

	ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) POLICY		P-DG-02
	EDITION NO. 2	VALID FROM 22/05/2017	

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1. Introduction

Dr Gerard is one of the largest producers of biscuit and wafer products in Poland. Our success is based on the high quality and wide range of products appreciated by our consumers. We recognise that our activities, and those of our suppliers, have environmental and social impacts which can materialise into both risks and opportunities for our business, and we need to actively manage these to help maintain our competitive advantage.

Whilst our top priority is to focus on legal compliance with regulations relating to environment, social and governance issues, we will also strive to continuously improve our performance in relation to our material ESG issues, as set out in the sections below.

2. Elements of ESG Policy

2.1 Environment

We are committed to minimising the environmental impact of our activities, through compliance with environmental legislation, minimising consumption of natural resources and wastage of materials as far as economically possible, and raising awareness of environmental issues amongst our employees and suppliers. We will focus on the areas we consider to be our key environmental impacts: energy consumption and associated greenhouse gas emissions from our manufacturing sites, greenhouse gas emissions from our transport / distribution network, the use of packaging materials and the production of waste. We will:

- Monitor energy consumption from our manufacturing sites, with a view to reducing consumption (and the associated greenhouse gas emissions) once the baseline has been established
- Continue to explore the potential for redesigning / re-engineering our packaging materials, to further reduce the amount used for our products
- Monitor the amount of packaging waste generated, and consider how this can be minimised

2.2 Social

Our employees. Providing a safe and healthy working environment for all of our employees and contractors is of primary importance to Dr Gerard. We will continue to provide health and safety training for all employees as part of the induction process and then subsequently on a periodic basis. Any incidents are investigated thoroughly, monitored and reported to the Board on a monthly basis.

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Our business partners. We acknowledge the impact of our operations along the full length of our chain, and a key part of this relates to the social and environmental impacts of our suppliers. We are responding to this through the inclusion of ESG screening as part of our supplier auditing process.

Our customers. The success of our products depends on their high quality and taste. Without compromising these qualities, we are actively exploring opportunities to make our products healthier for our consumers.

Our communities. We are one of the leading employers of local people within the communities in which we operate, and we will continue to provide additional support to our communities.

2.3 Governance

We are committed to implementing strong governance procedures, to ensure we carry out our business in a manner that protects our own interests and those of all our stakeholders. Quality and food safety are critical issues for us, and to help ensure that our operations are carried out to the highest standards our main manufacturing sites are certified to the following standards:

- BRC Food Safety Standard
- IFS Food Standard

We will carry out internal audits on a periodic basis as part of our quality assurance process, and we will also audit our suppliers to ensure food safety and traceability, both at the pre-qualification stage for new suppliers and periodically for existing suppliers.

We will develop and implement an anti-bribery and corruption policy, and will consider any additional safeguards required to support this policy. Our Supervisory Board will provide oversight on the progress of the ESG initiatives, and they will be provided with regular progress updates from our management team.

2.4 Organisational Arrangements / Roles and Responsibilities

Responsibilities for managing ESG issues are divided between a number of departments, including quality control, procurement, health and safety and logistic. These ESG responsibilities are coordinated by our Quality Assurance Manager, who reports directly to the Chief Executive Officer. We also recognise that effective management of our ESG issues requires commitment from all levels of our business, and all our employees are responsible for adherence to the principles set out in this policy.

2.5 Arrangements for monitoring and reporting

We recognise the importance of monitoring and reporting on our key ESG issues as an important step towards effectively managing these issues. To this end, we have developed a set of key performance indicators (KPIs) in relation to our key ESG issues, and will be monitored and reported internally on a regular basis.

This policy will be reviewed at least annually and updated as appropriate.

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3. History of changes

- This Policy replaces the Policy dated March 2014.
- Information about ISO norms has been deleted.
- The policy was prepared in two language versions: Polish and English.

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