

# Human Rights Policy

## About this policy

This policy confirms our commitment to Human Rights and what we are doing to respect and protect the Human Rights of the people we employ, the people who work in our supply chains and the people who live in the wider communities in which we operate both nationally and internationally.

## Who does this policy apply to?

This policy applies to all subsidiaries and therefore employees that are part of the Premier Foods Group. Whilst not directly under the scope of this policy, we expect all our third-party partners (Customers, Distributors and/or Suppliers,) to maintain a similar position and approach to Human Rights as outlined within this policy.

## Responsibility for this policy

The HR and Procurement function have joint responsibility for this policy, and colleagues who have any queries relating to it, should contact their local HR or Procurement representative.

# Human Rights Policy

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## 1 Introduction

Respect for Human Rights is a core value of Premier Foods. We believe that people are entitled to enjoy Human Rights, without discrimination, and should be treated with dignity. Human Rights are inherent in all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. As a business, we are committed to protect and respect Human Rights of all individuals and remedy any areas for improvement should they occur, in line with the United Nations Guiding Principles (UNGP) on Business and Human Rights to international standards.

This policy confirms our commitment to Human Rights, and what we are doing to respect and protect the Human Rights of the people we employ, the people who work in our supply chains and the people who live in the wider communities in which we operate both nationally and internationally.

We expect our strategic partners and/or suppliers to uphold these principles and adopt similar policies within their own businesses.

## 2 Scope

This policy applies to all subsidiaries and therefore employees that are part of the Premier Foods Group. Whilst not directly under the scope of this policy, we expect all our third-party partners (Customers, Distributors and/or Suppliers,) to maintain a similar position and approach to Human Rights as outlined within this policy.

## 3 Our Purpose

Our Human Rights Policy supports the company purpose of **enriching life through food**, which means enriching life for our:

- **consumers** by ensuring that the food we create enables people to lead sustainable, healthier lifestyles;
- **colleagues** by creating an inclusive culture, where people can reach their full potential, as well as attracting the very best talent and embracing diversity along the way;
- **communities** by creating economic activity and helping to address specific challenges such as food insecurity, employability skills and local environmental quality;
- **planet** by making food in a way that respects the world's resources by either reducing our environmental footprint through climate action, reducing food waste, or maintaining high ethical standards across our supply chain.
- We will work with our third-party partners/suppliers to address any breaches of Human Rights.

By continuing to enrich the lives of our consumers, our colleagues and our communities, as well as the planet we live on, we can grow our business effectively and sustainably.

Our **core values** and **Leadership Behaviours** underpin our culture and are imperative to the role colleagues play in ensuring that breaches of Human Rights do not take place at Premier Foods or with our third-party partners. It is our duty to create a safe place for colleagues to question and check if Premier Foods is complying with the principles of this policy, as well as questioning and checking with our third-party partners as to whether they have a current Human Rights Policy and any relevant action plans to ensure that they are making improvements as necessary. We encourage our colleagues and third-party partners to speak up if they see something that causes concern.

## 4 Key Points

### 4.1 Governance

Premier Foods' responsibility to respect Human Rights means we are committed to implementing the UN Guiding Principles on Business and Human Rights throughout our business and reporting on our progress in line with the Food Network for Ethical Trade (FNET) Due Diligence Framework.

The Human Rights Policy is overseen by our CEO and supported by the Premier Foods Executive Leadership Team. In addition, the Policy is approved by the Board of Directors. Our Progress and updates are regularly reviewed with senior leaders in the ESG Governance Committee which is chaired by our CEO and includes members of our Executive Leadership Team (ELT) and specialists from across the business.

The ESG Governance Committee is consulted on human rights issues when the severity of an action or potential risk is high, where a business-critical decision needs to be taken, or where substantial financial investment may be needed to address an impact.

We will use the Human Rights Due Diligence framework to identify, quantify and prevent Human Rights risks to workers (anyone who works for or on behalf of Premier Foods) impacted by our activities. To ensure this remains a regular focus for Premier Foods, we have established a Human Rights Working Group to lead our work on adopting best practice in managing human rights risks. Should we identify any potential Human Rights breaches due to our business activities, we are committed to ensure we provide for, or co-operate in, their fair and equitable resolution. This also applies to any adverse impacts through our relationships with third parties. Should there be any areas identified that we need to improve, we will put in place an action plan to ensure we resolve any issues working closely with any external suppliers/third parties to rectify.

Our Human Rights approach requires compliance with all applicable local laws and regulations. As a business, we align to the **Ethical Trading Initiative (ETI) Base Code**, which is an internationally recognised code of labour practice that applies to our business and the supply chains we choose to use. Our respect for Human Rights is not limited to this code, as we are committed to tackling all forms of Human Rights breaches. We have policies in place to meet the ETI base code requirements and to identify and eradicate any potential practices within our own business and to reduce and eliminate risks across our complex supply chain.

### 4.2 Policies

#### Inclusion and Diversity

As a business, we believe in inclusion, authenticity, and individuality. Our culture is one where everyone is welcome. We are committed to equal opportunities for all and do not tolerate any form of discrimination and harassment. We maintain a safe working environment for all that are free from discrimination and harassment on the basis of race, sex, colour, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. This is detailed in our **Inclusion and Diversity Policy**.

### **Security at Work**

We are committed to promoting a harmonious working environment, free from harassment and bullying, where all colleagues should be treated, and treat others, with dignity and respect and can carry out their role without fear of being harassed, bullied, discriminated against or victimised as detailed in our **Harassment, Bullying & Dignity at Work Policy**. We will not tolerate bullying or harassment of any kind towards a colleague or group of colleagues and all allegations of bullying and harassment will be investigated and, if appropriate, disciplinary action will be taken. Should a colleague wish to raise a complaint in this area, the process of this is detailed in our **Grievance Policy**.

All individuals have the right to be treated with dignity and respect and we have a responsibility to ensure that all colleagues feel that they are protected from any kind of harassment. This also applies to the treatment of clients, customers, third-party partners and members of the public who have dealings with the Company and its colleagues.

### **Health and Safety**

Our **Health and Safety Policy** is designed to provide a safe and healthy work environment, including safe access and egress arrangements and to prevent work related injury and ill health. We achieve this by setting effective and consistent standards and targets which are adopted at every site to fulfil our legal obligations and also drive continuous improvement. We aim to prevent accidents and work-related ill health through suitable training, instruction and supervision of our colleagues, contractors, visitors and others to ensure their safety and to complete suitable and sufficient risk assessment ensuring the proportionate control of risks which may arise in work activities. We also expect the same of our suppliers/third-party partners.

### **Human Trafficking and Forced Labour**

We prohibit the recruitment, movement, harbouring or receiving of children or adults using force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation.

At Premier Foods, we have a zero-tolerance approach to modern slavery and our **Modern Slavery Statement** is made in accordance with our obligations under the Modern Slavery Act 2015 and sets out what we are doing to prevent modern slavery within our own business and/or Supply Chain. Given the wide range of products and services which we produce, and our significant number of suppliers, we have established an **Ethical Trading Policy**, which is based around the internationally recognised code of labour practices, and all these policies are in place to help identify and eradicate any unlawful practises and to reduce and eliminate risks across our complex supply chain. We also ensure we adhere to the **Employers Pay Principles**.

### **Child Labour**

Children and young persons under the age of 18 shall not be employed at night or in hazardous work conditions in the UK and the local minimum working age internationally. We require the age of our colleagues to be verified at the time of hiring and have processes in place to responsibly remediate any potential policy violations to ensure we are legally compliant in UK and/or international law. Please refer to our **Child Labour Remediation Policy** in appendix 1.

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

We respect our colleagues right to join, form or even not join a Trade Union, without fear of any consequences. Where colleagues are represented by a legally recognised Trade Union, we are committed to working in partnership with the Trade Union Representatives. It is typically our manufacturing sites who have such relationships. Premier Foods is committed to working collaboratively with all recognised Trade Unions.

### **Hours, Pay and Benefits**

Premier Foods compensate colleagues with pay equitable with their role, skills and experience and external benchmarking. For our manufacturing colleagues this will be in line with the terms and conditions of any relevant collective bargaining agreements. We ensure full compliance with wage, work hours, overtime and benefit laws. In addition to this, we are committed to employing colleagues on contracts of employment where there is a stated number of contracted hours. We do not directly employ any colleague on a 'zero hours' contract. This policy statement applies to all sites owned and operated by Premier Foods.

All our colleagues pay meets or exceeds the legal minimum wage. Overtime is paid at the appropriate rate as agreed as part of any collective bargaining agreement and/or contract of employment. All colleagues are paid on time and in full and receive a pay statement for each pay period that outlines the components of their pay, including hours worked, benefits received, and any deductions.

In terms of our Supply Chain, we believe it is important that we understand the impact that our goods have on the people that produce it. We continue to champion high ethical labour standards across our supply chain, and ask our ingredients, co-manufacturing and packaging suppliers to provide full transparency and disclosure through our information sharing platforms EcoVadis and Sedex.

For our suppliers involved in high-risk category materials, we require a commitment to work with us on plans to ensure their materials are supplied responsibly and sustainably, through use of relevant certification standards and/or SMETA audits. This risk-based approach is supported by our own Food Safety & Technical Audits covering areas such as health and safety and labour rights.

### **Data Protection**

Everyone has the right to the protection of personal data concerning themselves. Such data must be processed fairly for specified purposes and on the basis of the consent of the person concerned or some other legitimate basis laid down by law. Premier Foods ensures the handling of consumer, customer, supplier and colleague data is in line with GDPR Regulations. In order to achieve this, we have a **Data Protection Policy** and annual GDPR e-learning training for relevant colleagues.

### **Healthy Living**

At Premier Foods, we care about the quality of our products and the health of our consumers as confirmed in our **Use of Nutrition and Health Communications Policy**. We set targets to improve the nutritional value of our products, whilst ensuring that we never compromise on the taste our consumers prefer. Wherever we can, we reduce levels of fat, salt and sugar and offer “better for you” options including appropriate portion sizes. We continuously strive to help consumers make informed choices and achieve a balance between enjoyment and health by ensuring responsible communication around our products. We comply with all regulations, regulatory codes of practice and the Committee of Advertising Practice’s CAP and BCAP codes concerning the use of nutrition and health claims in commercial communications.

We care about the health of our consumers and provide transparent, comprehensible information that can be accessed by all consumers. We apply the “IFBA Global Policy on Marketing and Advertising to Children” across our value chain and take part in the EU Pledge, a voluntary initiative on Responsible Advertising to children. Our commitments are further explained in our **Marketing to Children Policy**.

### **Land Rights and Water Resources**

We acknowledge that access to water and sanitation is a human right and are working towards developing policies on this matter as well as conducting water risk assessments. Land is a vital asset to individuals and communities around the world. When land is threatened due to discriminatory practices, conflict, corruption, unsustainable development, forced evictions or land confiscations, environmental degradation, or other factors, individuals and communities suffer. Therefore, Premier Foods recognises the land rights of Indigenous peoples and is committed to work with suppliers and customers that respect the concept of free, prior and informed consent.

### **Speaking Up/Whistle blowing**

Premier Foods is committed to conducting business with integrity and fairness, with respect for our **Code of Conduct, Values, Behaviours** and within the Law. We have a **Speaking Up Policy** which is available for anyone who works for, or on behalf of, the Premier Foods’ group of companies. It also applies to anyone who has a business relationship with us for example, contractors, agency workers, customers, suppliers, distributors, and shareholders. As part of this policy, we provide an externally run 24/7 service, available online or via a freephone helpline, Safecall ([www.safecall.co.uk/report](http://www.safecall.co.uk/report) or <https://www.safecall.co.uk/en/file-a-report/telephone-numbers/> where people can confidentially raise concerns regarding suspected misconduct and/or breach of Company Policy or employment law.

In order to make this more accessible to everyone working in our supply chain, we have published Safecall’s details on our website. As a business we strongly support feedback and open dialogue on human rights, and we encourage communities and/or individuals to raise any concerns with us directly.

When managing non-compliances, we first look to engage our suppliers and business partners to drive corrective actions that help address the underlying issues. Where direct engagement does not lead to meaningful progress, we consider all appropriate forms of leverage, including the reduction and/or termination of supply.

### **4.3 How do we mitigate our risks?**

#### **Employees**

For our colleagues, we publish all the relevant policies and procedures. In addition to this, for our key policies such as **Anti-Bribery and Corruption Policy**, we provide annual e-learning for all relevant colleagues.

## Supply Chain

We recognise that we need to work in partnership with our supply chains and customers to mitigate and improve Human Rights issues. We are committed to driving best practice in protecting Human Rights in our supply chains, with the aim that every worker is treated fairly, to prevent all forms of exploitation as like-minded businesses. We are committed to supporting supply chain workers by complying with our legal Human Rights obligations, as defined at national, European, and international levels.

Our **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 are important for our colleagues, our shareholders, investors, customers and to the communities in which we operate. We will engage with our customers and suppliers to ensure that the best standards of transparency and inclusion are adhered to within our activities.

As part of our on-going supplier communication process, we undertake to issue to suppliers on an annual basis a copy of the **Premier Foods Group Standard Terms and Conditions for the Purchase of Goods and Services**. Periodically, we also circulate other key policy documents, including our **Ethical Trading Policy, Anti Bribery and Corruption Policy, and Responsible Sourcing Handbook**.

We believe it is important that we understand the impact that our goods have on the people that produce it. We have high ethical labour standards across our supply chain and request that our direct ingredients, BIFG (Brought in Factor Goods) suppliers, and packaging suppliers become members of SEDEX. We also request other indirect 'high risk' category suppliers (e.g. laundry, warehousing, logistics/warehouse and labour providers etc) also join SEDEX in order to help us gain greater visibility of key risks across our extended supply chain.

Based on risk, packaging, ingredient and bought-in-finished-goods suppliers who are a medium or high-risk supplier (determined by reference to the supplier geographic sourcing region and nature of the product supplied), will have a physical Premier Foods Technical audit. These audits are conducted by either a member of the Premier Foods' compliance team, or our contracted 3rd party auditing company. We support and help to develop our suppliers, with regular technical reviews and engagement, so we are working together. With this approach we aim to foster an open and transparent long-term relationship with our suppliers.

There is an element of ethical auditing within the Technical Food Safety Audit, which is used to establish if the supplier meets our requirements of being an active member of SEDEX by completing the self-audit questionnaire, have an SMETA ethical audit on a risk-based frequency and closing down any non-conformances raised during those SMETA audits. To ensure transparency with our suppliers, we ensure we have visibility of our supplier SMETA audit via SEDEX. All SMETA audits are audited against the ETI Base code criteria using the SMETA methodology and relevant country law.

All Premier Foods' sites are registered on SEDEX, and all sites have a SMETA audit on an annual or bi-annual basis or as per customer requirements. These audits are available to our customers on SEDEX where we give full transparency of our sites audits and self-audit questionnaire. We ensure that any non-conformances raised are addressed, actioned, and closed out in a timely manner.

We are continuously reviewing our contractual documents to ensure our commitment to and our due diligence towards Human Rights is clear. In addition, we have pre-requisites as part of our e-tendering

procedure, ensuring that invited suppliers answer Human Rights questions amongst the broader ESG related questions.

#### 4.4 Communication and Training

We communicate our Human Rights policy throughout the business. In addition, certain functions receive training.

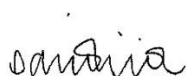
#### 4.5 Remedy

As a business, we will continue to build the awareness and knowledge of employees and workers on human rights as detailed in this policy. We actively encourage anyone to speak up, without fear of retribution, by contacting us directly or via our Safecall or Grievance Procedure, if they have any information on adverse human rights in our business and/or with any of our third-party partners. We have fair and confidential procedures in place to manage any such concerns. The outcome of any procedure will ultimately result in providing a remedy where they have caused or contributed to an impact on human rights. We are committed to continue to increase our capacity to effectively identify and respond accordingly to any concerns that may arise.

#### 4.6 Accountability

This policy was approved by the board of Premier Foods plc on 18th July 2024. The Premier Foods CEO has overall accountability for human rights within Premier Foods, with support from the Executive Leadership Team. The Human Resources Director is accountable for ensuring best practice is maintained internally and the Director of Procurement is accountable for mitigating external risk throughout our Supply Chains.

This Human Rights Policy consolidates our existing commitments with the purpose of continuously improving the clarity and transparency of Premier Foods' practices. We reserve the right to review this Human Rights Policy on a regular basis and update it if necessary. The latest version of this document will be posted on our website: [www.premierfoods.co.uk](http://www.premierfoods.co.uk).



David Wilkinson

**Human Resources Director**



Gareth Pullan

**Director of Procurement**

## Appendix 1

### Child Labour Remediation Policy

If there is any suspicion that an underage worker is employed, either at one of Premier Foods' sites, or within our supply chain, the below steps should be taken:

- a) Act quickly and appropriately in all the circumstances to best protect the safety of the underage worker
- b) Establish an action plan to resolve the situation.

It is acknowledged that each and every occasion of underage working will be different and be very fact-specific. However, when establishing an action plan, the following steps must always form part of the considerations when developing the action plan:

- a) Ensure the affected underage worker is safe, protected from victimisation or further vulnerability;
- b) Consult with the child and his/her family to understand their wishes and needs
- c) Agree a process and next steps for the child/children involved
- d) Compensation for loss of income
- e) A commitment for remediation, potentially including a stipend, housing, and food while the investigation gets underway
- f) Where appropriate, offering the job to a qualified adult member of the child's family
- g) Enabling the child to attend school, including if necessary the payment of relevant fees

Once the action plan has been established, the following two mechanisms must be implemented to review the situation:

- a) Conduct a detailed investigation with guidance and assistance where necessary from child labour and protection experts
- b) Implement a monitoring and review schedule and process to review the effectiveness and appropriateness of the action plan.