

## HUMAN RIGHTS AND ETHICAL TRADING POLICY

At Stonegate Farmers Ltd we are proud of our heritage and our reputation and are committed to putting our product at the heart of every day. We recognise that, to achieve this, we must adhere to the highest possible standards in everything we do, including respecting human rights and ensuring that all individuals are treated with dignity and respect.

Our standards are based on the requirements of internationally proclaimed human rights, national law, the ten principles of the UN Global Compact, the ETI (Ethical Trading Initiative) base code, which is based on the ILO (International Labour Organisation) core conventions, and, where applicable, the Gangmasters and Labour Abuse Authority (GLAA) Standard or equivalent National Standard.

Our policy details 12 fundamental principles, based on the ETI Base Code (Appendix 1):

1. Business is conducted lawfully and with integrity, respecting internationally proclaimed human rights.
2. Work is freely chosen, and conducted on the basis of freely agreed and documented terms of employment
3. Workers are free to exercise their right to form or join trade unions or to refrain from doing so and to bargain collectively
4. Working conditions and accommodation (where provided) are safe and hygienic and meet the needs of workers
5. Child labour shall not be used, all workers are of the appropriate minimum age
6. Wages meet the minimum national standard
7. Working hours for all workers are reasonable and within legal limits, if stated, if not will revert to the ETI Base Code
8. There must be no discrimination of any kind, all workers are treated equally, with respect and dignity
9. Workers have access to fair policies and procedures and there must be no harsh treatment of any kind
10. All workers must have a legal right to work
11. Business is conducted in a manner which embraces sustainability and reduces environmental impact
12. Animals within our supply chain must be treated responsibly and with respect

This policy provides the basis for embedding responsibility to respect human rights throughout all of our business functions and applies not only to Stonegate Farmers Ltd, but also to any parent or subsidiary companies, employees, contractors, suppliers, agents and any other third party working with us as part of our operations.

This procedure will be reviewed on an annual basis to ensure compliance, with the HR Director maintaining overall responsibility.

### **Our Supply Chain**

We expect our third party suppliers and partners to adhere to the highest standards of quality and integrity in all aspects of their business.

Stonegate Farmers Ltd is a member of SEDEX (the Supplier Ethical Trading Data Exchange), a not for profit membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. We encourage all of our ingredients and packaging suppliers to become members of SEDEX. We also require our suppliers to comply with our Ethical Trading Policy. We are regularly audited by SMETA as part of our ethical commitment.

# Stonegate

Furthermore, we carry out appropriate due diligence before working with a new supplier and we audit our suppliers to monitor their compliance with our policies and ethical standards.

We encourage continuous improvement in meeting these standards and we recognise our suppliers may need time and support to ensure compliance. However where standards are not met, and there is no commitment to improve, we reserve the right to cease trading with suppliers.

## **Diversity, Inclusion and Equal Opportunities**

1. Stonegate Farmers Ltd values diversity and is committed to promoting equal opportunities in the workplace. Every job applicant, employee or worker will be treated fairly and equally with dignity and respect regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, social class, nationality, ethnic or national origin, religious belief, union membership, political opinion, sex, sexual orientation or any other protected characteristic.
2. Stonegate Farmers Ltd Equal Opportunities Policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures and termination of employment.
3. We believe that people have a right to be treated with dignity. We are committed to providing a working environment free from harassment and bullying and ensuring all employees are treated, and treat others, with dignity and respect.

## **Health, Safety and Hygiene in the Workplace**

1. We are committed to ensuring the highest standards for health and safety of employees and anyone affected by our business activities, and to providing a safe and suitable environment for employees and all those attending our premises.
2. Our Health and Safety Policy sets out our arrangements in relation to:
  - a. assessment and control of health and safety risks arising from work activities;
  - b. preventing accidents and work-related ill health;
  - c. consultation with employees on matters affecting their health and safety
  - d. provision and maintenance of a safe workplace and equipment;
  - e. information, instruction, training and supervision in safe working methods and procedures;
  - f. emergency procedures in cases of fire or other major incident.
3. All employees share the responsibility of achieving safe working conditions and we are committed to engaging with employees to continually review and improve health and safety in our workplaces. Employees are provided with appropriate training and required to take care of their own health and safety and that of others, observe applicable safety rules and follow instructions for the safe use of equipment. Employees are also required to report any health and safety concerns immediately and to co-operate on health and safety matters, including the investigation of any incident.

## **Forced Labour, Human Trafficking and Child Labour**

1. Stonegate Farmers Ltd is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. There is no forced, bonded or involuntary prison labour used in any part of the business. Employees and workers are not required to lodge "deposits" or their identity papers and are free to leave their employment after reasonable

# Stonegate

notice is given in accordance with their contract. Identity papers may be checked to ensure we comply with our legal obligation to ensure individuals have the right to work in the UK but these are always returned.

2. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
3. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.
4. Stonegate Farmers Ltd does not employ anyone under the age of 18 years of age (Stonegate Agriculture Ltd may employ children from 16 years of age as egg collectors on a part time basis) and there are robust processes and systems in place to ensure this is the case. Should a child (classified as 15 years of age or under) be found to be working within one of our facilities or in our supply chain, we pledge to work closely with the facility or partners, in accordance with local laws and the guidance of the ETI base code/ILO standards, in order to remedy the situation to ensure no harm is caused.

## **Treatment of Workers**

1. Physical abuse, the threat of physical abuse, verbal abuse, violence, sexual or other harassment, bullying or other forms of intimidation are prohibited.

## **Wages, Benefits and Working Hours**

1. We compensate employees competitively relative to the industry and local labour market. We ensure full compliance with applicable wage, work hours, overtime and benefits laws (including but not limited to the laws applicable to the national minimum and living wage). In any event, wages should always be enough to meet the basic needs and provide some discretionary income.
2. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the period concerned each time that they are paid.
3. Deductions from basic wages as a disciplinary measure is not permitted; nor are any deductions from wages not provided for by national law, without the express permission of the worker concerned.
4. Working hours will be defined by contract. Workers may be offered overtime hours from time to time, but there is no obligation to work any overtime, unless covered by local collective bargaining agreements. Workers are given the option of opting out of the Working Time 48 hour regulations, but this is a voluntary decision. Overtime shall be used responsibly, taking into account the extent and frequency of the hours worked by individual workers and the workforce as a whole. Appropriate safeguards are always taken to protect the worker's health and safety. Overtime shall not be used to replace regular employment and shall always be compensated for appropriately.

# Stonegate

5. Employment relationships are based on established national laws and practises. Obligations to employees under applicable social security regulations, and apprentices' schemes, are entered into with a full undertaking to carry these out.

## **Freedom of Association and Collective Bargaining**

1. We recognise our employee's rights to join or form trade unions, and to bargain collectively as permitted by national laws. These rights will not be restricted or interfered with.
2. Stonegate Farmers Ltd adopts an open attitude towards the activities of trade unions and their organisational activities. Workers representatives are not discriminated against and have the ability to carry out their representative functions in the workplace.
3. Where the right to freedom of association and collective bargaining is restricted by law, we will facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

## **Communication and Review**

1. Stonegate Farmers Ltd undertakes to ensure that its Human Rights Policy and those policies which derive from it are communicated effectively to all employees, contractors, suppliers, agents and any other third party working with us as part of our operations.
2. Stonegate Farmers Ltd strives to create an open and honest working environment in which everyone's views are valued and respected. All employees are able to raise any concerns they have regarding any human rights violations through our confidential independent helpline with complete anonymity and without fear of reprisal. Any customer with concerns regarding our activities and compliance with our Human Rights Policy or legal obligations can raise these through our customer service channels that can be found on our website. This policy shall be reviewed and updated as and when necessary, to reflect changes in relevant legislation and improvements in approach.

# Stonegate

## DEFINITIONS:

<b>Wording:</b>	<b>Definition:</b>
<b>ETI</b>	Ethical Trading Initiative
<b>EIT Base Code</b>	Ethical standard drawn up by ETI members and applicable to manufacturers and farmers in the UK retail supply chain
<b>GLAA</b>	Gangmasters and Labour Abuse Authority
<b>GLAA Standard</b>	The licensing standard drawn up by the GLAA and applicable to all suppliers of temporary labour to UK food processors and farmers
<b>GLAA Active Check</b>	GLAA run an alert system which warns labour users when the licence of an agency that they have nominated changes or is revoked.
<b>Independent Slavery Commissioner</b>	A post created by the UK Government within the Modern Slavery Act
<b>Labour Providers</b>	May be the standard model of basic labour services to production facilities or contractors who provide a service and staff such as canteens, security, logistics and office cleaning.
<b>Modern Slavery</b>	Modern Slavery is the term used within the Modern Slavery Act 2015 to define the illegal activities occurring in the provision of labour to companies in the UK
<b>SEDEX</b>	Retailer run database that holds retailer suppliers ethical audits and self-assessment
<b>SEDEX SAQ</b>	SEDEX based Self-Assessment Questionnaire
<b>SMETA</b>	Ethical audit standard managed by SEDEX and available through the SEDEX system
<b>Stronger Together</b>	Joint initiative involving retailers, GLAA, suppliers and charities to raise awareness of modern slavery issues and equip labour providers with the tools to prevent slavery and exploitation in their work force
<b>Tier 1 Suppliers</b>	Suppliers that supply goods and services directly into Pilgrim's Pride Ltd.
<b>Tier 2 Suppliers</b>	Suppliers of goods and services directly into Pilgrim's Pride Ltd Tier 1 suppliers.
<b>Workers (Employees, Staff)</b>	Describes all the people working for the business, both permanent and temporary

## Appendix - ETI Base Code



### **1. Employment is freely chosen**

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

### **2. Freedom of association and the right to collective bargaining are respected.**

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining

### **3. Working conditions are safe and hygienic**

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

### **4. Child labour shall not be used**

- 4.1 There shall be no new recruitment of child labour
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.



- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall confirm to provisions of the relevant ILO standard

## **5. Living wages are paid**

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

## **6. Working hours are not excessive**

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hrs per week.\*
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours work in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all the following are met:
  - this is allowed by a collective agreement freely negotiated with workers' organisation representing a significant portion of the workforce;
  - appropriate safeguards are taken to protect the workers' health and safety; and
  - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

\*International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.



**7. No discrimination is practised**

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

**8. Regular employment is provided**

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to import skills or provide regular employment, or shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

**9. No harsh or inhumane treatment is allowed**

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Policy Name:	Ethical and Human Rights Policy
Reference Number:	HRM.POL.28
Version Number:	1
Issue Date:	18/08/2025
Approved By:	Kelli Payne, HR Director