

Human Rights Policy

Purpose

Consistent with our Purpose, Vision and Values, we are committed to respecting human rights and treating people with dignity and respect.

O'Brien Fine Foods is committed to upholding and respecting human rights in all aspects of our operations. This policy outlines our commitment to ethical business practices, compliance with human rights laws, and the promotion of a workplace and supply chain free from discrimination, harassment, and exploitation.

Scope

This policy applies to all employees, contractors, suppliers, and business partners associated with O'Brien Fine Foods.

Our Policy is grounded in the following human rights standards:

- United Nations Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- International Labour Organisations Declaration on Fundamental Principles and Rights at Work

Commitment to Human Rights

O'Brien Fine Foods is committed to upholding international human rights and to acting with integrity in all of our dealings, relationships, and supply chains. We have a zero-tolerance approach to slavery and human trafficking and other human rights infringements. We are deeply committed to respecting and safeguarding the people who work for us and those who are affected by our activities.

We are committed to fully investigate and remedy any adverse human rights impact identified and take all such allegations very seriously.

Key Principles

Employees and other workers are:

- provided with a safe working environment.
- paid fairly and on time for the work they do.
- provided with working hours that comply with national laws and industry standards.
- (have) the right to freedom of association and collective bargaining.
- not subjected to any form of involuntary servitude or duress, such as having to repay large loans or having their passport retained.
- not discriminated against because of their gender, civil status, family status, sexual orientation, religion, age, disability, race membership of a minority community/group or any other status protected by applicable law.
- not subjected to physical, verbal, sexual, racial, psychological, or any other forms of abuse, bullying or harassment.

- not under the legal minimum age of employment, with a zero tolerance for the exploitation of children.
- provided with fair procedure and absence of discrimination in any grievance, disciplinary or other investigation or resolution process.

If there is a difference between the content of this policy and any local law or regulation, the more stringent requirement will apply.

Responsibilities

- **Management:** Responsible for ensuring compliance with this policy, conducting human rights due diligence as required by the EU Corporate Sustainability Reporting Directive (CSRD) and Irish corporate governance regulations, and integrating ethical labour practices into food production operations.
- **Employees:** Expected to uphold human rights standards, adhere to food safety guidelines, and report any violations.
- **Suppliers & Business Partners:** Must comply with ethical sourcing guidelines and adhere to the human rights principles outlined in this policy, meeting EU and Irish regulations on supply chain transparency and sustainability.

Reporting and Compliance

The avenues available to employees to report a concern or suspected breach of this policy are as follows:

1. Grievance Policy
2. Protected Disclosures Policy
3. Safe Call Whistleblowing Service

Any other person who believes a breach of human rights may have occurred or be occurring within our operations or our supply chain can contact the Safe Call line.

Safe Call

We take our obligations to treat the reporting of wrongdoing in our workplace very seriously. To ensure that at the earliest stage possible the reporting is handled and assessed in a secure, responsive, confidential, structured, and compliant manner we have engaged with an independent whistleblowing services provider called Safe Call. Safe Call are available 24/7, 365 days a year in over 175 languages to ensure accurate reporting supporting our diverse workforce.

Safe Call are contactable by phone or via an online reporting mechanism. Details of these reporting channels are displayed in communal areas across our business. We also advise our new starters during induction on how they can make a report if required.

Safe Call Contact details:

- Call: 0044 800 915 1571 (when calling from Ireland)
- Web reporting: www.safecall.co.uk/report

Enforcement

We will ensure fair procedures in any grievance or disciplinary process and uphold the principles set out in this policy. Violation of this Policy or the refusal to co-operate will result in disciplinary action up to and including termination and referral to the appropriate authorities. We reserve the right to cease relationships with suppliers who infringe this Policy as warranted.

Monitoring and Review

This policy will be reviewed regularly to ensure its effectiveness and alignment with evolving human rights standards.