



Human Rights Policy

As a responsible employer we fully support and work alongside the principles outlined in the United Nations Guiding Principles (UNGPs) 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 policy

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.

The governance of this policy is the responsibility of the Company's Directors. The Directors along with the senior leadership team are responsible for the policy's implementation and adherence. It will be reviewed annually to maintain its effectiveness and relevance.

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.

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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.

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 whistleblowing system where instances of adverse human rights issues can be reported if an individual does not feel comfortable raising via their manager or HR. <https://agrail.integrityline.app> 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

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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 with suppliers to 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.

Commitments and KPI's

As a Company we set targets and KPI's and monitor our policies and procedures against these. With regards to Human Rights we have set the following;

- All employment agencies to be audited to ensure operating in an ethical manner
- Due diligence to take place on our Seasonal Workers Scheme Operator, with employee surveys and interviews taking place.
- Regular ethical and stay interviews take place with both our employees and agency workers (at least 15% of workforce each year). This is to be increased if any issues of concern are raised
- Zero modern slavery cases
- Zero child labour cases
- H & S frequency rate of 4.5 or less with lost time accidents reducing year on year
- Ensuring 100% of the workforce are covered by formally elected employee representation
- At least 95% plus of employees to be trained in diversity, discrimination and harassment.
- Key Suppliers to have an independent ethical audit – Global Gap / GRASP / SMETA
- All employees annually to be briefed on Code of Conduct / Whistleblowing Policy and Process / Anti Bribery and Corruption and Human Rights Policy

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.
- Through annual reviews we will track progress against our KPI's and commitments stated above

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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	Whistleblowing Policy
Anti-Bribery & Corruption Policy	Ethical Sourcing Policy (ETI base code)
Recruitment Policy	Equality Policy
Grievance Policy & Procedure	Modern Slavery Statement
Data Protection Policy	CSR Plan

Endorsed

Dan Wright
Managing Director
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