

# CODE OF CONDUCT FOR FWD MEMBERSHIP

# 1. Federation of Wholesale Distributors

The Federation of Wholesale Distributors is the trade association representing food and drink wholesalers in the UK serving retailers, caterers and private businesses via cash and carry, delivery and the internet.

## 2. Functioning

Members agree to contribute actively to the functioning of the Federation by devoting time and professional resources to the Council, committees and working groups, supporting events, and responding to data requests. The persons they appoint agree to co-operate fully and keep confidential the content of discussions in which they take part, as well as support majority decisions about Federation governance made in meetings. Members will support and promote FWD and its work publically with stakeholders.

#### 3. Mutual Understanding

The Federation will give priority to reaching consensus between members and will at all times maintain a neutral position in relation to members' interests.

#### 4. Confidentiality

The working documents presented at meetings, the discussions of the committees and working groups, internal position papers and voting positions are to be regarded as confidential and shall not be communicated to or commented upon to third parties.

#### 5. Competition law

It is Federation policy to honour both the letter and the spirit of national and international competition law both when acting under the umbrella of the Federation and in private dealings between members. Members are aware of the need to remain within the strict confines of applicable competition law at all times.

Members agree to avoid any topic of conversation that could be misconstrued as anticompetitive. In Federation meetings, any member who considers that a discussion compromises that position should immediately register their concern to the minutes and leave the meeting if the discussion is not immediately terminated. Individual items of information which come to the attention of members must not be communicated to other members, except in the form of aggregated or synthesised reports. Care must be taken to ensure that such information does not compromise the Competition Law responsibilities of other members.

# 6. Ethics and responsibility

Members will conduct their activities with the utmost responsibility and integrity and will implement best practice throughout their operations, in particular in the fields of tax, environment, health, employee safety, product safety and competition law. They will, at all times, maintain the highest levels of integrity, business ethics and competitive fairness. Members declare that their operations will be conducted in full compliance with domestic, national and international regulatory requirements.

# 7. Crime and security

Members are committed to working in partnership to create safer working and trading environment by sharing information about incidents with other Members, as well best practice and innovation in crime prevention. The Federation will centrally collate information about crimes against Members' premises and vehicles in order to build an accurate picture of the level and types of crimes faced by the sector.

# 8. Duty fraud

Federation members are committed to the fight against the ongoing problem of alcohol duty fraud. They never knowingly sell alcohol on which the duty has not been paid, and will expel from their organisation any symbol retailers and buying group wholesaler members found guilty of duty fraud.

# 9. Environment

The responsible care of the environment and of natural resources are essential principles of Members' business practices. Members are acutely aware of the sector's impact on the environment and consider sustainability to be one of their top priorities. Members recognise that by improving sustainability they can significantly contribute to the betterment of the environment and boost efficiency, cut costs, engage employees and deliver a better service to customers.

## 10. Quality

Members are committed to deliver quality products to customers. They take all necessary measures to ensure product compliance with relevant legal requirements.

## 11. Autonomy

Each member company will bear full responsibility for its own strategic and operating decisions. No decision made by the Federation shall be deemed to bind a member or overcome the principle of autonomy of each member.

#### 12. Withdrawal

If a member considers that it is no longer able to comply with this Code of Conduct, that member must resign from the Federation.