful, infrequent, and transparent. Any form of bribery or attempt to secure an unfair advantage through personal gain is strictly prohibited.

Employees of Home Grown Hotels may not accept gifts of money under any circumstances, nor may they solicit or accept non-monetary gifts or any other personal benefit or favour of any kind from Suppliers. Any gifts or hospitality provided by Suppliers must not be intended to influence or sway business decisions or create a conflict of interest. Suppliers are expected to ensure that any gifts given are modest in value and do not compromise, or appear to compromise, the integrity of the decision-making process.

Confidentiality and Data Protection

Suppliers must protect all confidential information received from Home Grown Hotels and use it solely for legitimate business purposes. This includes taking appropriate measures to prevent unauthorised access, disclosure, or misuse of such information. In handling any personal data relating to Home Grown Hotels, its employees, or customers, suppliers must comply with all

applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Cybersecurity and Information Safeguards

Suppliers must implement and maintain robust information security and cybersecurity safeguards to protect the confidentiality, integrity, and availability of data related to their business with Home Grown Hotels. This includes, but is not limited to:

- Maintaining up-to-date security protocols, including firewalls, encryption, and access controls;
- Ensuring all systems are regularly updated and patched to mitigate vulnerabilities;
- Implementing appropriate measures to detect, prevent, and respond to cybersecurity incidents;
- Ensuring that any personnel handling Home Grown Hotel's data are trained in data security and privacy obligations.

Suppliers must also ensure that any third parties or subcontractors involved in delivering services or handling data on their behalf maintain equivalent cybersecurity safeguards.

In the event of a cybersecurity incident or data breach that affects Home Grown Hotel's data or systems, Suppliers are required to notify Home Grown Hotels in writing as soon as possible and in any event within 48 hours of becoming aware of the incident. Such notification must include, at a minimum, a description of the nature of the breach, the data or systems impacted, and the remedial actions being taken.

Home Grown Hotels reserves the right to assess or request evidence of a supplier's cybersecurity practices as part of its due diligence or ongoing compliance monitoring.

Transparency and Traceability

Suppliers are expected to maintain accurate records and provide transparency regarding the origin of goods and materials supplied to Home Grown Hotels. Upon request, suppliers must be able to demonstrate the traceability of their products and the ethical practices of their own supply chains, including efforts to prevent illegal, unethical, or exploitative sourcing.

Sustainability and Compliance

Environmental Sustainability

Home Grown Hotels is committed to minimising its environmental impact and expects its suppliers to operate in a manner that actively supports environmental sustainability. Suppliers must comply with all applicable environmental laws and regulations and take proactive steps to reduce their environmental footprint across all aspects of their business.

Suppliers are expected to monitor and manage their use of natural resources responsibly, including energy, water, and raw materials, and to minimise waste and emissions wherever possible. This

includes implementing measures to reduce greenhouse gas emissions, avoid pollution, and promote the use of sustainable materials and packaging.

Suppliers should adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labelling for recycling and disposal of such substances. Suppliers should identify and manage hazardous materials to ensure their safe handling, storage, recycling, reuse or disposal in such a way as not to harm the environment.

Certifications and Supplier Cooperation

Home Grown Hotels may from time to time hold third-party certifications that recognise its commitment to upholding the highest standards of social, environmental, and economic sustainability, such as B Corp certification and the Food Made Good Standard. Our relationships with suppliers play a critical role in achieving and maintaining these certifications.

Suppliers may be required to respond to information requests or participate in compliance monitoring activities initiated by Home Grown Hotels, including audits, assessments, or other forms of due diligence, as needed to meet the standards required by our certification bodies. In cases of non-compliance, we will seek to work collaboratively with suppliers to implement remedial actions.

Contact us

For questions, concerns, or to report a breach of this Code of Conduct, suppliers should contact their primary business contact at Home Grown Hotels or refer the matter to a member of the senior management team.