

## Human Rights Policy – Finnebrogue Group

### Introduction

Finnebrogue are committed to protecting the human rights of our employees, and those who work within our supply chain. The purpose of this policy is to provide guidelines on Human Rights within the workplace and set out our minimum expectations. As part of the United Kingdom, the fundamental rights of people in Northern Ireland are protected under the Human Rights Act 1998. Finnebrogue aim to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights. We want to increase the enjoyment of human rights within the communities in which we operate. This policy is set out in conjunction with our Modern Slavery and Human Trafficking Statement, which outlines our zero-tolerance approach to modern slavery and gives our full commitment to preventing slavery and human-trafficking within all areas of our business.

### Definitions

- **Human Rights:** the basic rights and freedoms that belong to every person in the world, from birth until death
- **Human Rights Act 1998:** sets out the fundamental rights and freedoms that everyone in the UK is entitled to
- **UK Guiding Principles on Business and Human Rights:** a set of guidelines for companies to prevent and address human rights abuses committed in business operations

### Responsibilities

- **Human Resources:** HR is responsible for administering and monitoring this policy. They are also responsible for ensuring all employees are able to raise concerns around breaches of their human rights.
- **Directors:** Directors are responsible for supporting and ensuring their employees comply with this policy.
- **Line Managers:** Managers are responsible for ensuring all employees are aware of this policy and know how to report concerns.
- **Employees:** All employees are subject to this policy. All employees are responsible for ensuring they comply with the requirements of the policy and specifically to participate in a professional, consistent and equitable manner at all times.

## 1. How it works

Respect for human rights is fundamental to the sustainability of Finnebrogue and the communities in which we operate. In our Company and across our system, we are committed to ensuring that people are treated with dignity and respect. Finnebrogue Human Rights Policy is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

Finnebrogue respects human rights. It is committed to identifying, preventing, and mitigating adverse human rights impacts resulting from or caused by our business activities

before they occur. The business is also committed to addressing any Human Rights concerns that arise in a timely manner, through the company grievance or whistleblowing procedures.

### **1.1 External Stakeholders**

Finnebrogue understands that their impact on Human Rights goes much wider than just internal employees and workers. Finnebrogue is committed to working with and encouraging our suppliers to uphold the principles in this Policy and to adopt similar policies within their businesses. Our suppliers are expected to sign our Supplier Code of Conduct, and be SEDEX registered. Finnebrogue recognises its impact on the communities in which it operates. We are committed to engaging with stakeholders in those communities to ensure that we are listening to, learning from and taking into account their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. We believe that local issues are most appropriately addressed at the local level. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

### **1.2 Diversity and Inclusion**

Finnebrogue values the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equal opportunities and intolerance of discrimination and harassment. We are dedicated to maintaining workplaces that are free from discrimination or harassment on the basis of race, sex, colour, national or social origin, religion, age, disability, sexual orientation, political opinion or any other status protected by applicable law. Finnebrogue also work with local organisations such as Diversity Mark to set diversity and inclusion related targets, to ensure D&I is at the heart of all business decisions.

The basis for recruitment, hiring, placement, training, compensation and advancement at Finnebrogue is qualifications, performance, skills and experience. Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace.

These principles apply not only to Company employees but also to the business partners with whom we work.

### **1.3 Freedom of Association & Collective Bargaining**

Finnebrogue respects our employees' right to join, form or not to join a trade union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

Although there is no recognised Union currently operating on our sites, Finnebrogue does put alternatives in place for employees to directly raise concerns or suggestions with the Directors of the business. Employees are invited to participate in 'The Voice' programme at each site, and can bring any concerns to the attention of management at such meetings.

## **2. Safe Working Environment**

Finnebrogue provides a safe working environment and complies with applicable safety and health laws, regulations and internal requirements. We are dedicated to maintaining a productive workplace by minimising the risk of accidents, injury and exposure to health risks.

We are committed to engaging with our employees to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.

### **2.1 Workplace Security**

The Company is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.

Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity.

### **2.2 Forced Labour & Human Trafficking**

Finnebrogue has a zero-tolerance approach to modern slavery and forced labour, and are fully committed to preventing slavery and human trafficking within all of our business activities. Finnebrogue acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Finnebrogue also understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains. Finnebrogue works closely with suppliers and customers to adhere to these commitments in tackling Modern Day Slavery.

Finnebrogue does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Finnebrogue in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Finnebrogue strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in Northern Ireland and in many cases exceeds those minimum standards in relation to its employees.

### **2.3 Child Labour**

Finnebrogue will not tolerate the exploitation of children, their engagement in unacceptably hazardous work, and the physical punishment, abuse, or involuntary servitude of any worker. Finnebrogue ensures that no person below the age of 15 years is employed in the workplace, prohibits the use of forced or compulsory labour in all operations and does not engage with vendors and suppliers who resort to using child labour and forced labour in their operations.

We expect our suppliers and contractors with whom we do business to uphold the same standards and should a pattern of violation of these principles become known to Finnebrogue and not be corrected, we shall discontinue the business relationship.

## **2.4 Work Hours, Wages and Benefits**

All hours worked will be paid directly to an employee, to a bank account registered in their name only. Any concerns with wages or working hours should be addressed with the payroll team immediately. All company benefits are outlined in the company's 'Pay and Benefits Policy.'

## **3. How to raise a concern**

In the first instance where you have a concern that your human rights are being breached or not adhered to fully, you should report these concerns to your line manager or a representative from the HR team, where the concern relates to your line manager or it is not appropriate to make the report to your line manager. All concerns reported will be treated in the utmost confidence. You may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

Following receipt of a disclosure made under this policy, an investigation meeting will be held with the employee. The purpose of this meeting is to gather as much information as possible from the employee regarding their concerns, including whether they have any supporting evidence or can identify any witnesses. This meeting will be held within 5 working days following receipt of the disclosure.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements.

Once the investigation is complete, the investigating manager will write to the employee confirming the outcome.

## **4. Alternative ways to raise concerns**

Alternatively, there are a number of channels which are available for employees which are anonymous:

- NAVEX: Dial 0-800-89-0011, then dial (833)547-0149
- Asda Ethics: 0800 963 8442 / [ethics@asda.co.uk](mailto:ethics@asda.co.uk)
- SafeCall - 0800 915 1571 / [www.safecall.co.uk/coop](http://www.safecall.co.uk/coop)

The operation of this policy will be monitored and a review conducted annually or upon an update. HR will be responsible for initiating the review.



Signed

A handwritten signature in black ink, appearing to read 'Andrew Nethercott', is positioned below the word 'Signed'.

**Andrew Nethercott**  
Chief Executive Officer