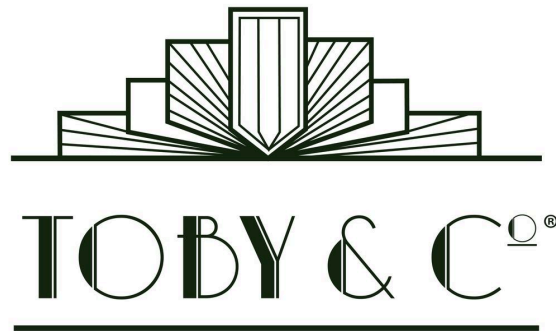




## **Toby&Co Beverages Ltd**

### **Ethical Business Code of Conduct, Anti-Slavery & Fair Recruitment Policy (Summary)**

#### **Our Commitment**

At **Toby&Co Beverages Ltd**, we believe that great products should be created through **ethical, responsible, and respectful business practices**. We are committed to operating with integrity, protecting human rights, supporting fair employment, and building responsible relationships with employees, suppliers, partners, and customers.

Our approach is guided by internationally recognised principles including the **UN Guiding Principles on Business and Human Rights** and the **UK Modern Slavery Act 2015**.

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## **1. Ethical Business Code of Conduct**

### **Integrity and Responsible Business**

Toby&Co Beverages Ltd conducts business honestly, transparently, and responsibly. We expect all employees, contractors, and suppliers to operate with integrity and comply with applicable laws and regulations.

Our business practices are guided by the following principles:

- Acting honestly and transparently in all dealings

- Avoiding conflicts of interest
- Rejecting bribery, corruption, and unethical payments
- Maintaining accurate records and responsible financial reporting
- Treating all stakeholders with respect and fairness

We promote a workplace culture where ethical behaviour is recognised, encouraged, and supported.

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## 2. Respect for Human Rights

We respect the dignity and rights of every individual connected to our business.

Toby&Co Beverages Ltd supports the principles of:

- Fair and safe working conditions
- Respectful treatment of all workers
- Freedom from discrimination, harassment, or intimidation
- Equal opportunity for employment and advancement

We strive to create a workplace where all individuals feel **valued, safe, and empowered to contribute**.

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## 3. Anti-Slavery and Human Trafficking

Toby&Co Beverages Ltd maintains **zero tolerance for modern slavery, forced labour, or human trafficking** in any part of our operations or supply chain.

We are committed to:

- Preventing forced, bonded, or involuntary labour
- Ensuring workers are employed freely and can leave employment with reasonable notice
- Prohibiting the retention of personal identity documents
- Ensuring workers are not required to pay recruitment fees
- Conducting business only with suppliers who share these principles

We work to identify and mitigate risks of modern slavery within our operations and supply chains and encourage transparent communication from all partners.

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#### 4. Fair Recruitment Practices

We believe recruitment should always be **fair, transparent, and ethical**.

Our recruitment principles include:

- Hiring based on merit, skills, and potential
- Providing clear and accurate job information
- Ensuring employment terms are communicated clearly before employment begins
- Ensuring workers do not pay recruitment fees
- Protecting workers' right to understand contracts and employment conditions

We aim to ensure that all workers are recruited in a manner that respects their rights and dignity.

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#### 5. Fair Employment and HR Practices

Toby&Co Beverages Ltd is committed to providing **fair and supportive working conditions** for all employees.

Our employment principles include:

##### **Fair Pay**

Employees receive fair and lawful wages in accordance with applicable labour laws.

##### **Working Hours**

Working hours, overtime, and rest periods comply with legal standards and promote employee wellbeing.

##### **Safe Workplace**

We provide a working environment that prioritises **health, safety, and wellbeing**.

##### **Non-Discrimination**

We are committed to equality and do not tolerate discrimination based on:

- Gender
- Age
- Ethnicity
- Disability
- Sexual orientation
- Any other protected characteristic

## **Respectful Workplace**

Harassment, bullying, or intimidation are not tolerated in any form.

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## **6. Responsible Supply Chain**

Toby&Co Beverages Ltd expects suppliers and business partners to share our commitment to ethical conduct.

We encourage suppliers to:

- Comply with labour laws and human rights standards
- Prohibit forced labour and child labour
- Provide safe and fair working conditions
- Operate responsibly and ethically

Where possible, we seek to build partnerships with suppliers who demonstrate strong ethical and social responsibility practices.

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## **7. Speaking Up and Reporting Concerns**

Toby&Co Beverages Ltd encourages employees, suppliers, and partners to raise concerns about unethical behaviour or potential violations of this policy.

Concerns may relate to:

- Human rights violations
- Modern slavery risks
- Unfair recruitment practices
- Workplace misconduct
- Illegal or unethical activity

Reports will be treated **seriously, confidentially, and without retaliation.**

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## **8. Continuous Improvement**

We recognise that ethical business practices require ongoing commitment. Toby&Co Beverages Ltd is dedicated to:

- Reviewing policies regularly
  - Improving supply chain transparency
  - Promoting ethical awareness among employees and partners
  - Strengthening responsible business practices as the company grows
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### **Approved by:**

Management – Toby&Co Beverages Ltd - Signed by Tobias Gorn Founder and CEO -

A handwritten signature in black ink, appearing to be 'TG', enclosed within a circular scribble.

03/07/2026

**Policy Review Cycle:** Annually