

# Valeo Foods Group - Human Rights Policy

## Introduction

Valeo Foods Group (and its subsidiaries) is committed to respecting human rights and treating people with dignity and respect. Our policy is grounded in the UN Guiding Principles on Business and Human Rights. The policy also includes specific commitments on fair labour practices, a grievance mechanism for reporting human rights violations, and annual reporting on our human rights performance, we strive to be a leader in responsible business practices.

Valeo Foods Group aims to conduct its business in a manner that respects the rights and dignity of all people, complying with all applicable laws and regulations. All employees of the group are entitled to basic rights regardless of their age, race, nationality, sex, sexual orientation, marital status, national or ethnic origin, colour, religion, disability, language or any other protected class which may exist under applicable law. Employees are expected to treat co-workers, customers and business partners with dignity and respect.

## Scope and Governance

In accordance with this commitment, Valeo Foods Group has adopted this Human Rights Policy which is applicable to all Valeo Foods Group Personnel, agents, representatives and other associated persons such as contract/ subcontract and third-party employees of Valeo Foods Group including all subsidiaries, associates, joint ventures and affiliated companies (collectively, the “Valeo Foods Group” or the “Group”).

This Policy and the internal controls described herein have been designed to ensure applicable Human Rights and associated requirements are understood, respected and adopted throughout the business. This Policy establishes standards for business conduct related to human rights and provides a cornerstone for Valeo Foods Group to identify and manage its human rights impacts and mitigate applicable risks.

This policy has been approved by Valeo Foods Group’s executive management and the Board of Directors. Any internal concerns or questions should be raised at a local level, in accordance with the relevant business procedure.

In addition, the policy is reviewed and monitored based on progress in strategic objectives and ongoing human rights priorities. The GCPO (Group Chief People Officer) has responsibility for the supervision and implementation of this policy. This policy is reviewed bi-annually and if any amendments are needed this will be actioned to comply fully with human rights reporting and governance requirements in the jurisdictions in which we operate.

While Valeo Foods Group is required to comply with applicable laws and regulations, this Policy goes beyond mere compliance with law. When differences arise between Valeo Foods Group standards (including this Policy) and legal requirements, the stricter standard shall apply, in compliance with applicable law.

## Our Commitment

Valeo Foods Group’s approach to human rights is anchored in the UN Guiding Principles on Business and Human Rights, which states that business enterprises should have policies and processes in place to meet their responsibility to respect human rights. This includes the following human rights commitments towards:

- **Diversity & Equal Opportunity (see also Valeo Foods Group DEI Policy):**  
Valeo Foods Group actively seeks out and hires qualified candidates from all backgrounds through targeted recruitment strategies and partnerships with diverse organizations. We strive to eliminate unconscious bias throughout the recruitment and promotion process to ensure a level playing field for all applicants.
- **Non-discrimination and anti-harassment:**  
Valeo Foods Group is committed to providing a work environment free from discrimination and harassment of any kind. This includes discrimination based on race, ethnicity, gender, sexual orientation, age, disability, religion, or any other protected characteristic. We have a zero-tolerance policy for harassment, and all employees are expected to treat each other with dignity and respect.
- **Workplace safety (see also Valeo Foods Group H&S Policy):**  
Valeo Foods Group is committed to providing a safe and healthy work environment for all employees. We believe that preventing accidents and injuries is essential, and we strive to continuously improve our safety practices. Foster a culture of safety where all workers including subcontractors feel protected from physiological and psychological hazards by proactively identifying and mitigating risks associated with dangerous equipment, unsafe work practices, and hazardous substances.
- **Fair wages, working hours and benefits:**  
Valeo Foods Group has collective agreements with unions to ensure that we provide a fair minimum wage to our employees. Furthermore, the Group is committed to ensuring the wellbeing of its workforce by complying with local norms on working hours and benefits.
- **Prevention of modern slavery (including forced labour, child labour and human trafficking):**  
Valeo Foods Group is committed to operating ethically and responsibly throughout our supply chain. We have zero tolerance for modern slavery, including forced labour and human trafficking and to ensure compliance we have internal processes and conduct regular audits.
- **Social dialogue:**  
Valeo Foods Group commits to promoting the engagement of the workforce, providing a framework for enduring relations at the group level, which include all forms of dialogue with

government, workers representatives on matters of shared interest. We are committed to freedom of association respects its workers' right to join or form unions without fear of retaliation, fostering a more open and collaborative work environment. This allows employees to have a collective voice in shaping workplace policies and advocating for their rights.

- Freedom of expression:

Valeo Foods Group is committed to freedom of expression would strive to create a safe space for employees to share ideas and concerns, even if those ideas challenge the status quo, while balancing this with the need to maintain a respectful and productive work environment.

- Environmental stewardship (See also Environmental policy):

Valeo Foods Group is committed to environmental stewardship prioritises minimising its impact on the planet through sustainable practices like efficient energy use and where possible using renewable resources, reducing water and waste while actively working to protect the environment through conservation efforts.

- External stakeholder human rights:

Valeo Foods Group commits to respect the human rights of external stakeholders, by assessing the impact of the company's operations on its social environment and on the related affected stakeholders.

Valeo Foods Group fosters openness and dialogue with our business and major supply chain partners to identify, prevent and mitigate potential human rights impacts. We are committed to working with our suppliers and external partners to uphold the principles of this Policy.

We track our commitments through anonymised data to meet our human rights objectives and progress is measured regularly against set targets.

## Specific Policy Points

### Supply Chains

Business Human Rights and the specific obligations of our suppliers as it relates to our supply chain are not addressed in this Policy. Refer to the Valeo Foods Group Supplier Code of Conduct for further guidance.

### Internal Reporting

Valeo Foods Group takes its commitment to Human Rights compliance very seriously. Any Valeo Foods Group personnel who have knowledge of, or reason to suspect, any violation of this Policy should follow local business reporting procedures or contact the Group Chief People Officer.

Alternatively, the independent whistle-blowing helpline can be called to maintain anonymity if it is not appropriate to report the matter internally. The whistle-blowing helpline is private and confidential and can be reached at any time of the day or night via [www.safecall.co.uk](http://www.safecall.co.uk). The hotline also contains local contact details and local language reporting options.

Valeo Foods Group will promptly investigate allegations and seek to pursue appropriate action to mitigate and remediate any adverse human rights impacts. Valeo Foods Group does not tolerate retaliation or threats of retaliation against anyone who in good faith reports possible violations of law, this Policy or other Valeo Foods Group policies or procedures, or participates in an internal investigation or governmental audit or investigation.

### **Compliance Procedures & Training**

Violation of this Policy or refusal to co-operate will result in disciplinary action up to and including termination of employment and, where applicable, referral to the appropriate authorities.

All personnel must adhere to this Policy, keeping in mind their personal responsibility to each other, customers, contractors, suppliers and visitors. They should also be aware of legal implications for their actions or lack thereof.

We take all allegations of human rights violations seriously. Any employee found to have violated this policy, through actions or omissions, will be subject to disciplinary action, up to and including termination of employment. This also applies to situations where an employee fails to report a suspected violation in good faith. We are committed to fostering a culture of respect and accountability, and a violation of this policy undermines these core values. Additionally, depending on the nature of the violation, legal action may also be pursued.

As part of Valeo Foods Group's ongoing commitment to Human Rights, all Valeo Foods Group personnel must receive, understand and agree to comply with this Policy.

Valeo Foods Group will provide periodic Human Rights training programs to educate personnel about human rights and the requirements and obligations associated with this Policy. All Valeo Foods Group personnel must participate in such training and local records must be kept as evidence establishing compliance with this requirement.

Any questions regarding this Policy can be addressed to the local divisional HR Lead or the Group Chief People Officer.

*Last Updated: June 2024*

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