

Greencore

HUMAN RIGHTS POLICY

Introduction & Purpose

This policy sets out Greencore Group's commitment to respect the human rights of the people who work for us, in our supply chains and in the wider communities in which we operate.

Respecting human rights is a fundamental part of Greencore Group's responsibility as a company and is central to our corporate purpose; "Making Every Day Taste Better". Human Rights is a focus area within our wider Sustainability Strategy and this policy is intended to complement the Greencore Code of Ethics and Business Conduct, which sets out the fundamental principles we rely on at Greencore to carry out our day-to-day work.

We want to be confident that the people who make our products or produce the ingredients sourced for our products are not being exploited or exposed to infringements of their human rights. We are aware that human rights challenges may be present in the communities and commercial sectors in which we operate and the international supply chains from which we source.

We are committed to supporting our colleagues and supply chain workers by complying with our legal human rights requirements as defined at national, European and international levels. We will go beyond the existing legal framework to champion this issue to the best of our ability and help build a better future.

We will drive best practice in protecting human rights in our global supply chains with the aim that every worker is treated fairly. We will work to prevent exploitation within our supply chains and we want to work with like-minded businesses. Our Supplier Code of Conduct sets out the standards that we expect to be in place throughout our supply chain.

Our policy helps us support these United Nations Sustainable Development Goals:



Our Commitments

Greencore are supportive of the United Nations Guiding Principles on Business and Human Rights and will comply with UK Legislation and report our activities accordingly. We comply with the Modern Slavery Act (2015) and are determined to address the crime of modern slavery, both directly and within supply chains.

Colleagues

We aim to create a working environment where everyone feels safe, valued, respected, is treated fairly and where colleagues are encouraged to be the best they can be.

We have a range of people policies which protect our colleagues' human rights, including, but not limited to: equality, diversity and inclusion, fair treatment, holidays, working time, pensions and health and safety.

As a Group, we commit to:

- Ensuring that all products manufactured and sourced by Greencore are produced under working conditions that are hygienic and safe;
- Ensuring that all workers involved in the production of products sold by Greencore from direct and indirect suppliers and our own service providers are treated with dignity and respect;
- Acting in an ethical manner within our legal requirements, and to ensure that all legal requirements are met.
- Implementing the principles of the Ethical Trading Initiative Base Code.

We support the Ethical Trading initiative (ETI) Base Code, which is founded on the conventions of the International Labour Organisation, and is an internationally recognised code of labour practice that applies to our own business and the supply chains we choose to use.

ETI Base Code

1. Employment is freely chosen
2. Freedom of association
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

The requirements of this Policy constitute minimum and not maximum standards and should not be used to prevent companies from exceeding these standards.

Supply Chains

We are committed to driving best practice in protecting human rights in our global supply chains with the aim that every worker is treated fairly. We will work to prevent-all forms of exploitation within our supply chain and we want to work with like-minded businesses. We are fully committed to supporting supply chain workers by complying with our legal Human Rights requirements as defined at national, European and international levels. We will go beyond the existing legal framework to champion this issue to the best of our ability and help build a better future.

Our Responsible Sourcing Code of Conduct sets out the standards that we expect to be in place throughout our supply chain and is based upon the ETI base code. We know that human rights and human dignity matter to our colleagues, our shareholders, investors, customers and to the communities in which we operate. We believe in the power of working in partnership with other stakeholders and will engage with our customers and suppliers to ensure that the best standards of transparency and inclusion are adhered to within our activities.

Who does the Policy apply to?

This policy applies to all Greencore colleagues and those companies who operate in our supply chains.

How does it work?

Maintaining high ethical standards within Greencore

We maintain high internal ethical standards within our business by identifying and assessing the human rights risks that we face as a business and then managing and mitigating these risks. Within our own operations we recognise that there may be a risk of modern slavery or exploitation and therefore manage the risk through these key actions:

- Complying with the ETI base code & the Modern Slavery Act 2015 and conducting independent third-party audits of our manufacturing sites every two years to verify compliance (using the Sedex Members Ethical Trade Audit model).
- Promoting Stronger Together at our manufacturing sites and with our labour providers – this is a practical programme of training and resources intended to ensure that all workers are recruited responsibly and have fair work free from exploitation.
- Carrying out regular and meaningful staff surveys and colleague engagement activities to ensure that we hear the voices of all our colleagues.
- Conducting labour agency audits to verify practice.
- Maintaining an independent 3rd party whistle-blower line.
- Implementing other appropriate actions as deemed practical and reasonable to ensure that all workers are treated fairly.
- Providing appropriate access to remedy, compensation and justice for victims of Modern Slavery.
- Supporting victims of modern slavery back into employment at our sites.

Maintaining high ethical standards within our supply chains

We maintain high internal ethical standards within our external supply chains by adopting the same broad process as we use for our own operations - by identifying and assessing the human rights risks that may be present and then managing and mitigating these risks as follows:

- Conducting a detailed risk assessment of our supply chains
- Using SEDEX (Supplier Ethical Data Exchange) as a tool for visibility of supply chain practice
- Prohibit the use of worker-paid recruitment fees
- Reporting KPI data to our Responsible Sourcing Sustainable Business Management Group and reviewing our purchasing practices to ensure that our behaviour supports suppliers in complying with our standards.
- Working collaboratively with suppliers, industry peers, industry bodies and retail customers

Risk Assessment of our Supply Chain

Within our global supply chains we recognise that there may be a range of complex human rights risks. We will use a wide range of data and tools to support the human rights risk assessment of our suppliers. We use publicly available data, data from Sedex and information disclosed to us by suppliers to conduct the risk assessment. The assessment is completed using the industry standard risk assessment tool provided by the Food Network for Ethical Trade (FNET).

Risk is calculated using a number of factors including Country of origin and manufacture, Industry and product sector and labour profile. Risk Assessment is intended to highlight those supply chains which may require the greatest scrutiny and focus of our resources, without excluding engagement with additional supply chains if human rights issues are believed to be present.

Membership of SEDEX and supply chain transparency

We are a member of SEDEX (Supplier Ethical Data Exchange). We use the SEDEX platform to monitor compliance with both our Supplier Code of Conduct and this Human Rights Policy through self-assessment and ethical audit information.

Our food ingredient and packaging suppliers, along with other selected suppliers depending on risk, are required to connect to Greencore on Sedex and share their data with us honestly and transparently. We engage with higher risk suppliers to understand mitigations they have in place and to help to build their capacity. This engagement can include working collaboratively with them to improve performance and transparency, additional monitoring through Sedex data and publicly available information or requesting that they undergo a recognised third party ethical audit.

Worker-Paid Recruitment Fees

We prohibit the use of worker-paid recruitment fees. The charging of recruitment fees to migrant workers has been identified as a major cause of forced labour in global supply chains. Such payments can create debt bondage and leave workers vulnerable to human trafficking and exploitation. Where recruitment fees are identified in our global supply chains we will work with suppliers to resolve this issue within the boundaries of the relevant national and international legislation.

Supply Chain Collaboration

We recognise that we cannot tackle severe human rights abuse in our supply chain alone, which is why we work with a range of stakeholders to achieve positive impact for workers. We acknowledge the importance of collaborative human rights programmes and will actively engage with organisations such as the Food Network for Ethical Trade, our suppliers, customers, government and external experts.

Communication & Training

We will train relevant internal colleagues to understand the requirements of this Policy and their role in supporting internal teams and suppliers to improve performance.

How will the policy be monitored?

Governance

Compliance will be reported internally through our sustainability governance structure, namely our Ethics Sustainable Business Management Group (SBMG) and Responsible Sourcing SBMG, using detailed KPI's.

Monitoring and Reporting on Compliance

We will ensure we have the resources available to monitor our own sites and supplier compliance with this policy.

Greencore Group will make an annual disclosure, which will include the steps taken to combat modern slavery and exploitation, alongside transparency of our supply chains in accordance with the requirements of the Modern Slavery Act 2015.

Issue	Issue Date	Author	Approved	Revision Notes
1	November 2022	Head of Human Rights	Ethics SBMG	New policy