

Human Rights

Our Statement



Introduction

Protecting human rights is fundamental to the values that we hold at Upfield. This is true, both with regard to us as a company, and across our diverse and geographically varied network of partners, as laid out in Upfield's Responsible Sourcing Policy. Our business is based on trust and we are committed to earning that trust by working within the highest standards of integrity.

In accordance with the UN Guiding Principles on Business and Human Rights, we aim to protect and promote human rights in the communities in which we operate.

Our Principles

At Upfield, it is every Associate's responsibility to help ensure that our work environment and practices protect and promote human rights. If any Associate believes that our Human Rights Policy and/or the local law on this topic is being violated, they are asked to report it immediately to their manager, Human Resources, Legal Counsel or via our confidential reporting tools 'Speak Up'.

We also audit the implementation of our Human Rights Statement to ensure compliance.

1. Respecting Human Rights

Respecting human rights is fundamental to the values that we hold at Upfield.

We aim to protect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights in our interactions with our Associates, suppliers and customers and in the communities in which we operate.

The Principles in our Human Rights Statement are guided by internationally-recognised standards, such as the Universal Declaration of Human Rights¹, the International Bill of Rights², the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work³ and the UK Modern Slavery Act 2015⁴.

These principles apply to Upfield, the entities that we own, the entities in which we hold a majority interest and the facilities and sites that we manage.

We also expect our suppliers to uphold these principles and urge them to adopt similar policies.

¹ <https://www.un.org/en/universal-declaration-human-rights/>

² <https://www.ohchr.org/documents/publications/compilation1.1en.pdf>

³ <https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm>
<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

⁴ <https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm>
<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

We use a risk analysis process to identify and prevent human rights breaches to people in our business and supply chain.

Where we have identified adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in, their fair and equitable remediation. We seek to promote access to remediation where we are linked to or involved in those adverse impacts through our relationships with third parties.

The Human Rights statement is overseen by Upfield's Executive Committee, including the Chief Executive Officer.

2. Freedom of Association and Collective Bargaining

Upfield respects our Associates right to join or form a labour union without fear of reprisal, intimidation or harassment. Where Associates are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives.

3. Workplace Health and Safety

The health and safety of our Associates at work is extremely important to us. Upfield's policy is to provide a safe and healthy workplace and which complies with all relevant laws and regulations as well as our own requirements.

We work to provide and maintain a safe and healthy workplace, in consultation with our Associates, by addressing any identified risks.

4. Workplace Security

Upfield is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for Associates are provided, as needed, and are maintained with respect for employee privacy and dignity.

5. Forced Labour and Human Trafficking

Upfield prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery and any form of human trafficking.

6. Child Labour

Upfield prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

7. Work Hours, Wages and Benefits

Upfield compensates Associates competitively relative to the industry and local labour market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

8. Diversity and Inclusion

Upfield values the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment based on 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. The basis for recruitment, hiring, placement, development, training, compensation and advancement at Upfield is qualifications, performance, skills and experience.

Upfield does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace or in any work-related circumstance outside the workplace.

9. Community and Stakeholder Engagement

Upfield is part of the communities in which we operate. We engage with communities on human rights matters that are important to them such as land rights, access to water and health. We also engage with people in those communities, including indigenous peoples as well as other vulnerable and disadvantaged groups. Our aim is to ensure through dialogue that we are listening to, learning from and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level.

Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business. This includes potential issues within Upfield, across our supply chain and with our various sponsorships, through which we seek to promote respect for human rights.

10. Land Rights and Water Resources

We recognise the significant implications regarding respect for human rights that land use and water use across our supply chain may have, which we address through specific policy and action.

Upfield is compelled, based on our values and as a major buyer of agricultural commodities, to act and to use our influence to help protect the land rights of local farmers and communities.

11. Healthy Lifestyles

We are committed to providing transparent nutrition information to enable consumers to make informed choices consistent with a healthy lifestyle.

12. Guidance and Reporting for Associates

Upfield aims to create workplaces in which open and honest communications among all Associates are valued and respected. We are committed to comply with applicable labour and employment laws wherever we operate. Upfield also ensures

Associates are aware of the Human Rights Policy through training and an annual certification process.

Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with local management, Human Resources or Legal Counsel. Associates can also report suspected policy violations through our confidential reporting tools 'Speak Up'.

No reprisal or retaliatory action will be taken against any employee for raising concerns relating to any aspect of this policy. Upfield will investigate, address and respond to the concerns of Associates and will take appropriate action in response to any violation.

The Human Rights Statement forms part of Upfield's Responsible Sourcing Policy.

Upfield reserves the right to amend this statement at any time.

Upfield's Human Rights statement was launched on 1 May 2019.

We report to the public on our human rights-related commitments, efforts and statements, consistent with this statement, as part of our annual Sustainability Report. This reporting cross references the UN Guiding Principles Reporting Framework.