

Human Rights Policy

1. Introduction

This Human Rights Policy outlines our commitment to upholding and respecting human rights in all aspects of our business, in line with all local and international legislations. We believe businesses have a responsibility to treat people fairly, operate ethically, and contribute positively to the communities in which they operate.

Our approach is guided by the principles set out in the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work. We aim to embed human rights considerations into all business decisions and ensure that our operations, services, and partnerships respect the dignity, rights, and wellbeing of our employees, customers, and all individuals affected by our work.

2. Scope and Governance

This policy applies to all our employees as well as all our customers, and any individuals or communities affected by our business operations and supply/value chain.

All employees are responsible for upholding the principles outlined in this policy, while the senior management team are responsible for ensuring compliance and promptly investigating reports of any concerns. The Board of Directors are responsible for regularly reviewing and updating this policy to ensure continued compliance with relevant legislations.

3. Our Principles

We are committed to a workplace that upholds the five fundamental principles of the ILO:

- **Freedom of Association:** We respect the right of all workers to form and join groups of their choosing and the effective recognition of the right to collective bargaining.
- **Elimination of Forced Labour:** We maintain a zero-tolerance policy toward all forms of modern slavery, human trafficking, and compulsory labour.
- **Abolition of Child Labour:** We are committed to the effective abolition of child labour within our operations and supply chain.
- **Elimination of Discrimination:** We prohibit discrimination in respect of employment and occupation, ensuring equal opportunity for all.
- **Safe and Healthy Working Environment:** We are committed to providing a work environment that protects the physical and mental health of our people.

We are committed to conducting all our business operations in accordance with local and international legislations. We will conduct human rights due diligence across our

supply chain to identify, prevent, address, and remediate any actual or potential human rights abuses.

We maintain a **zero-tolerance policy** towards any form of human rights abuse and ensure that all our employees are familiar with the grievance procedure.

4. Our Commitments

To support these principles, we are committed to:

- **Due Diligence & Remediation:** Conducting human rights due diligence across our supply chain to identify, prevent, and remediate any actual or potential human rights abuses.
- **Awareness:** Training our staff to recognise and uphold these principles in their daily decision-making, and embedding these principles into company policies, procedures, and decision-making processes.
- **Non-discrimination and equal treatment** by prohibiting discrimination and maintaining a zero-tolerance policy. Please see our Justice, Equality, Diversity, and Inclusion (JEDI) statement for more details.
- **Accountability and continuous improvement** by regularly reviewing workplace policies and practices to identify and address potential gaps.
- **Responsible business relationships** by working with partners, suppliers, and stakeholders who share our values and commitment to responsible and ethical business conduct.

5. Reporting Concerns

Employees, partners and stakeholders are encouraged to report concerns or violations without fear of retaliation (i.e., through our Grievance Procedure). All concerns will be investigated promptly and handled confidentially where possible.

Non-compliance with this policy may result in corrective actions in accordance with our policies and procedures. Consequences may include training, performance evaluations, or other appropriate measures, including disciplinary action, depending on the nature and severity of the violation.

6. Policy Review

This policy will be reviewed annually and approved by our Board of Directors. Updates or changes to this policy will be communicated publicly and internally to ensure transparency and alignment with best practices in human rights and responsible business conduct.

Approved on behalf of the Board of Directors by: Stephen Vine, Managing Director
Signature:

A handwritten signature in black ink that reads "Stephen Vine". The signature is written in a cursive style, with the first letter of "Stephen" being a large, stylized 'S' that loops around. The word "Vine" is written in a similar cursive style, with a large 'V'.

Date: 25/08/2026