



FRESHWAYS GROUP HUMAN RIGHTS POLICY

1. Purpose and Commitment

The Freshways Group of Companies (“**Freshways**”) is committed to respecting and promoting human rights across all areas of our operations and business relationships. This policy sets out our approach to upholding the dignity and rights of individuals in accordance with the United Nations International Bill of Human Rights and also references the United Nations Guiding Principles on Business and Human Rights, and other relevant international standards including those from the International Labour Organization (“**ILO**”).

2. Scope

This policy applies to all employees, directors, contractors, suppliers, and business partners of Freshways with specific attention to UK legal frameworks and obligations.

3. Core Principles

3.1 Non-Discrimination and Equal Opportunity

We are committed to providing a workplace free from discrimination on the grounds of race, gender, age, disability, sexual orientation, religion, nationality, or any other status protected under international human rights standards and UK law. The basis for recruitment, hiring, placement, training, compensation and advancement at Freshways is qualifications, performance, skills and experience. Freshways has a separate Equal Opportunities Policy.

3.2 Freedom of Association and Collective Bargaining

We respect the rights of employees to join or form trade unions and to bargain collectively, in line with ILO Conventions and UK legislation. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives.

3.3 Safe and Healthy Working Conditions

We ensure that all our employees work in a safe and healthy environment. Health and safety practices comply with UK law and international best practices. 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, including medical conditions affecting staff within the workplace.



3.4 No Forced or Child Labour

We do not tolerate forced, bonded, or compulsory labour or child labour. We comply fully with the UK Modern Slavery Act 2015 and conduct due diligence to prevent such practices within our operations and supply chains.

3.5 Right to Privacy and Data Protection

We respect individual privacy and comply with the UK General Data Protection Regulation and Data Protection Act 2018.

3.6 Living Wages and Working Hours

We pay at least the national minimum wage (or living wage where applicable) and adhere to fair working hours and rest periods in line with the Working Time Regulations 1998.

4. Implementation and Responsibilities

Senior leadership is responsible for overseeing the implementation of this policy. The Human Resources team is tasked with integrating human rights considerations into company operations. All employees are expected to understand and uphold these commitments.

5. Grievance Mechanisms

We provide accessible and confidential grievance mechanisms for individuals and stakeholders to raise concerns related to human rights without fear of reprisal. This also extends to matters falling under the issue of harassment (in relation to defined protected characteristics). We commit to investigating all concerns promptly and fairly.

Approved by:

Ravinder Nijjar, Director

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