



DAVID
WOOD
foods

Human Rights and Anti Slavery Policy

1.0 Introduction

David Wood Baking Ltd is committed to the highest standards of business and ethical behaviour including compliance with all applicable laws and regulations, as well as company policies, practices and procedures. David Wood Baking Ltd respects internationally recognised Human Rights as established in the Universal Declaration on Human Rights and the International Labour Organisation's Core Conversations.

In line with the UN Guiding Principles on Business and Human Rights, David Wood Baking Ltd recognises the corporate responsibility to respect these principles and commit to 'know and show' this through on-going human rights due diligence. Furthermore, our efforts include ongoing robust engagement with our business and major supply chain partners to mitigate potential human rights impacts beyond our direct control.

Our support of internationally recognised Human Rights is consistent with our dedication to enriching our workplace, partnering with our supply chain, preserving the environment and supporting the communities where we operate.

2.0 Policy Objectives

The objective of David Wood Baking Ltd documented policies (as set out in the Company Rules Handbook and David Wood Baking Ltd Code of Conduct for Suppliers) is to provide an overview of expectations for employees and business partners.

In addition, the Human Rights Policy exists to:

- 2.1 Inform employees, business partners and customers of David Wood Baking Ltd commitment to human rights
- 2.2 Establish David Wood Baking Ltd commitment to 'know and show' its respect for human rights through on-going human rights due diligence
- 2.3 Maintain David Wood Baking Ltd high ethical standards
- 2.4 Contribute to the realisation of human rights globally

3.0 Policy Scope

David Wood Baking Ltd Human Rights Policy applies to all David Wood Baking Ltd employees, and anyone doing business for or with David Wood Baking Ltd and others acting on David Wood Baking Ltd behalf. This applies to all locations where David Wood Baking Ltd conducts business and to all company-sponsored events.

4.0 Definitions

Human Rights are basic rights inherent to all human beings, regardless of nationality, place of residence, sex, sexual orientation, national or ethnic origin, colour, religion, language or any other status.

5.0 Guidelines

David Wood Baking Ltd conducts its business in a manner that respects the rights and dignity of all people, complying with all applicable laws and regulations. Our policies reflect our commitment to respecting the production of internationally recognised Human Rights.

- 5.1 All employment with David Wood Baking Ltd is voluntary. We do not use child or forced labour in any of our operations or facilities. We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude. We fully respect all applicable laws establishing a minimum age for employment, in order to support the effective abolition of child labour worldwide.
- 5.2 David Wood Baking Ltd abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- 5.3 We respect our employees' right to choose to join or not join a trade union, or to have recognised employee representation in accordance with local law.
- 5.4 Diversity is embraced at David Wood Baking Ltd. We recognise that a diverse mix of backgrounds, skills and experiences drives new ideas, products, and services and provides us with a sustained competitive advantage.
- 5.5 We believe everyone should be treated with respect and dignity regardless of their background. We are committed to the elimination of discrimination based on gender, disability, race, class, economic status, ethnic background, sexual orientation, age, political beliefs, veteran status, marital status or any other protected class.

- 5.6 The Group Supply Chain Management System includes the requirement for all suppliers, vendors, contractors, consultants and agents to adhere to David Wood Baking Ltd Labour standards and Code of Conduct policies. All David Wood Baking Ltd Group businesses are members of SEDEX, the Supplier Ethical Data Exchange, to ensure supplier compliance with David Wood Baking Ltd Codes of Conduct and principles.

In addition to this, David Wood Baking Ltd is committed to the following principles:

- 5.7 David Wood Baking Ltd respects all Human Rights
- 5.8 David Wood Baking Ltd commits to conducting on-going human rights due diligence to assess and mitigate potential human rights infringements.
- 5.9 David Wood Baking Ltd expects those with whom it does business to respect all human rights.

6.0 Anti-Slavery and Human Trafficking Policy

- 6.1 Modern slavery is a crime resulting in abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.
- 6.2 Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they use forced labour. However, the company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant health and safety and human

rights laws and standards are being adhered to, including freedom of movement and communications

- 6.3 Regular training on this policy, and the risk that the business faces from modern slavery within its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.
- 6.4 The company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

7.0 Responsibility

The Human Rights policy is owned and maintained by David Wood Baking Ltd Human Resources function. Human Resources is responsible for the creation, administration, updating and communication of the policy.

8.0 Compliance

Employees and suppliers are expected to comply with this and all David Wood Baking Ltd policies. Violation of this policy or the refusal to cooperate will result in disciplinary action, up to and including termination and referral to the appropriate authorities, where we have sound reason to believe that our partner organisations infringe Human Rights we reserve the right to cease those relationships as warranted.

Specific to this policy, employees and suppliers are expected to:

- 8.1 Never infringe on human rights
- 8.2 Be alert to any evidence of human rights infringements in our direct operations or in the operations of our business partners and report any situation in which a human rights infringement is suspected.

David Wood



Managing Director

Date: June 2023