



## Human Rights Policy

As a responsible employer we fully support and work alongside the principles outlined in the United Nations Guiding Principles (UNGP) on Business & Human Rights.

Agrial Fresh Produce Ltd. support the Government's belief that the promotion of business and the respect for human rights go hand in hand: responsible action by the private sector on human rights is good for business and communities; it helps create jobs, customers and a sense of fairness; it contributes to a market's sustainability and therefore its potential to generate long-term growth.

### Status of this procedure

This procedure applies to all our sites in the UK. It is based on internationally recognised human rights principles as laid down in the UN Guiding Principles on Business and Human Rights. The company reserves the right to review this procedure from time to time.

### General principles

As a Company we are committed to respecting human rights and complying with all applicable laws in all areas of our business. When we are faced with conflicting requirements between local law and internationally recognised human rights we will seek ways to honour the principles of the UN.

This policy needs to be read in conjunction with the Agrial Code of Conduct and the other policies detailed below. To ensure we respect the human rights of our employees and stakeholders we have clearly defined policies and procedures detailing how we should behave in a socially responsible way.

For our key stakeholders we are committed to helping them identify potential human rights impacts and working with them to prevent and mitigate these impacts.

For suppliers we are committed to implementing due diligence and review processes to ensure they are operating in an ethical and responsible manner. We expect our suppliers to respect human rights, taking action to identify, prevent and mitigate human rights risks. If we are made aware that they are not managing their adverse human rights impacts we will work with them to address these shortfalls. We expect all our suppliers to inform us of any direct, indirect or potential adverse impact within the supply chain.

In the areas we operate in we consider the local community and review our processes to determine any adverse impact we may cause or contribute to with our business activities.

For our employees we are committed to respecting human rights and offering employment and development to the widest range of people. We want to develop effective working partnerships with partners to provide decent working conditions for anyone involved in the production of our products. We are committed to providing a safe and healthy working environment for our employees. We uphold the principles of respect, equality and fairness. We strongly condemn any form of harassment, violence, defamation or discrimination. We do not accept any form of child or forced labour.

Document Ref	Issue Date	Review Date	Next review	Issued by
HRSD0087	May 2019	Jan 25	Jan 26	J Priestley



We will consult people who may potentially be affected at all stages of project design and implementation, in a manner that ensures free and informed participation. Adjustments will be made to reduce potential barriers to communication and ensure vulnerable groups are considered.

### Addressing issues

We have established grievance mechanisms and whistleblowing procedures to address any concerns from individuals or third parties. If we discover any adverse human rights impacts we will act appropriately and without delay. Agrial operate an independent whistle blowing system where instance of adverse human rights issues can be reported if an individual does not feel comfortable raising via their manager or HR. [www.agrialopenline.com](http://www.agrialopenline.com). Full details of the process can be found in the relevant policies detailed below. All mechanisms have procedures in place to ensure issues reported will be treated impartially, confidentially and without fear of reprisals.

Should an adverse human rights issue be raised an incident management team will convene comprising of HR, Senior Operational Management and H & S as a minimum. These have all been trained in modern slavery and understand working with key agencies and stakeholders. Any issues highlighted will be investigated using the 3 principles of observe, gather and protect. If necessary we will escalate to the relevant parties – e.g. GLAA (Gangmaster Labour Abuse Authority), Crimestoppers, Modern Slavery helpline.

### Remediation

Should we find the human rights of any of our employees or workers in our supply chain has been compromised we will work with the relevant agencies as part of remediation. As a Company we have partnerships with the GLAA, ALP (Association of Labour Providers), local police and community groups.

We will work with these partners to meet the requirements of the victims if applicable. Where child labour is involved we will ensure ongoing liaison and engagement with the stakeholders and local authorities.

If child workers are found we, in partnership with appropriately qualified organisations (Local NGO), will work to develop a responsible solution that is in the best long-term interests of the Children. Such programmes will be based on available best practice and will seek to meet the educational, social and economic needs of the Children concerned.

As part of our remediation process we will pass the contact information to Local NGO regarding the Child revealed to be working in the Company; the local NGO will contact the Child and their family and arrange a visit to the family to build trust, understand the background and the needs of the Child and family, and to explain the process; the local NGO will facilitate the Child's enrolment in a school, and monitor Child's attendance in school. Appropriate steps will be taken to prevent reoccurrence.

We will work will suppliers identify issues however suppliers who fail to address adverse human rights impacts will be delisted. We also expect our suppliers to have effective remediation procedures in place.

Document Ref	Issue Date	Review Date	Next review	Issued by
HRSD0087	May 2019	Jan 25	Jan 26	J Priestley



## Monitoring

We will:

- Ensure a senior manager is assigned responsibility for ensuring we uphold the human rights of employees and stakeholders. This will normally be the Site HR Manager with overall responsibility for human rights being part of the HR Directors role.
- Ensure governance is in place in all areas of our business operations to ensure standards and requirements expected are met.
- Communicate the policy to all employees, stakeholders, as well as to all suppliers of goods and services.
- Make appropriate human and financial resources available to meet its stated commitments, including training and guidance for relevant personnel. We engage with stakeholders via ALP membership, GLAA workshops, support organisations and our customers ethical teams.

## Review

The effectiveness of this policy and relevant policies, procedures and statements will be reviewed annually by the HR Director in conjunction with the Company Directors to ensure we continue to meet and comply with the UNGP. A review of any incidents will take place to prevent reoccurrence.

The Company wishes to be transparent regarding its policies, activities and impacts and is committed to reporting on its human rights issues and risks as appropriate as part of its annual report.

## Links to other policies

Agrial Code of Conduct  
Anti-Bribery & Corruption Policy  
Recruitment Policy  
Grievance Policy & Procedure  
Data Protection Policy

Whistleblowing Policy  
Ethical Sourcing Policy (ETI base code)  
Equality Policy  
Modern Slavery Statement  
CSR Plan

## Endorsed

Doug Robertson  
Managing Director  
January 2025

Document Ref	Issue Date	Review Date	Next review	Issued by
HRSD0087	May 2019	Jan 25	Jan 26	J Priestley