



# Human Rights Policy

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# Introduction

## Purpose

The purpose of our Human Rights Policy (henceforth the "Policy") is to affirm our commitment to respecting and promoting human rights across both our direct operations and global supply chain. It establishes clear expectations for Greencore and our suppliers to uphold human rights standards and take proactive steps to prevent abuses, such as forced labour, child labour, unsafe working conditions, and other violations. This includes ensuring that all business practices comply with relevant laws, regulations, and international frameworks. The Policy also outlines our approach to human rights due diligence, focusing on identifying, assessing, and managing any adverse human rights impacts related to Greencore's activities, while fostering a culture of continuous improvement and accountability.

## Scope

This Policy and its requirements apply to:

- Everyone working at Greencore manufacturing, logistics and office sites.
- Tier 1 Ingredient and Packaging Suppliers ("supplier").
- Labour Providers which supply colleagues for Greencore sites ("supplier").
- Third-Party Service Providers hired to provide onsite people services to Greencore ("supplier").

We expect these suppliers to uphold the human rights standards detailed in this document and ensure the same level of compliance throughout their supply chain, including Tier 2 and any subsequent suppliers. Our [Supplier Code of Conduct](#) provides a set of guidelines that define the ethical and environmental expectations we require our suppliers to adhere to in order to conduct business with Greencore.

This document should be read in conjunction with the following Greencore documents:

- [Responsible Sourcing Policy](#)
- [Supplier Code of Conduct](#)

## Policy Statement

Our human rights commitment is to conduct our business activities consistently in line with the UN Universal Declaration of Human Rights, the International Labour Organisation ('ILO') Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights ('UNGPs'), and relevant laws and regulations. We respect the fundamental rights outlined by the ILO, including freedom of association, the right to collective bargaining, and the prohibition of forced labour, child labour, and discrimination.

Our ongoing commitment to engaging with a wide range of stakeholders – including suppliers, industry partners, customers, investors, civil society, non-governmental organisations (NGOs), and community groups – at both local and global levels, is a key driver in the effectiveness of our Human Rights Strategy. This commitment is vital for building and maintaining trust, informing our policies, enhancing decision-making, and driving continuous improvement in sustainable and ethical business practices through transparent communication, collaboration, and inclusivity of diverse viewpoints.

Recognising the critical role our suppliers play in the success of delivering on this commitment, we are committed to partnering with those who comply with applicable laws and align with Greencore's core human rights principles.



## Policy Requirements

We strive to ensure that everyone involved in making our products, from the sourcing of raw materials to the production line, is treated with dignity and respect in safe, hygienic, and fair workplaces.

### Our Direct Operations<sup>1</sup>

At Greencore, we expect everyone working at our sites to play their part in making a positive impact on human rights within our direct operations. We foster a workplace culture of dignity, respect, and fairness, ensuring a workplace free from discrimination and harassment. This is upheld through comprehensive policies, ongoing training, transparent practices, and effective support systems, all designed to promote inclusivity and support for all. We promote open dialogue, encourage active participation, and welcome feedback from our workforce to identify opportunities for improvement, address concerns promptly, and continually improve our work environment.

### Our Global Supply Chain

We expect our suppliers to uphold high standards of ethical conduct, including respecting human rights throughout their supply chain, in alignment with Greencore's requirements. Suppliers must adhere to all relevant laws and regulations. Where standards differ, the higher standard which offers greater protection for workers should always be met. This must be done while respecting the customs and cultures of the territories or regions in which they operate.

Our suppliers are required to adhere to the ethical standards outlined in Greencore's *Supplier Code of Conduct* derived from the Ethical Trading Initiative ('ETI') Base Code and the Fundamental ILO Conventions. We expect our suppliers to strive for continuous improvement in advancing their human rights efforts, ensuring these standards are maintained across all tiers of their supply chain.

The complexity of Greencore's supply chains makes it more challenging to identify and influence human rights practices which may impact vulnerable workers. As a result, Greencore will prioritise engaging with suppliers operating in high-risk settings.<sup>2</sup> Suppliers and all sites within their supply chain must actively engage in due diligence activities as part of Greencore's assessment process. Recognising the potential for emerging and changing risks, we will regularly review and adjust our priorities accordingly.

We expect suppliers to be transparent with Greencore about their efforts to meet these standards and promptly inform us of any challenges that arise in maintaining them. This enables Greencore to collaborate with suppliers to address and resolve issues effectively, and make meaningful and lasting improvements to employment practices and workplace conditions.

### Our Core Principles

Our core human rights principles are central to our Policy, reflecting our commitment to maintaining a respectful and equitable workplace. We seek to ensure that these principles set forth the standards

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<sup>1</sup> "Direct operations" refers to all Greencore colleagues, as well as individuals supplied to Greencore sites by labour providers and third-party service providers.

<sup>2</sup> In this context, "high-risk settings" refer to supply chain environments where there is an elevated likelihood of adverse human rights impacts due to factors such as the nature of the commodity being sourced, the geographical location of operations, or systemic vulnerabilities within the labour market, such as reliance on migrant or informal workers. These settings are identified using industry-standard risk assessment methodologies.



upheld in our direct operations. We expect our suppliers to align with these principles and ensure the same level of adherence throughout their supply chain.

### **Cultivating a positive workplace culture**

We strive to embed a culture where dignity and respect are integral to daily interactions and decision-making. These efforts are reinforced through clear communication of our values and expectations, seeking to promote a work environment where every individual feels valued and heard.

### **Non-Discrimination**

We are committed to providing a work environment free from discrimination and harassment, where every individual is valued and treated with fairness, regardless of race, caste, national origin, religion, age, disability, sex, gender, marital status, sexual orientation, pregnancy, union membership or political affiliation.

### **Freedom of Association and Collective Bargaining**

We respect the right of individuals to form and join trade unions or other worker organisations of their choosing, and to bargain collectively without fear of retaliation.

### **Safe and Healthy Working Conditions**

We strive to ensure that all Greencore colleagues work in safe and healthy conditions. We are committed to continuously improving health and safety practices to prevent workplace injuries and illnesses. Additionally, we support the wellbeing and mental health of our colleagues through various initiatives designed to promote a positive and balanced work environment.

### **Prohibition of Forced Labour**

We strictly prohibit the use of forced or compulsory labour. We are committed to ensuring that all work is voluntary and that recruitment and related costs, as defined by the ILO, are borne by the employer and not the worker.

### **Prohibition of Child Labour**

We operate in full alignment with ILO Conventions No. 138 and No. 182, which establish that no one shall be employed under the minimum age specified by these regulations and that children are protected from the worst forms of child labour. [Include link to Child Remediation Procedure]

### **Vulnerable Groups**

We acknowledge the particular risks in place amongst those most vulnerable groups, including women, children, migrant workers, those with disabilities, and those from minority backgrounds. Recognising vulnerable groups enables us to implement more targeted interventions in effectively preventing and mitigating adverse impacts.



## Respect for Privacy

We respect the privacy rights of Greencore colleagues and stakeholders, ensuring that personal data is collected, processed, and stored in compliance with relevant privacy and data protection laws.

## Grievance Mechanisms

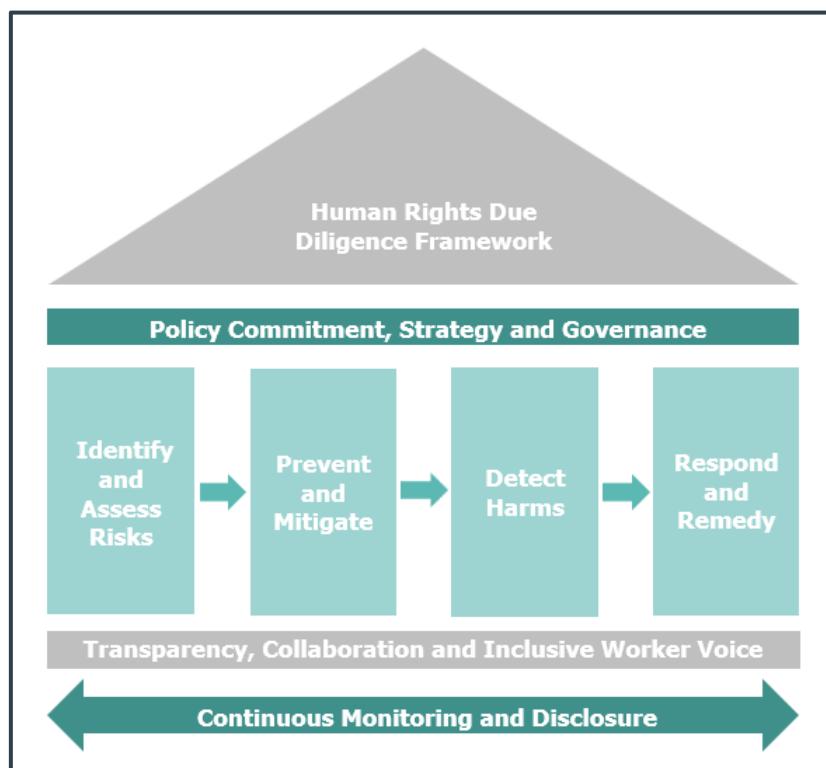
We recognise the importance of having effective grievance channels available to all Greencore colleagues without distinction. Our *Grievance Policy* aligns with the UNGPs Clause 31 requirements, ensuring that the channels provided for reporting grievances are legitimate, accessible, predictable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue.

Workers in Greencore's global supply chains must have access to effective grievance mechanisms, whether through internal systems or external independent platforms. These channels must be inclusive, trusted by workers, and demonstrate their effectiveness, ensuring that workers feel safe and empowered to raise concerns without fear of retaliation.

## Human Rights Due Diligence

Human rights risk management is integrated into our business processes and decision-making. This section outlines how we implement our commitment to human rights in practice. At Greencore, we understand that respecting human rights across our direct operations and global supply chain is essential for effectively addressing current and emerging risks, complying with current and future legislation, and meeting customer expectations. We recognise that this demands a robust and adaptable business response.

To deliver effective risk management and response, we utilise a comprehensive Human Rights Due Diligence (HRDD) Framework (**Diagram 1**) aligned with the core components of the UNGPs.



*Diagram 1: Our Human Rights Due Diligence Framework*



This Framework is designed to formalise and continuously improve Greencore's due diligence processes. It encompasses key mechanisms for the proactive identification and assessment of human rights risks and harms within our direct operations and global supply chain, as well as for preventing, mitigating, and remedying adverse impacts. The Framework also incorporates ongoing monitoring and evaluation to assess the effectiveness of our measures, allowing for adjustments to improve our human rights performance. Furthermore, it prioritises transparent disclosure and reporting, both internally and externally, on how we address human rights impacts.

Our Framework is underpinned by four important enablers, which are essential for ensuring that it effectively, and successfully upholds our commitment to human rights:

- **Strong Governance:** We integrate human rights into decision-making process, with clear accountability. Senior executives play a vital role by endorsing our human rights strategy and actively support the embedding of these principles throughout the business.
- **Transparency:** We promote open communication to build trust and provide clarity about our processes and practices.
- **Partnerships and Collaboration:** We share knowledge, resources, and best practices with external organisations, industry groups, civil society, NGOs, and local community to strengthen our collective impact.
- **Inclusive Worker Voice:** We strive to ensure that individuals feel safe and empowered to report issues. Worker testimony provides valuable insights into potential human rights concerns and instances where harm has occurred, helping us identify the need for remedies and corrective actions.

## Implementation

We have established three-year action plans (2024-2027) that address human rights within our direct operations and global supply chain. These plans provide a comprehensive framework, governance structure, and strategic direction for implementing our human rights programme. This programme encompasses various activities aimed at raising awareness, managing risks, and promoting continuous improvement in our human rights performance at Greencore.

Within our direct operations, we integrate human rights considerations into our everyday practices, ensuring they play a central role in decision-making and risk management. Similarly, in our global supply chains, we incorporate human rights considerations into our risk management processes, particularly during supplier engagement. This includes communicating Greencore's human rights commitment and expectations, as well as collaborating with suppliers to address and resolve any challenges they might encounter in upholding the high standards of ethical conduct we require throughout their supply chains. Our [Supplier Code of Conduct](#) outlines the specific actions required by each supplier group to assist Greencore in our due diligence efforts.

### Our Direct Operations

We require a range of key due diligence actions to be undertaken by different groups, including the Greencore Group, individual Greencore sites, labour providers, and third-party service providers. These actions, outlined in **Table 1** below, are critical to effectively monitor, prevent, and mitigate adverse human rights impacts. Monitoring requirements for our labour providers and third-party service providers are also outlined in Greencore's [Supplier Code of Conduct](#).



Area	Group	Action
Legal compliance	Greencore Group	<ul style="list-style-type: none"> <li>Adhere to the Modern Slavery Act (2015) with publication of an annual Statement.</li> </ul>
Sedex registration and SAQ completion	Greencore sites	<ul style="list-style-type: none"> <li>Maintain an active Supplier Ethical Data Exchange ('Sedex') membership.</li> <li>Ensure the Sedex Self-Assessment Questionnaire ('SAQ') is 100% completed and updated at least every six months or whenever significant business changes occur.</li> </ul>
Audit requirements	Greencore sites	<ul style="list-style-type: none"> <li>Complete a SMETA audit every two years and before its due date.</li> <li>Close out any non-conformances on Sedex within the given timeframes.</li> </ul>
Working Hours Tracking	Greencore sites	<ul style="list-style-type: none"> <li>Submit monthly reports to Greencore's Human Rights team to monitor colleagues' working hours and track compliance with ETI Base Code requirements.</li> </ul>
Stronger Together Business Partner Status	Greencore sites	<ul style="list-style-type: none"> <li>Achieve and maintain Stronger Together Business Partner Status, including through completion of 'Tackling Modern Slavery in Business' training.</li> </ul>
Grievance channels	Greencore sites	<ul style="list-style-type: none"> <li>Provide an independent third-party hotline, "Speak Up", accessible by everyone working at Greencore, including agency and contracted colleagues.</li> </ul>
Sedex registration and SAQ completion	Labour providers	<ul style="list-style-type: none"> <li>Maintain an active Sedex membership.</li> <li>Link the Sedex account to Greencore on the Sedex platform.</li> <li>Ensure the Sedex SAQ is 100% completed and updated at least every six months or whenever significant business changes occur. Share updated SAQs with Greencore.</li> </ul>
Working Hours Tracking	Labour providers	<ul style="list-style-type: none"> <li>Submit monthly reports to Greencore's Human Rights team to monitor colleagues' working hours and track compliance with ETI Base Code requirements.</li> </ul>
Internal ethical audits	Labour providers	<ul style="list-style-type: none"> <li>Undergo six-monthly internal audits in line with the ETI Base Code standards conducted by Greencore and address any non-conformances promptly.</li> </ul>
Internal ethical audits	Third-party service providers	<ul style="list-style-type: none"> <li>Undergo annual internal audits in line with the ETI Base Code standards conducted by Greencore and address any non-conformances promptly.</li> </ul>

**Table 1:** Due diligence activities implemented within Greencore's direct operations

## Our Global Supply Chain

Our tier 1 ingredient and packaging suppliers must link with us on Sedex and share their Sedex SAQ with Greencore. This information should be 100% complete and updated at least every six months, or whenever business changes occur.



Tier 1 suppliers are also required to provide access to information from their lower-tier suppliers. This access is essential for Greencore to identify and evaluate key risks and the mitigation measures in place. In some cases, this may require our suppliers to introduce Greencore to their suppliers for direct communication. This requirement is particularly important for suppliers whose supply chains involve locations or ingredients known to have high-risk factors. Specific suppliers will be notified if this requirement is applicable to their situation.

### Risk Assessment

We conduct an annual human rights risk assessment of our ingredient supply chain using the risk assessment tool developed and maintained by the Food Network for Ethical Trade ('FNET'), combined with data from Sedex and insights from collaboration and horizon scanning. This assessment helps us identify high-risk areas within our global supply chain based on ingredients and geographic locations. By determining which suppliers operate in these high-risk areas, we can direct our enhanced due diligence efforts towards them, which will inform our supplier engagement plan.

### Enhanced Supplier Engagement

Our supplier engagement activities, guided by our supplier engagement plan, include but are not limited to:

- Reviewing available data, including existing third-party ethical audits.
- Requiring suppliers to participate in additional third-party ethical audits.
- Direct engagement with suppliers by Greencore's Human Rights Team, which may involve remote meetings, on-site visits, interviews with management and workers, and document reviews.
- Collective engagement between suppliers, Greencore, and NGOs/civil society.

## **Prevention and Mitigation**

When human rights issues are identified within our direct operations or global supply chain, we adopt a structured and collaborative approach to address them. Our primary focus is to support suppliers in overcoming human rights challenges while safeguarding the wellbeing and livelihoods of affected individuals. We work closely with our suppliers to support the implementation of effective prevention and mitigation measures. This includes offering guidance and resources to assist in resolving issues and improving their practices.

## **Continuous monitoring**

We monitor the effectiveness of these measures through ongoing evaluation to confirm that issues are being resolved and improvements are maintained over time. By conducting regular follow-ups and reviews, we evaluate progress and make necessary adjustments to our intervention measures.

## **Remediation**

In cases requiring remediation where Greencore has not "caused" or "contributed" to the adverse impact, we take a proactive role in facilitating the process by supporting suppliers in ensuring that affected individuals receive appropriate remedies.

## **Stakeholder collaboration**

Addressing the various challenges within our global supply chain requires collective action, as we cannot tackle these issues alone. By engaging with a broad range of stakeholders, both locally and globally, Greencore colleagues gain valuable insights and diverse perspectives on labour-related



issues, as well as broader human rights concerns. We recognise that human rights risks are systemic and require collaborative action based on an understanding of their root causes. To tackle issues such as recruitment fees, wages, and working conditions, we work collaboratively and pre-competitively with peers to raise standards and leverage our collective influence for change.

Much of our effort to address labour rights issues in high-risk supply chains is approached through multi-stakeholder initiatives. We are active members of organisations such as the Association of Labour Providers ('ALP'), Modern Slavery Intelligence Network ('MSIN'), Food Network for Ethical Trade ('FNET'), and the Issara Institute. Industry collaboration helps align and streamline the information and standards businesses require from their supply chains, reduce duplication, and share insights and intelligence on common risks, thereby maximising our collective efforts and resources.

## Roles and Responsibilities

Role	Responsibility
Chief Operations Officer (COO)	Overall executive sponsor of our Better Future Plan.
Chief Commercial Officer (CCO)	Executive sponsor and accountable for the 'Sourcing with Integrity' pillar, encompassing our plans for responsible sourcing and ensuring human rights are upheld throughout the global supply chain.
Chief People Officer (CPO)	Executive sponsor and accountable for the 'People at the Core' pillar, focusing on our plan to uphold human rights within our direct operations.
Sustainable Business Management Group (SBMG) for Responsible Sourcing and Human Rights	Cross-functional forums attended by the accountable executive to oversee Plan roadmaps, manage risks, monitor issues, and update our leaders on external developments.
Head of Sustainability	Overall responsibility for the Better Future Plan.
Head of Human Rights	Responsible for human rights leadership in the business.

## Policy Governance

**Accountability and implementation** - Our Human Rights Programme is underpinned by a strong governance model. More information on our approach to governance and accountability can be found in our latest Sustainability Report, available on our website.

**Policy ownership** - The owner of this Policy is the Head of Human Rights within our Sustainability Team, who is responsible for its effective implementation, maintenance, and oversight. This role is supported by the designated Sustainable Business Management Group (SBMG) covering human rights in our own operations and our global supply chain, providing valuable input and guidance. Together, we work to ensure the Policy remains relevant and effective.

**Internal communication and training** - This Policy will be communicated to all relevant functions within Greencore via email and in-person meetings. Training sessions will be conducted for relevant teams upon Policy implementation and after each subsequent review thereafter.

**Policy monitoring** - Implementation of this Policy will be continuously monitored through data collection and stakeholder feedback by the Human Rights Team. Key metrics, such as incident



reporting and training, will be tracked. Results will be communicated to senior leadership and relevant stakeholders, and any issues will be addressed promptly.

**Policy review** - The Policy will be reviewed on an annual basis by the Sustainability Team and updated to reflect changes in regulations, industry standards, and organisational goals. As Greencore continues to mature its approach to human rights in the coming years, our policy position will naturally evolve to ensure alignment with best practices and emerging trends. Greencore will formally notify suppliers of any changes or updates to our Policy requirements, ensuring they have sufficient time to prepare for implementation and ensure compliance.

### Version Control

Version	Date	Comments
<b>1.0</b>	November 2022	Policy created
<b>2.0</b>	December 2024	Policy reviewed and updated on new template

## Supporting Information

Information Resource	Title	Owning Function	Link
<b>Document</b>	Responsible Sourcing Policy	Sustainability Team	<a href="#">Link</a>
<b>Document</b>	Supplier Code of Conduct	Sustainability Team	<a href="#">Link</a>