



HUMAN RIGHTS POLICY

INTRODUCTION

The Company requires all employees to be aware and comply with the general rules as set out below. Failure to comply with this policy may result in action under our Disciplinary Procedure. We will review this policy periodically to ensure that it reflects appropriate standards and continues to meet our needs.

Human rights are basic rights inherent to all human beings, regardless of nationality, place of residence, gender, sexual orientation, national or ethnic origin, religion, language, or any other status.

POLICY STATEMENT

We are committed to the highest standards of business and ethical behaviour including compliance with all applicable laws and regulations, as well as company policies, practices and procedures. We respect internationally recognised Human Rights as established in the Universal Declaration on Human Rights.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We do not use child or forced labour in any of our operations or facilities. We do not tolerate any form of exploitation of children, physical punishment or abuse and we respect all applicable laws regarding minimum age for employment.

We are also 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 the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners.

We respect our employees' right to choose to join or not join a trade union.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, agency workers, seconded workers, interns, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

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RESPONSIBILITY FOR THE POLICY

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Managing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

The prevention, detection and reporting of breaches of human rights in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of breaches in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify the Managing Director, or you can report it in accordance with our Protected Disclosure Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of breaches of Human Rights, raise it with the Managing Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that a breach of human rights in whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook.

COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

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BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This policy should be read in conjunction with other company policies and procedures including:

- Equality Policy
- Dignity at Work Policy
- Ethical Trade Policy
- Employment of Young Persons

Further information regarding Human Rights can be found in the **Guiding Principle Reporting Framework** – The world’s first comprehensive guide for companies to report on how they respect human rights - www.ungpreporting.org

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