



Finlays[™]
Since 1750

Human Rights Policy

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1. INTRODUCTION

Finlays' mission is to connect humanity through natural beverages. Combining tradition and innovation to create a healthier, happier and better world by bringing the best from bush to beverage.

As a leading B2B manufacturer and supplier of tea, coffee, extracts and botanical solutions, we operate in many parts of the world, across a diverse spread of geographies, cultures and languages, in farming, manufacturing, blending, packing, innovation and sales.

Our Values

TRUSTED - We act with integrity. We act with honesty, transparency, and humility. We are diverse, inclusive and respect the views of others. We are trusted by customers and colleagues alike.

SUSTAINABLE - We act for the long term. We strive for Quality in everything we do. We build lasting business partnerships. We care about our customers and all our staff. We strive for 'Zero Harm' and 'Always Safe'. We are One Finlays helping each other.

INNOVATIVE - We embrace change. We seek to improve continuously. We are action oriented. We learn from our peers, our customers, and competitors.

Under the *United Nations Guiding Principles on Business and Human Rights* (UNGPs) businesses have a responsibility to respect human rights. We recognise this responsibility, and with our diverse global footprint, we acknowledge our position of influence. Finlays embraces the responsibility to understand and manage how we may impact the human rights of those in our businesses and supply chains. This Policy outlines our commitment to upholding that responsibility.

1.1 Scope

The Finlays Human Rights Policy applies to *James Finlay Limited*, to all Finlays employees, and to every wholly owned subsidiary and joint venture in which we have a majority interest. We expect our suppliers, agents, distributors, subcontractors, consultants, and customers to respect human rights across their own value chains.



2. OUR COMMITMENT

Finlays is committed to being a business where people are valued and treated fairly encouraging growth and development. We respect the human and labour rights of Finlays employees and all those whose lives may be impacted by our business activity, wherever we do business in the world.

We respect those rights established in the *International Bill of Human Rights*, and the *International Labour Organisation Declaration on the Fundamental Principles and Rights at Work*. We also take guidance from the *UN Convention on the Rights of the Child*, the *UN Convention on the Elimination of All Forms of Discrimination Against Women*, and the *International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families*.

Our approach to respecting human rights is based on the *UNGPs*, the *Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises*, and the *Ethical Trading Initiative Base Code*. We will always uphold the national laws in the countries where we do business.

2.1 Commitments to Respecting Human Rights

In line with the UNGPs, the specific commitments set out in this section reflect our prioritised focus areas of human rights risk, informed by our group-wide Human Rights Risk Assessment and the identification of our most Salient Issues, as well as our obligations under the ETI Base Code. It is not intended to be an exhaustive list of all human rights of concern, and this list remains under regular review.

2.1.1 Occupational health, safety and wellbeing

We recognise the right to a safe and healthy working environment as a fundamental right for every worker. We are committed to ensuring our facilities, operations, work environments and services are safe and healthy for our workforce and anyone else who may be affected by our undertakings, and to achieving our aspiration of *Always Safe*. We strive to support the wellbeing of our employees, including their mental, physical and emotional health.

The safety and security of our workers is paramount. We use security guards only where it is necessary to protect the safety of our workers and ensure the continuity of our operations.



2.1.2 Freely chosen employment and decent work

We are committed to providing decent working conditions for all our employees. We will not tolerate any forced labour, modern slavery or human trafficking. All employment must be freely chosen, and free from debt bondage. Working hours must not be excessive (as defined by the *ETI Base Code*), and overtime must be voluntary. We support the Employer Pays Principle whereby no worker should pay recruitment fees.

2.1.3 Child rights

Child labour must not be used. We are committed to upholding the rights established in ILO Convention 138 relating to the minimum working age, and Convention 182 relating to the worst forms of child labour. We recognise the right of children to education. Where instances of child labour are found, we are committed to providing or contributing to remedy, as appropriate, in the best interests of the child.

2.1.4 Freedom from discrimination

We are committed to maintaining a workplace built on trust, honesty, fair treatment, and respect for individual rights. We will not tolerate harassment, bullying, discrimination, or harsh or inhumane treatment of any kind. We do not discriminate on the basis of sex, gender identity, sexual orientation, marital or civil partnership status, skin colour, race, nationality, ethnic or national origins, religion or belief, age, pregnancy or maternity leave or trade union membership.

We are committed to promoting diversity, equity and inclusion within the workplace. We recognise that discrimination and inequality can further compound the ability to access other human rights.

2.1.5 Gender equality

We are committed to building a workplace where everyone is treated equally regardless of sex, gender identity, gender reassignment or sexual orientation. Making progress towards gender equality is critical to the achievement of decent work, particularly for women.

We will not tolerate sexual and gender-based violence and harassment (S&GBVH) which may include physical or non-physical acts or threats of physical, verbal, psychological, sexual or socio-economic violence, against women or men.

Finlays supports the empowerment of women in the workplace. Women in management is a focus area of our 2030 Sustainability Strategy.

2.1.6 Livelihoods, Fair Wages and Incomes

We are committed to paying fair wages. We offer pay and benefits equal to or exceeding the relevant legal minimum for the countries in which we do business.

All workers must be provided with written and understandable information about their employment conditions and wages before they enter employment. We do not permit deductions from wages as a disciplinary measure. Any deductions from wages other than those provided for by national law must have the express permission of the worker concerned. We are committed to ensuring that seasonal and temporary workers employed by Finlays receive a fair wage enabling them to meet an adequate standard of living and are not disadvantaged by the nature of their employment.

We support a living wage for our employees and workers in our supply chain, and a living income for farmers and others, that enables them to meet an adequate standard of living. We recognise that low or insecure wages and incomes can be root causes of other human rights risks.

2.1.7 Freedom of association

We respect the right to freedom of association and collective bargaining and the right to participate in other groups (either formally or informally) to promote and defend common interests. We will not tolerate discrimination based on an employee's membership of any trade union or similar group. We cooperate with trade union representatives when required. In countries where trade unions are not legally permitted, we support alternative modes for enabling collective representation of workers interests.

2.1.8 Local Communities

We respect the rights of local communities and Indigenous Peoples wherever we operate. We believe that business should be a force for good, and through ongoing dialogue with rightsholders we are seeking to improve working conditions and to maximise benefits to the local population wherever possible.

2.1.9 Environment-related human rights issues

We recognise that a safe, clean and sustainable environment is integral to the full enjoyment of human rights; protecting the environment is therefore fundamental to respecting human rights.

Meanwhile, the transition to a low carbon economy can have unintended negative consequences for workers, farmers and local communities.

We are committed to supporting a Just Transition by seeking to identify and mitigate as far as possible any adverse impacts to people arising from our Net Zero plans or other environmental sustainability initiatives. Our environmental policy outlines our overall approach to understanding and addressing our environmental impacts while integrating risks to human rights to people across our business appropriately.



3. GOVERNANCE

The Group Managing Director is accountable for human rights across the business at a group level. The board of *James Finlay Limited* provides oversight of our approach to human rights.

Within our own operations, accountability and responsibility for human rights sits with the Group Human Resources Director and the Group Director of Corporate Affairs. For our supply chain, responsibility for human rights sits with the Group Director of Corporate Affairs. Commitment and delivery at Business Unit level are owned by the Managing Director of each business.

We have established a cross-functional working group which oversees our approach to human rights including a steering group responsible for strategic guidance at organisational level. An operational work group develops the objectives and determines requisite outcomes of our human rights strategy.

3.1 Our Policies

The Finlays Human Rights Policy is part of a wider policy framework, into which the respect of human rights is embedded. Implementing the Policy - and other associated policies - is the responsibility of all employees, business units, and functions wherever we do business. Combined, these policies guide us in meeting our human rights commitments, throughout our own operations and supply chains:

- Finlays Code of Conduct
- Finlays Sustainable Sourcing Policy
- Finlays No-Deforestation Policy
- Procurement Policy
- Protection of Dignity at Work Policy and Procedure
- Anti-Harassment and Bullying Policy
- Health and Safety Policy
- James Finlay Ltd Grievance Policy
- James Finlay Ltd Recruitment and Selection Policy & Procedure



4. HUMAN RIGHTS DUE DILIGENCE

In line with the UNGPs and OECD Guidelines, we are committed to conducting ongoing human rights due diligence (HRDD) to identify and assess actual and potential adverse human rights impacts with which our business may be involved, and to prevent, mitigate and remediate any such impacts.

We provide mandatory online and face to face training on modern slavery and human rights to all teams to build understanding, and to enable employees to take steps to prevent adverse impacts.

Steps taken to implement this Policy are reported internally to the global leadership team, steering group and Finlays board, and included in our external reporting, including our Modern Slavery Statement.



5. WORKING WITH THIRD PARTIES

All businesses have a responsibility to respect human rights. We expect our suppliers, agents, distributors, subcontractors, consultants, and customers to respect human rights across their value chains, and to have policies and procedures in place that are aligned with the Finlays Human Rights Policy, and with international norms. This Policy is referenced in our Sustainable Sourcing Policy, which our suppliers are asked to sign.

We recognise the vulnerability of agency and contract workers, especially migrant workers and those working in the agricultural sector and in the informal economy. We support regular employment, and work with our recruitment agencies to minimise the use of short-term contracts and seasonal workers. We support the Stronger Together Recruiter Compliance Principles. We expect all providers of private security services to respect human rights and humanitarian law.

Our Sustainable Sourcing Policy establishes our right to make site visits, undertake audits of our suppliers or to request specific information and documentation to verify compliance. We are committed to working with suppliers to enhance their capacity to respect human rights. However, Finlays reserves the right to implement a temporary suspension or terminate an agreement with any supplier that is not in compliance with the requirements of this Policy or does not take measures to remedy non-compliance. We recognise that such action may sometimes leave people worse off and should be considered only after all other options have been exhausted.

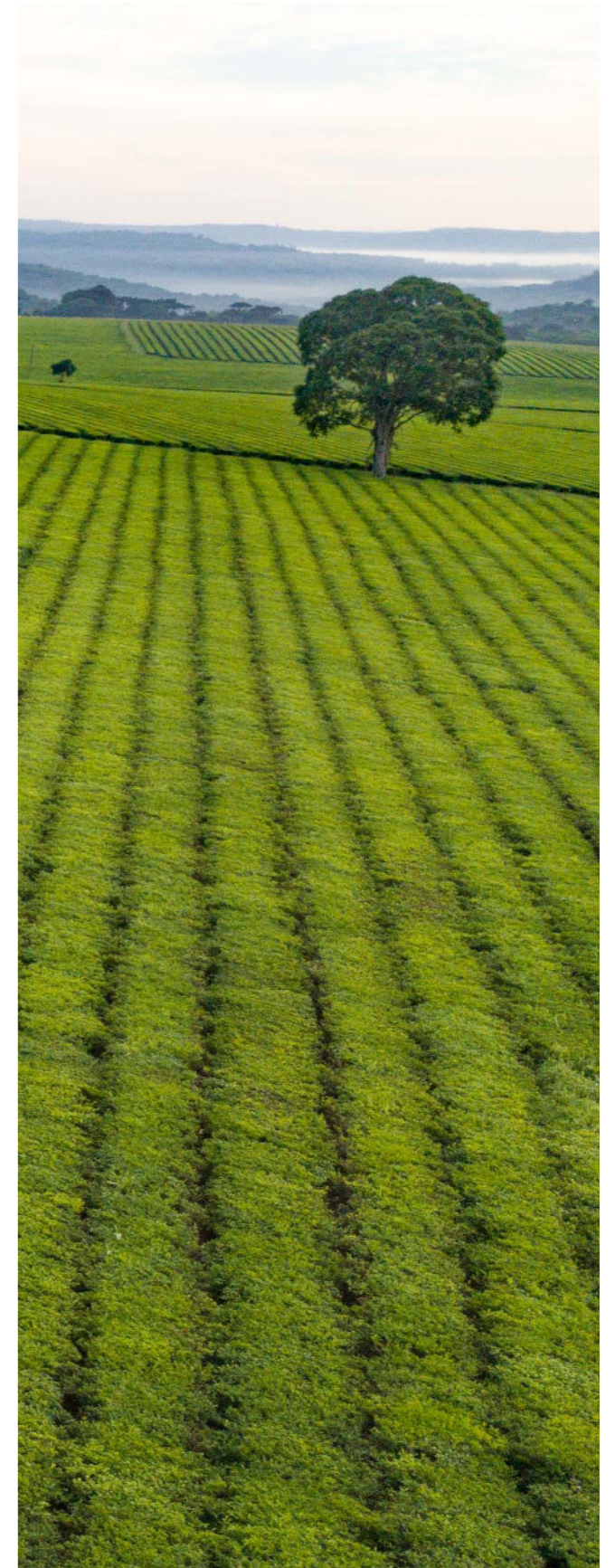
Wherever possible we will work with our customers to avoid purchasing practices that put undue pressure on suppliers that could result in adverse impacts.



6. STAKEHOLDER ENGAGEMENT AND COMMUNICATION

We encourage feedback and are keen to listen to our stakeholders' views. We engage with a wide range of stakeholders across our operations around the world. As part of our HRDD, we seek to engage in meaningful consultation with rightsholders to better understand the impacts we have on people's lives.

We disclose information to stakeholders in a variety of ways including via face-to-face meetings at a local level, and via our external reporting at a global level. Particular consideration is given to the ways in which we communicate and engage with vulnerable groups, and those for whom the regular engagement channels may not be accessible or appropriate.



7. REPORTING GRIEVANCES

We are committed to fostering a speak-up culture; providing accessible channels for grievances to be raised in confidence, without fear of retaliation.

All Business Units have grievance contact points at the local level. An independent confidential reporting service provided by [See Hear Speak Up](#) is also available to employees, contractors, suppliers, and wider rightsholders alike. Further information is detailed in the 'Speak Up' section of our Code of Conduct.

Everyone has a responsibility to respect human rights. Finlays employees are obliged to report, without undue delay, any actual or suspected breach of this Policy or human rights impact connected to our business. Other stakeholders are encouraged to do the same.





A handwritten signature in black ink that reads "J Woodrow".

James Woodrow
Group Managing Director

8. APPROVAL

This Policy has been approved by the Board of Directors and signed off by the Group Managing Director.



9. REVISION HISTORY

Editor	Version	Update date



THANK YOU FOR READING

If you have a question about our Human Rights Policy,
please reach out to your point of contact at Finlays, or email
Sustainability@Finlays.net

General Information

info@finlays.net

Swire House
59 Buckingham Gate
London
SW1E 6AJ
UK

Finlays
Since 1750

