

Winterwood Farms Ltd provides a working environment which is free of any form of harassment or discrimination and protects their basic human rights.

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination. The company policy on human rights is guided by the [UN Guiding Principles on Business and Human Rights](#), [International Labour Organization's Declaration on Fundamental Principles and Rights to Work](#), [The Equality Act 2010](#). The company is committed to respecting all internationally recognised human rights as relevant to its operations.

Employment

Every person has a right to equal treatment with respect to employment without discrimination because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital status, family status, disability or the receipt of public assistance. The company will take account of the principals outlined in the Ethical initiative base code.

Harassment

Every person who is an employee has a right to freedom from harassment in the workplace by another employee, whatever their position, because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital status, family status, disability or the receipt of public assistance. Harassment means improper comment or conduct that a person knows or ought to know would be unwelcome, offensive, embarrassing or hurtful. Staff must not exert or attempt to exert undue or inappropriate influence on other staff or behave in a manner that may reasonably be perceived as intimidating or threatening. They must not influence outcomes with threats, bribes or inducements. Employees must NOT behave in an abusive way towards other staff, visitors to the site or to anyone off-site when they are representing the company. This includes initiating or spreading hurtful rumours, swearing at someone (includes obscene language, name calling, hand gestures), using insulting behaviour (includes both words and gestures), electronic or physical display of pornography, making physical threats, assaulting someone physically or sexually, creating unwanted sexual attention, making threatening gestures or remarks. All allegations of bullying and harassment will be taken seriously and managed consistently, with formal action taken where necessary.

Discrimination

Discrimination is any practice of behaviour, whether intentional or not, which has a negative effect on an individual or group based on prohibited grounds (for example, disability, gender, race, receipt of public assistance, sexual orientation) unrelated to the person's abilities or objective considerations relating to the decision that is to be made. Discrimination may arise as a result of direct or differential treatment or it may arise from the unequal treatment effect of treating individuals or groups in the same way. Staff must respect the dignity and rights of all other staff. Staff meetings must be held in locations that are accessible to staff, including any with disabilities and where facilities permit, with the provision of interpreters if necessary and possible.

Freedom of association and collective bargaining

The company respects its employees right to join, form or not join a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, the company is committed to establishing a constructive dialogue with their freely chosen representatives. The company is committed to bargaining in good faith with such representatives.

Health & safety

Employer has a duty of care to ensure that employees work in a safe environment, are treated with respect. The company provides a safe and healthy workplace and complies with applicable health and safety laws, regulations and internal requirements. The company is dedicated to maintaining a productive workplace by minimising the risk of accidents, injury and exposure health risks. The company is committed to engaging

with employees to continually improve health and safety in the workplace, including identification of hazards and remediation of health and safety issues.

Work hours, wages and benefits

The company compensates employees competitively relative to the industry and local labour market. The company operates in full compliance with applicable wage, work hours, overtime and benefit laws.

Forced labour, child labour and human trafficking

The company prohibits the use of all forms of child labour, [forced labour](#), including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of [human trafficking](#).

Accommodation

Where provided, every person has a right to equal treatment with respect to the occupancy of accommodation, without discrimination because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital status, family status, disability or the receipt of public assistance.

Harassment in accommodation

Every person who occupies accommodation has a right to freedom from harassment by the company or its agents or by an occupant of the same accommodation because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital status, family status, disability.

Our supply chain

The company expects its suppliers to adhere to the highest standards of quality and integrity in all aspects of their business.

The company 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. The company also requires all of the suppliers to become members of SEDEX, complete and maintain the self-assessment questionnaire (SAQ). All suppliers are also required to undertake a SMETA audit where required. All suppliers are required to complete a [Supplier Technical Undertaking](#) outlining these requirements.

The company carries out appropriate due diligence before working with a new supplier. All suppliers are being regularly visited and audited to monitor their compliance with required policies and ethical standards.

Salient issues

The company has carried out a risk assessment on potential [Salient Human Rights Issues](#) for the business. The company will continue to refine and explore these potential issues through further stakeholder input and any additional issues will be raised and actioned appropriately.

Remediation

The company encourages workforce and external stakeholders to report to the company on any Human Rights issues, without fear of reprisals towards the reporter.

The company places a high importance on providing effective investigation, resolution and remedy wherever allegations of a breach of human rights are made. The company has a [Remediation and Grievance Policy](#) specifically for remediation of human rights breaches in its operation and supply chain.