

## Human Rights Policy

ProCook strives to adhere to the highest social and ethical standards, which includes respecting human rights and ensuring all individuals are treated with dignity and respect. This policy has been designed to set out our commitment to respecting human rights within our own operations and in our supply chain. We are obligated to conducting business in a responsible manner. We support internationally recognised principles aimed at protecting and promoting human rights, as described in the United Nations' Universal Declaration on Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. ProCook seeks to operate in compliance with all applicable laws for each country of business operations.

ProCook complies with national laws and regulations in the jurisdictions within which we operate. In the event of a conflict between international human right standards and national laws and regulations, ProCook will seek to implement processes to protect human rights.

While the primary responsibility for protecting and upholding human rights is with each country's government, we recognise our responsibility to respect human rights across our business and our supply chain. We aim to promote human rights and make a positive contribution, opposing human trafficking and the exploitation of children. This policy demonstrates our responsibility to respect human rights throughout our manufacturing and operations.

This policy applies to ProCook employees, suppliers, contractors and any other third party working with us.

### 1. Workplace Policies

At ProCook we are committed to offering a safe, respectful, and inclusive workplace. Our workplace policies include diversity, equality and inclusion, mental health and wellbeing and anti-bullying and harassment.

#### i. Diversity, Equity and Inclusion and non-discrimination

We celebrate diversity and are committed to fostering, cultivating, and maintaining a culture of equality, diversity, and inclusion. We have a duty of care to look after the health, safety and wellbeing of all colleagues offering an inclusive workplace with equal opportunities.

Colleagues and job applicants are treated fairly, with no discrimination regardless of age, disability, gender, gender reassignment, marital or civil partnership status, pregnancy or parental, race, colour, nationality, ethnic origin, religion or belief, sex, sexual orientation, or any other protected characteristic.

Our Diversity, Equality and Inclusion Policy states no unlawful discrimination in all aspects of employment with ProCook, including recruitment policies and practices, pay and benefits, terms, and conditions of employment, dealing with grievances and discipline, professional development and training, promotions, dismissal and redundancy, parental leave, flexible working and conduct at work.

ProCook do not tolerate any form of discrimination, bullying or harassment based on protected characteristics, we are committed to ensuring all employees are treated with dignity and respect.

#### ii. Health and Safety

Health and safety of our employees is paramount, we strive to provide a safe environment for all, including those attending our premises. All employees are trained appropriately for high standards of health and safety, as well as applicable extra training for their job role, for example following instructions for safe use of equipment. Colleagues must follow the correct process and are required to report any health and safety

concerns immediately. More information about employee health and safety can be found in our Health and Safety Statement and associated policies.

We promote the highest health and safety standards across our supply chain, seeking to ensure safe working conditions are achieved in all factories manufacturing our products.

## **2. Human Rights**

ProCook will not knowingly enter working relationships with suppliers that, directly or indirectly, pose health and safety risks, use children, modern slavery or forced labour, or other comparably exploitative practices.

We intend for our products to be made in safe, respectful workplaces and encourage our suppliers to ensure their factories adhere to all social regulations and laws. ProCook are a Sedex member and request all suppliers to be Sedex members (or equivalent) and to frequently undertake technical and ethical audits conducted by an accredited audit provider.

ProCook's terms and conditions set out requirements for the manufacture of our product with respect to labour standards and working conditions in the factories. These principles are intended to be consistent with the ILO Declaration on Fundamental Principles and Rights to Work. We ensure the suppliers we work with are adhering to high ethical standards by annual auditing. Non-compliances in human rights will be corrected before further business is conducted with this site.

Where there is a breach of this policy, suppliers will fall into the underperforming category. We will aim to support suppliers to make improvements, but if these are not rectified promptly, or there are human rights concerns, the supplier relationship may be terminated.

### **i. Human rights and natural resources**

The rights of local and indigenous communities with respect to land, water and natural resources must be respected by all ProCook suppliers.

ProCook will only source raw materials and products from suppliers that are committed to upholding the rights of local and indigenous communities, evidenced by thorough risk assessments and due diligence before engaging in new relationships.

Employees and workers in our supply chain must have easy physical access to clean, safe, and potable water and free sanitation services. Suppliers must ensure that their operations do not negatively impact the surrounding environment and access to local communities to clean water.

ProCook suppliers and their operations, both direct and indirect, must not negatively impact clean, healthy, and sustainable environment (UN Resolution 48/13)

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

### **i. Forced Labour**

ProCook opposes and prohibits any form of forced labour, including bonded labour, indentured labour, slave labour or human trafficking. Workers must be permitted to move around freely and leave their place of work when their working hours end.

ProCook will not tolerate the full-time recruitment and employment of young people that are below the minimum school leaving age in any country in which we are associated.

### **ii. Child Labour**

ProCook does not engage in bonded labor, child labor or forced labor. The minimum age for full-time employment must be 16 or the legal minimum age for employment under Applicable Law, whichever is higher. The Group must not hire employees under the age of 18 for positions that could be dangerous, hazardous to health or compromise the morals of the individual.

#### **4. Working rights and conditions**

##### **i. Treatment of workers and harassment**

ProCook opposes and prohibits physical abuse, verbal abuse, violence, threatening behaviour, sexual harassment, harassment, bullying and any other form of intimidation. This applies to all workers in our supply chain.

##### **ii. Wages, benefits and working hours**

ProCook colleagues are compensated fairly, we are committed to paying the Real Living Wage as a minimum to all UK employees. ProCook and associated suppliers must adhere to the stricter of applicable laws or industry standards relating to minimum wages, working hours, overtime, and benefits.

Workers must not regularly be required to work more than 60 hours per week, including overtime (or more than the limits on regular hours and overtime by local regulations and laws).

Wages for overtime must be paid in legal tender on a regular basis. Deductions from basic wages as a disciplinary measure is not permitted unless provided for by national law. Employees must be given reasonable breaks while working, sufficient rest periods between shifts and entitled at least one day off in seven.

All workers must be provided with written employment conditions, regarding their wages before entering employment. Working hours will be defined by contract, overtime may be offered but there is no obligation to work the overtime.

ProCook is committed to continued professional development of UK employees, providing learning opportunities and advancement of skills and capabilities. We expect our business partners and other relevant parties to do the same, and to recognise and respect human rights.

ProCook opposes and prohibits its supply chain partners from charging workers to secure work, including the payment of recruitment fees or associated costs as defined by the ILO. This is especially relevant for migrant workers.

##### **iii. Leave**

All ProCook employees are entitled to sick leave, annual holiday, and parental leave. Employees utilising this leave must not face dismissal or threat of dismissal, or any other discrimination as a result.

##### **iv. Employee contracts**

A written, understandable, and legally binding contract must be provided to all employees before starting work.

##### **v. Freedom of association and collective bargaining**

ProCook respects employee's rights to form or join a labour union, or other organisation of their choice, and to bargain collectively as permitted by national laws in support of their mutual interests without fear of penalising actions including harassment, intimidation, or termination of employment.

## **Grievances**

Workers and suppliers can raise grievances where they feel their human rights are or have been at risk of being violated without fear of retribution or reprisal. The grievance process must be inclusive for all, irrespective of age, disability, gender, gender reassignment, marital or civil partnership status, migration status, refugee status, pregnancy or parental, race, colour, nationality, ethnic origin, religion or belief, sex, sexual orientation, or any other protected characteristic.

We strongly encourage all parties to bring any violations or risks of human rights violations to our attention and report any concern to their line manager or our People department. Sensitive or confidential issues may also be reported to our whistleblowing helpline if necessary.

Suppliers are strongly encouraged to follow the ETI base code and local legislation and ensure a documented grievance policy is in place. This policy must include provisions ensuring that workers have the ability to safely raise sensitive gender-related grievances. Where women are restricted from joining trade unions or there are few or none female workers representatives, suppliers must guarantee women are treated fairly and their views and opinions are properly addressed.

## **Delivery, implementation, and policy review**

We are committed to being an ethically responsible business that respects human rights in all countries associated with our manufacture, operations, and sale of products.

- We manage our supplier auditing process through Sedex SMETA and BSCI Amfori audits
- We expect colleagues to foster an inclusive and safe workplace and adhere to employee conduct standards
- We will communicate this policy to ProCook colleagues and suppliers
- Employees can raise concerns regarding human rights violations through our HR team without fear of reprisal

This Human Rights policy will be regularly reviewed and updated at least annually, or as and when necessary, to reflect changes in legislation and ensure its continued adequacy and relevance.

**Approved by: Board of Directors**

**Date: 19 September 2023**