



Human Rights & Ethics Policy

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1.0	October 2018	Bev Bishton	Avara Policy Issued
2.0	July 2023	Sarah Cole	Updated Policy

Review

This document will be reviewed every 12 months, or earlier as required.

Approvals

This document has the following approval:

Name	Job Title	Date
Kimberly Oakman	Head of People Services	July 2023
Andrew Brodie	People, Communications & Sustainability Director	July 2023

This policy does not form part of a contract of employment and may be amended by the Company as appropriate from time to time.

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1.0 Policy Aim

We are a business where our people make the difference. We recognise the need to respect and protect human rights, and are committed to treating all colleagues, in our business and across our supply chain, with dignity and respect. This is at the heart of being a trusted company that you want to work with and for. This policy will underpin and informs our update statements on Modern Slavery.

We remain committed to improving our standards, taking our responsibilities seriously and enhancing our reputation as a Company you want to work with and work for through our work in the area of Human Rights. We continue to learn about actions that we have taken to uphold this policy in recent years by viewing our Modern Slavery Statement updates and our management teams receive training on human rights impacts.

2.0 Who does this policy apply to?

This document applies to all employees, agency workers, contractors and visitors to any Company owned or managed facilities.

3.0 Our Commitment

We believe we have a responsibility as an ethical business to respect and uphold human rights and that doing the right thing is the foundation of long-term business success.

We believe that the most significant contribution we can make, to protect the human rights of our colleagues, is to establish and maintain a supportive culture and open working environment where people can be individuals and speak openly, within a framework that encourages inclusivity and respect.

At the heart of this are our Values:

- Inclusive
- Excelling
- Ambitious, and,
- Integrity

These are what we expect to see throughout our supply chain, and we will not accept behaviour or attitudes that compromise what we stand for. We fully support United Nations (UN) universal declaration of Human Rights and the International Labour Organisation (ILO) core conventions on labour standards, working hours, and health & safety for workers and adhere to the Ethical Trade Initiative (ETI) base code.

4.0 Our Actions

We have a responsibility to deliver these commitments to our stakeholders, who include our employees, suppliers, customers, consumers, shareholders and the communities in which we operate. This is achieved through incremental improvements captured within our Modern Slavery update statement each year as well as the following broad framework of activity:

1. **A Human Rights & Ethics Steering Group** – this cross business leadership group meets regularly to identify risks, agree priorities and review progress and includes representative of all relevant internal functions.
2. **Auditing** – external auditing from customers and regulatory organisations is supported through regular internal checks and monitoring.
3. **Awareness** – A commitment to communication to all management levels starting with the Board to ensure full awareness of the risks and the importance of focus on this area.
4. **Training** – relevant training to managers and also specialist development to those centrally involved in making improvements and internal auditing.
5. **Promote** – Human Rights within our own operation and our sphere of influence.
6. **Networking** – through our membership of organisations including Sedex and FNET, we look to work with other suppliers and retailers to improve and be more effective.
7. **Policies** - we have identified some specific areas that have a direct impact on the human rights of people in our employment and in and our wider supply chain. More information about each can be found in the links below.

Policy/Procedure	Impact/Relevance to human rights
Grievance	Ensures that every colleague has a voice and that they can confidently raise concerns without recrimination
Whistleblowing	If a colleague has a concern regarding a wrongdoing in the workplace without fear of reprisal, they can contact an independent third party to voice their concerns. This is a 24/7 confidential hotline run by an independent third party. All of the concerns are investigated.
Health & Safety	Establishes our expectations for good health and safety to ensure lives and health are not in jeopardy through working for us
Procurement	Ensures that our external supplier contracts reflect our responsibilities and commitments with regard to Human rights, supported by a supplier code of conduct and pre-screening new suppliers.
Anti-Bribery & Corruption	Sets clear standards for behaviour for all our colleagues in dealing with each other and external stakeholders
Bullying & Harassment	Sets clear standards for behaviour for all our colleagues and how to raise concerns

5.0 Our Supply Chain

We operate and manage a vertically integrated supply chain, which encompasses farms, hatcheries, feed mills, processing sites and a distribution network: all based in the UK. This alongside a supply base that is predominantly British, significantly reduces our level of risk.

We recognise the importance of extending our high standards and ethical requirements to our suppliers and other business partners.

We seek to develop long-term partnerships with suppliers who also share our values and commitment to high ethical standards, including improved labour and employment standards, and our framework of commitments.

We adopt a practice of minimising the use of agency labour, however where we utilise the provision of recruitment agencies our recruitment partners are encouraged to be Stronger Together Business Partners and use the Good Food App, promoted by the Association of Labour Providers (ALP), these measures are in addition to our own six-monthly audits of our agencies.

Details on this is contained in our Modern Slavery Statement updates published on our website each year.

6.0 Governance

We use reporting systems in our policies to ensure that potential Human Rights issues are identified and action taken swiftly where necessary. Primarily, issues are raised with line managers, through employee forums and where necessary through our grievance and whistleblowing processes. In this way, colleagues' concerns are quickly identified and resolved.

7.0 Policy Review

Standard practice within our policy framework is to review policy content on an annual basis even if no material changes are identified.