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Section 1: Introduction to the Code of Practice

1.1 Background

Dri-Pak is committed to providing quality products to its customers as part of its business strategy.

This Code of Practice represents Dri-Pak's specific requirements in addition to, where relevant, those found within the BRC Global Standard for Food Safety and Consumer Products Personal Care and Household, or individual customer standards.

If you wish to obtain a copy of the relevant BRC standards, please use the following web site:

www.brc.org.uk

It is the supplier's responsibility to ensure compliance, where relevant, with the most recent edition of the 3rd party or customer standards and Dri-Pak's Code of Practice.

All raw materials supplied to Dri-Pak must comply with relevant EU Legislation and legislation applicable within the country of origin, manufacture and the country the material is being supplied to. Consideration should also be given to relevant codes of practice, guidance documents and chemical standards such as Registration, Evaluation, Authorisation and restriction of Chemicals (UK REACH) and European Chemical Agency (ECHA).

Dri-Pak expect suppliers to have a programme of "continuous improvement". Regular supplier reviews will take place which may include routine audits, a review of audit non-conformances, documentation including specifications and supplier complaints as appropriate.

These audits may be a full inspection of manufacturing standards against Dri-Pak's requirements, an assessment of product integrity and traceability, inspections of storage and distribution standards, or other specific audits because of concerns raised relating to the supplier.

We reserve the right to make unannounced visits to our suppliers.

1.2 Dri-Pak Company Contact List
Contact details given below are correct as of 1st January 2026.

If you are unable to contact those listed below, please contact our head office who will direct your enquiry as appropriate.

Robert Fenton
Group Managing Director

Graham Hay
Group Finance Director

Richard Hazel
Group Quality Manager
Tel: 01543 624284

John Brady
Production Manager
Tel: 01159 325165

Catherine Mui
Quality Systems Coordinator
Tel: 01159 325165

Claire Hindley
Group Finance Manager
Tel: 0161 371 5585

Section 2: Supplier and Material Approval

Dri-Pak require that all suppliers of finished products, chemicals, packaging, and storage and distribution achieve an appropriate BRC certification or other equivalent certification. The scope of this certification must cover the product or service supplied.

Agents and Brokers are expected to achieve and maintain the BRC standard or other recognised certification.

If a supplier is subject to decertification or drops a certification grade (e.g. from BRCGS Grade A to C) then Dri-Pak must be informed immediately.

Concessions may be given in certain circumstances which will be agreed on an individual basis by our Group Quality Manager.

a. The manufacturer / processor / packer is working towards certification, and it is achieved within an agreed timescale.
b. Certification of the supplier / distributor rather than the manufacturer / processor / packer may be accepted where further processing is intended by Dri-Pak.

Samples requested should be sent in the same packaging format as the intended supply format. Samples should be clearly addressed to the person who requested the sample and accompanied by a specification and safety data sheet (where applicable).

The Group Quality Manager or delegate may carry out an approval audit. Requirements are based on risk and will be discussed on an individual basis. The audit will include an assessment of Ethical standards including Supervisory behaviours, staff facilities and health & safety concerns.

As part of the approval process all suppliers will be requested to submit relevant documentation for review including, but not limited to:

- Completed Dri-Pak Supplier Self-Assessment Questionnaire
- HACCP Plan & Flow Diagram
- TACCP / VACCP or other vulnerability assessment
- Copy of a recent Ethical Compliance Audit
- Product or service specification
- Environmental & Ethical Trading Questionnaire

Document review is a critical part of our process. Errors and omissions in documentation delay the approval process which inevitably disadvantages both our businesses.

Suppliers must be members of SEDEX: trading relationships must be set up and visibility allowed for every supplying site. Suppliers may be approved prior to initiation of SEDEX membership with the strict proviso that membership is gained and subsequently maintained. Where supplying sites are high risk, they will be required to provide evidence of ethical compliance, this will be through SEDEX and / or by providing a copy of a recent (< 3 years old) Ethical Report.

Suppliers must be able to demonstrate that they have exercised all due diligence and reasonable precautions to ensure that they are working at the highest achievable standard and are striving for continuous improvement of standards. Material detail will be agreed by both supplier and Dri-Pak as part of the specification approval process.

New suppliers will be given a three-month trial period, during which an assessment will be made to assess suitability of continued supply. Should the supplier not meet the requirements they will be notified giving a further period for improvement, usually three months. Should improvement criteria still not be met within this time, termination of the approved supplier status will be initiated.

Any changes to any part of the materials supplied (including site of manufacture / processing / packing product composition raw materials, product process etc.), must be notified to our Group Quality Manager for review and agreement prior to the changes taking place. Any suppliers which are found to have failed to communicate changes will be subject to termination of supply.

Approved practices and risk management via a robust HACCP plan (or similar risk management process) shall operate at all stages of sourcing, manufacturing, storage, and transportation and be comparable to the guidelines in CODEX ALIMENTARIUS.

For all chemicals a Safety Data Sheet must be supplied.

All materials supplied to Dri-Pak must be fully traceable within a time frame that allows for appropriate actions to take place that effectively minimise any associated supply chain, consumer safety, legal compliance or operational risk. Dri-Pak requires a minimum traceability standard that meets the EU legislation. Vendors must be capable of demonstrating the robustness of their traceability systems.

All our suppliers are expected to meet with the highest standards in their businesses practices and as such will be required to have their own businesses registered on SEDEX.

Agents are expected to ensure the registration of all manufacturing sites supplying into Dri-Pak on SEDEX.

Section 3: Specific Requirements

3.1 Shelf Life

A shelf-life protocol for materials, when necessary, should be designed to verify a best before date of at least three years to protect the consistency and safety of the products.

3.2 Physical Standards

Physical standards apply to general defects (Clumping, discolouration etc.), intrinsic and extrinsic foreign bodies.

The Dri-Pak objective is to achieve zero defects and foreign bodies.

3.3 Authenticity

Suppliers must have specific documentation within their quality management systems relating to product authenticity controls. This includes but is not limited to the following specifically related to product authenticity.

- Hazard analysis and risk assessment including TACCP and VACCP assessments.
  (NOTE: Risk assessments relating to product authenticity should focus on the likelihood of cross-contamination as well as intentional substitution. Due consideration should be given to whether the presence of additional chemicals and their risk, as well as any other products processed by the supplier and their suppliers).
- Identification of specific pre-requisite programmes and CCPs.
- Identification of critical limits
- Identification of monitoring requirements
- Corrective actions
- Verification that the system is working
- Retention of records and monitoring of the system

3.4 Supply Chain Visibility

Visibility of the supply chain must be provided for every raw material supplied to Dri-Pak. Where compound materials contain two or more ingredients, separate information must be provided for every ingredient. This information must include as a minimum:

- An overview of the supply chain for the materials being supplied indicating all links of the chain to the point prior to Dri-Pak.
- An explanation of the business type at each point in the supply chain, including, but not limited to:
  - Agents
  - Distributors
  - Packers
  - Processors

    - Shippers
- Traceability documentation based on a specific batch or product which demonstrates the ability to track the material back to the point prior to Dri-Pak supply back to the very first point in the supply chain provided in the supply chain overview given.

3.5 Supplier Approval

Materials will only be accepted into Dri-Pak from approved suppliers. Supplier approval is based on several factors including the acceptable fulfilment of this Code of Practice, and in addition to the Dri-Pak supplier quality assurance standard.

3.6 Traceability

Full traceability and mass balance of the materials supplied must be available back to source within 4 hours of the request. Due to time differences this requirement is extended to 24 hours for non-European suppliers.

A supplier's ability to complete full traceability and mass balance of materials back to primary source will be challenged as part of the Supplier Quality Assurance audit programme.

Section 4: Supplier Monitoring

4.1 Certificate of Authenticity (COA)

Where an agreement exists between Dri-Pak and the supplier to provide a COA, the certificate must be provided either with the delivery, addressed to the nominated department at the receiving factory, or be electronic mail to the same department prior to delivery. Where testing timescales and the material shelf life dictate that the certificate is not available until after the material is delivered to Dri-Pak, local agreements must be in place with the receiving plant to receive the COA after delivery.

The following information must be included in the COA:

- Material name
- Manufacturer’s name
- Manufacturer's batch number(s)
- Date of manufacture
- Expiry date and / or shelf life
- Physical / Chemical results as indicated in the compliance section of the individual material specifications
- Signature and date of approval (Digital signatures are permitted)
- Any additional local requirements will be detailed in the individual material specifications

The following additional information is preferred but not mandatory:

- Purchase order number
- Delivery date

4.2 Record Management Compliance

All records that demonstrate material compliance to an approved specification must be maintained for a reasonable period to allow for documents to be produced in the event of litigation or a government investigation.

4.3 Change Control

No significant change in the formulation / source / packaging or process of materials shall be made without prior notice being given, in writing, to Dri-Pak.

Any changes to the facility / location of manufacturing must be communicated and agreed with Dri-Pak prior to the first delivery.

The vendor must have systems in place to assess the significance and impact of the changes before implementation.

Changes must not impact on the compliance to the specification, without prior written agreement from Dri-Pak.

4.4 Auditing, Certification, and Verification

Non-GFSI accredited suppliers of materials will receive an onsite audit by Dri-Pak on a risk assessed basis, but no longer than:

High Risk	Every 18 Months
Medium Risk	Every 3 Years
Low Risk	Self-assessment / Audit as and when required

This audit will verify that the requirements of this code of practice are being met and identify any non-conformances accordingly.

Dri-Pak recognise that third party verification and or / process certification against an independent standard or criteria offers increased due diligence and protection to our brand.

4.5 Contracts

Formal contract for supply must be in place for all links identified in the supply chain overview provided for the materials supplied.

Contracts between the supplier to Dri-Pak and their suppliers must be available on request.

Evidence that the supplier has verified that contracts are in place for all other links in the supply chain must be available on request.

4.6 Traceability

Full traceability and mass balance of materials back to primary source will be challenged as part of the Supplier Quality Assurance audit programme. Suppliers may be requested to participate in recall challenge scenarios undertaken by Dri-Pak.

Section 5: Packaging and Labelling

5.1 Product Packaging
Packaging should be suitable to protect the product from contamination and damage during storage and distribution. All packaging details including wording and layout must be included within the specification for approval by Dri-Pak.

Primary packaging should be fully sealed and labelled wherever possible. Tamper Evident packaging must be used if requested by Dri-Pak, details of which should be recorded on the specification.

All packaging material shall comply with EU legislation.

5.2 Pack Weight
All packs should be delivered to the weight agreed within the specification.

5.3 Fit for Purpose
All packaging material shall be clean, undamaged, robust, and fit for the purpose so that during handling and opening it does not lead to spillage or cause contamination of the materials.

5.4 Drums
Drums must not have sharp edges or show any evidence of flaking paint or rust.

Second hand drums are only acceptable by prior agreement. Drums must be palletised with correct transport information and the requirements of the individual chemical specification.

5.5 Bulk Bins
When the Dri-Pak preferred packaging option is 1200kg (300 gallon) bins, the supplier shall be advised and the specification for the design and standards shall be agreed between the supplier and Dri-Pak.

5.6 Flexible Bulk Containers (FBCs)
FBC's used for the delivery of materials should be manufactured from woven polypropylene, of a design approved by Dri-Pak. Bags must be stitched in such a way that all securing strings do not come loose on opening. Bags with loose strands of polypropylene fibres or poor stitching are not acceptable.

5.7 Prohibited Materials
Primary packaging shall not contain components that could contaminate the product on opening of the packaging. Examples include staples, wires, tags, loose ties, plastic, rubber or metal closures, loose paper labels, string, rubber bands and tape.

Secondary packaging shall not contain components that could contaminate the product on opening of the packaging. Examples include staples, wires, transparent tape, string, rubber closures, patent fastenings, tags, loose ties, loose paper labels, plastic or metal closures.

Tamper evident devices are acceptable on secondary packaging only with explicit approval in writing of Dri-Pak.

Secondary packaging must be designed to be opened without damaging the primary packaging or contaminating the product.

5.8 Pack Label
Unless permitted by exception in the material specification each package must be clearly marked legibly in bold lettering in English for the receiving Dri-Pak facility, to show, as a minimum:

- Supplier and Manufacturer identification
- Material name
- Chemical number if applicable
- Net weight
- Batch code and production date
- Best Before Date

5.9 Pallets
Pallets must have four-way entry and be suitable for warehousing in racks. Wooden pallets shall comply with European Legislation. Pallets must be clean, dry and of sound construction, free from damage, splinters, raised nails, and moulds.

5.10 Palletisation
Pallets should be made up of one batch code only, if this is not possible, prior approval must be sought from Dri-Pak. Pallet loads should not overhang the pallet. A maximum pallet height of 1.35m shall not be exceeded. A maximum pallet weight of 1,000kg shall not be exceeded unless agreed by Dri-Pak.

5.11 Pallet Labels
Palletised product / packaging shall carry identification labels securely fixed to the top left of two adjoining sides. The label must be clearly marked in bold lettering to show, as a minimum:

- Supplier and Manufacturer identification
- Material name
- Material number
- Net weight
- Batch code and production date

Section 6: Transport and Delivery

Deliveries are only accepted between the hours of 07:00 and 14:00 unless authorised under exceptional circumstances. All deliveries must be booked in advance by calling 01159 325165. You will be asked the following prior to being allocated a delivery time:

- Purchase order number
- Haulier name
- Supplier name
- Product
- Number of pallets / containers

Late deliveries must always be notified at the earliest opportunity and off-loading maybe delayed depending on activities and other deliveries taking place. Deliveries without prior booking may be delayed or rejected.

Service levels based on adherence to the booking procedure, on time and accurate deliveries will be monitored and used as part of our continuous supplier assessment.

Transport must be suitable, clean, hygienic, pest free, and free from residues of previous loads.

Materials must be adequately protected to prevent transit damage, spillage on pallet or deterioration from any reason.

If it has been determined on inspection of a delivery that product contamination or damage has taken place, product may be rejected. Rejected deliveries will not be accepted and must be shipped back immediately via the supplier’s own carrier or third-party transport. Dri-Pak will not be liable for any transport costs incurred where a rejection has taken place. This condition does not apply to third-party hauliers contracted to Dri-Pak.

Bulk transport of materials must only be carried out in designated transport vehicles and equipment that may encounter the product during delivery and transportation shall be free from any contaminating material. Tamper evident seals must protect all valves, hoses and hatches or other means of access. A Dri-Pak operator must witness the breaking of the seal immediately before discharge.

To eliminate the risk of contamination in bulk deliveries, any bulk container or reuseable bulk packaging shall be dedicated only for use with the specific ingredient supplied to Dri-Pak, or shall be subjected to a robust cleaning regime, validated to confirm removal of residues.

Delivery documentation must accompany each delivery.

The following delivery information must be provided either in paper or electronic form:

- Material name
- Account number
- Manufacturer’s name
- Manufacturer’s material code
- Purchase order number
- Quantity delivered
- Manufacturer's batch number(s)
- Date of manufacture
- Expiry date(s)

Section 7: Environment and Sustainability

Dri-Pak is committed to continually improving its environmental performance and aims to do so by:

- Progressively integrating environmental considerations into all our business decision and activities.
- Having in place and annually reviewing an Environmental Management System (EMS)

Dri-Pak are in the process of setting objectives and targets which will be monitored and reviewed though our environmental management system. Dri-Pak will promote environmental responsibility and improved environmental performance among our suppliers.

Section 8: Ethical Policy, Modern Slavery, and Site Standards

8.1 Ethical Policy

Dri-Pak is committed to implementing a strong ethical policy for all its branded products. We recognize our responsibility to discourage the exploitation of people, whether directly or indirectly, who contribute to our business. We support the principles of the "Ethical Trading Initiative Base Code" and we are a registered SEDEX member.

All our suppliers are expected to meet with the highest international standards in their business practices and as such will be required to have their own businesses registered on SEDEX.

Agents are expected to ensure the registration of all manufacturing sites supplying into Dri-Pak on SEDEX.

We acknowledge that employment cultures vary worldwide, and we consider it appropriate the assessment of our suppliers takes this into account, as we source our products globally. We will work with our suppliers to improve their practices were deemed necessary.

We look to ensure that the following fundamental codes are practiced by our suppliers:

- Employment is freely chosen
- Employees' rights are respected in terms of freedom of association and the right of collective bargaining.
- Working conditions for all employees are safe and hygienic.
- There is no forced child labour.
- Living wages are paid to employees.
- There is no discrimination practiced particularly in respect of ethnic origin, religion, age, disability, gender, sexual orientation, or political affiliation.
- Regular employment is provided.
- There are no practices of harsh or inhuman treatment of employees.
- Compliance with immigration laws.

All suppliers, agents and manufacturing sites used are expected to complete the SEDEX self-assessment questionnaire. Any changes to the information submitted on SEDEX must be communicated to Dri-Pak immediately.

8.2 Modern Slavery

Dri-Pak is committed to limiting the risk of modern slavery occurring within our own business, infiltrating our supply chains, or any other business relationship. Our Modern Slavery Policy incorporated into this Code of Practice applies to all persons working for, or on behalf of, in any capacity, including employees, directors, agency workers, contractors, and consultants.

We expect all who have, or seek to have, a business relationship with the company to familiarise themselves with the Modern Slavery Contents of this Code of Practice and to always act in a way that is consistent with its values.

We will only do business with organisations who fully comply with this policy or those who are taking verifiable steps towards compliance.

This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA)

What do we mean by modern slavery?

Modern slavery can take many forms. It is complex and multi-faceted problem. The MSA covers four key criminal activities:

- Slavery: Where ownership is exercised over an individual
- Servitude: Involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under threat of force or penalty.
- Human trafficking: Involves arranging or facilitating the travel of another with a view to exploiting them.

All forms of modern slavery have in common the deprivation of a person's liberty by another to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspects of our business.

How we seek to embed our anti-slavery policy in practice?

To underpin our policy commitments, we are in the process of implementing the following measures:

- We will conduct regular risk assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery.
- Where appropriate, as informed by our risk management, we will engage directly with suppliers to ensure modern slavery is not occurring within their businesses and supply chains, and where appropriate, agree how measures should be enhanced.

- Any new suppliers will be subject to pre-screening as part of our tender process in relation to the effectiveness of their existing safeguarding controls and practices including but not limited to those in relation to preventing modern slavery occurring within their organisation and within their own supply chain.
- Our contractual documentation includes specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and the use of child labour in line with this policy. We also make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.

Communication and employee awareness training
Suppliers are required to ensure the requirements of this policy, or their own modern slavery policy, are effectively communicated to all staff within the business, to assist them in appreciating the extent of the problem of modern slavery and identify individuals / areas of the business that may be at risk. Suppliers are required to have some form of confidential whistleblowing system or scheme in place to allow staff to report issues relating to their working environment in a safe and secure way via phone, web, or email etc.

Breaches of this policy
Any breaches of this policy will be taken seriously and delt with on a case-by-case basis.

Everybody to whom this policy applies will be expected to fully co-operate in any investigation into suspected breaches of this policy or any related processes or procedures.

Status of this policy
This anti-slavery policy will be reviewed by the company’s board of directors on an annual basis.

8.3 Site Standards

Site
The site should be designed and maintained to ensure that production of products is carried out following good manufacturing practices, which include, but are not limited to:

- Limitation of cross contamination
- Facilitation of effective cleaning
- Cleaning regime in place
- Effective pest control

Plant Maintenance
Suppliers should be able to demonstrate due diligence through a planned preventative maintenance system for plant to ensure that materials supplied to Dri-Pak are not at risk from either the premises or equipment. For critical equipment a programme of validation and verification should be in place. Should

Dri-Pak consider a more stringent maintenance regime is appropriate for a particular range of process equipment this will be discussed and agreed with the supplier.

Plant Equipment
Suppliers should ensure that all equipment being used is fit for purpose, included in this scope but not limited to hygienically designed, calibrated etc. When requested documentation should be provided to Dri-Pak to demonstrate compliance with EU regulations.

Section 9: Non-conformance, Complaints, and Recall Procedures

9.1 Non-conforming and Excess Branded Product

Under no circumstances must any Dri-Pak brand (or brand of our customer's) be sold or provided to any third party. If stock has been rejected / is excess stock, you must ensure that it is disposed of in an appropriate manner and in a way that will not be harmful to Dri-Pak's reputation. Product must be physically removed from packaging bearing any reference to Dri-Pak (or brand of one of our customer's). Obscuring the brand or defacing the packaging is not sufficient. Evidence of disposal of products will be required.

9.2 Product Quality Complaints Procedure

An investigation must be started as soon as possible. All complaints must be responded to in writing with results of the investigation and action to be taken to prevent the problem reoccurring. Responses should be received by our Quality Department within 14 days unless by prior agreement. Additional time will be given when waiting for independent analysis results to be obtained, or where the complaint is of a serious nature and extensive investigation is required.

Where costs have been incurred by Dri-Pak due to poor quality or lack of supply, such as downtime, labour costs due to manual sorting, or finished product not meeting minimum specifications etc, the associated costs will be charged to the supplier as per "Dri-Pak's standard Terms and Conditions of purchase" a copy of which is available on request.

9.3 Product Recall or Withdrawal Procedure

In the event of a product recall or withdrawal, the Quality Department must be contacted immediately by telephone. Contact details are given in section 2 of this document.

Following verbal instructions, confirmation in writing must be emailed immediately to the Quality Department. Investigation and charging will be as per the Product Quality Complaints Procedure above.

The company will be required to demonstrate their business continuity plans.

9.4 Indemnity and Insurance

Proof must be provided in the form of a copy of a valid insurance policy which covers any issues identified relating to the authenticity of a product. The policy must provide for a minimum of £5 million per single claim. This insurance policy must remain in place for the duration of any contract for supply with Dri-Pak.

Appendix

Definitions

Agent: A business that purchases and or sells products but who does not take physical possession of the product.

Business Continuity: A framework which enables an organisation to plan and respond to incidents of business interruption, to continue business operations at an acceptable predetermined level.

Control Measure: Any action or activity that can be used to prevent or eliminate a material safety hazard or reduce it to acceptable levels.

CoP: Code of practice.

Cross Contamination: The presence of a chemical, whether intentionally present or due to cross contamination, which is not specifically identified within the most up to date and approved specification held by Dri-Pak.

HACCP: A system that identifies, evaluates, and controls hazards which are significant to product safety.

Incident: An event that has occurred which results in the production or supply of unsafe illegal or non-conforming product.

Internal audit: The general process of audit, for all the activity of the company. Conducted or on behalf of the company for internal purposes.

Nonconformity: The non-fulfilment of a specified safety, legal or quality requirement or a specified system requirement.

Primary packaging: Packaging which is in direct contact with the materials.

Procedure: An agreed method of carrying out an activity or process which is implemented in the form of details instruction or process description.

Product Authenticity: The attributes, characteristics, documentation, and other evidence that demonstrates that a product is what it is claimed to be.

Product recall: Any measure aimed at achieving the return of an unfit product from customers and final consumers.

Product withdrawal: Any measure aimed at achieving the return of an unfit product from customers but not final consumers.

Provenance: The origin or the source of the raw material.

Quantity check / mass balance: A reconciliation of the amount of incoming raw material against the amount used in the resulting finished products, also considering process waste and rework.

Risk assessment: The identification, evaluation, and estimation of the levels of risk involved in process to determine an appropriate control process.

Spot Buying: Purchase of products from unapproved and / or uncontrolled sources.

Dri-Pak Specification: The most recent approved specification held by Dri-Pak.