



Human Rights Policy

Overview

We are a business where our people make the difference. We recognise the need to respect and protect human rights, and are committed to treating all colleagues, in our business and across our supply chain, with dignity and respect. This is at the heart of being a trusted company that you want to work with and for.

Our Commitment

We believe we have a responsibility as an ethical business to respect and uphold human rights and that doing the right thing is the foundation of long term business success.

We believe that the most significant contribution we can make, to protect the human rights of our colleagues, is to establish and maintain a supportive culture and open working environment where people can be individuals and speak openly, within a framework that encourages inclusivity and respect.

At the heart of this are our Values:

- Inclusive
- Excelling
- Ambitious, and,
- Integrity

These are what we expect to see throughout our supply chain, and we will not accept behaviour or attitudes that compromise what we stand for. We ensure the delivery of this through

Our Actions

We have a responsibility to deliver these commitments to our stakeholders, who include our employees, suppliers, customers, consumers, shareholders and the communities in which we operate. This is achieved through our commitment to the ethical and labour standards of the ETI (Ethical Trading Initiative) Base Code ([Link](#)) and the following specific actions:

1. A Human Rights & Ethics Steering Group – this cross business leadership group meets regularly to identify risks, agree priorities and review progress and includes representative of all relevant internal functions.
2. Auditing – external auditing from customers and regulatory organisations is supported through regular internal checks and monitoring.
3. Awareness – A commitment to communication to all management levels starting with the Board to ensure full awareness of the risks and the importance of focus on this area.

4. Training – relevant training to managers and also specialist development to those centrally involved in making improvements and internal auditing.
5. Networking – through our membership of organisations including Sedex and FNET, we look to work with other suppliers and retailers to improve and be more effective.
6. Policies - we have identified some specific areas that have a direct impact on the human rights of people in our employment and in and our wider supply chain. More information about each can be found in the links below.

Policy	Impact/Relevance to human rights
Modern Slavery	Outlines our approach to combatting modern slavery, ensuring that employment is freely chosen and that neither our people nor those in our supply chain are being exploited. We update on this annually on our website.
Grievance	Ensures that every colleague has a voice and that they can confidently raise concerns without recrimination
Whistleblowing	If a colleague has a concern regarding a wrongdoing in the workplace without fear of reprisal they can contact an independent third party to voice their concerns. This is a 24/7 confidential hotline run by an independent third party – Expolink. All of the concerns are investigated.
Health & Safety	Establishes our expectations for good health and safety to ensure lives and health are not in jeopardy through working for us
Procurement	Ensures that our external supplier contracts reflect our responsibilities and commitments with regard to Human rights.
Anti-Bribery and Corruption	Sets clear standards for behaviour for all our colleagues in dealing with each other and external stakeholders

Our Supply Chain

As a vertically integrated food business, we own or manage our entire supply chain. We recognise the importance of extending our high standards and ethical requirements to our suppliers and other business partners.

We seek to develop long-term partnerships with suppliers who also share our values and commitment to high ethical standards, including improved labour and employment standards, and our framework of commitments. Details on this is contained in our Modern Slavery update 2018.

Governance

We use reporting systems in our policies to ensure that potential Human Rights issues are identified and action taken swiftly where necessary. Primarily, issues are raised with line managers, through employee forums and where necessary through our grievance and whistleblowing processes. In this way, colleagues' concerns are quickly identified and resolved.

Summary

This policy has been approved by our CEO. The People and Communications Director together with the wider Board has overall responsibility for the implementation of this policy and our framework of commitments. Our management teams receive training on human rights impacts. The above processes are open to all employees.

We remain committed to improving our standards, taking our responsibilities seriously and enhancing our reputation as a Company you want to work with and work for through our work in the area of Human Rights.

This policy will be communicated to all our stakeholders.

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Andrew Brodie

People and Communications Director

28th October 2018