

## Introduction

This policy sets out our commitment and the steps we take to meet our responsibility to respect internationally recognised human rights standards. It is guided by the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisations Declaration on Fundamental Principles and Rights at Work.

This policy provides the basis for embedding responsibility to respect human rights throughout all our business operations and applies to our employees, contractors, suppliers, agents and any other third party who work with us.

We expect our third-party suppliers and partners to adhere to the highest standards of quality and integrity in all aspects of their business. We carry out appropriate due diligence to ensure suppliers comply with our policies and ethical standards.

## Equality and Diversity

We strive to be an equal opportunities employer and to value diversity. As such, we aim to promote working practices that are free from unfair and unlawful discrimination and encourage mutual trust and respect of all individuals.

We take reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation honouring all aspects of the Equality Act 2010.

## Dignity and Respect

We are committed to providing a work environment in which all employees are treated with dignity and respect and is free from harassment and bullying. We do not tolerate disrespectful or inappropriate behaviour, unfair treatment, intimidation or retaliation of any kind in the workplace and in any work-related setting outside the workplace, e.g., business trips and work-related social events.

## Freedom of Association and Collective Bargaining

We respect our employees' right to join, form or not to join a Trade Union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives.

## Forced Labour and Human Trafficking

We prohibit the use of all forms of forced labour and are committed to preventing modern day slavery and any form of human trafficking within our business and our supply chains. We publish on our Company Website a Modern Slavery Statement setting out the measures we have put in place to prevent modern slavery in the workplace and in our supply chain.

## Child Labour

We will not engage in or condone the unlawful employment or exploitation of children in the workplace in our own operations or supply chain. Our Child Labour, Remediation and Young Worker Policy outlines our commitment to protecting the rights of young workers and remedying any instances of child labour.

## Work Hours, Wages and Benefits

We compensate employees relative to the industry and local labour market. The wages and benefits paid for a standard working week will always meet the minimum national legal standard. We ensure that employees working hours comply with national laws, are not excessive and that adequate rest periods are provided.

## Health and Safety in the Workplace

The health, safety and welfare of our employees is our number one priority. We are committed to providing a safe and healthy working environment and complying with applicable health and safety legislation and regulations, as well as internal requirements.

We work to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

## Sustainability and the Environment

We are committed to operating a sustainable business, we have introduced a number of initiatives to minimise and prevent the negative impact that our operations have on the environment. We continually seek to reduce energy consumption and CO2 emissions through installation of energy efficient products and equipment. We're also committed to good environmental practices, such as recycling, and reducing waste.

We seek to build positive relationships with the communities in which we live and work.

## Remedy

We will not tolerate or condone the abuse of Human Rights within any part of our business or supply chain and we will take any allegation that Human Rights are not being properly respected seriously. We place importance on the provision of effective remedy wherever human rights impacts occur through company-based grievance mechanisms.

We continue to build the awareness knowledge of our employees on human rights, encouraging them to speak up, without retribution, about any concerns they may have. Any employee with concerns regarding the human rights impacts of the Belfield Group should raise these through the internal Grievance Procedure process including Whistleblowing helpline.

Human rights concerns or grievances raised by customers, suppliers or external parties should in the first instance be reported to the relevant Belfield Group designated contact (See Appendix A).

The Belfield Group Board has overall responsibility for the implementation of this policy. Managing Directors of each business are responsible for establishing appropriate responsibilities within their operations, ensuring that they are informed of any material risks to or breaches of our Human Rights Policy, and taking actions to address issues raised.

## Signed on behalf of Belfield Group



**Gary Lasham**  
Chief Executive Officer

Appendix A - Designated Contact:

Anthony Pydiah, ESG Director – [anthony.pydiah@thebelfieldgroup.com](mailto:anthony.pydiah@thebelfieldgroup.com)