

Our policy on:

Human Rights

Overview

We understand our customers and stakeholders want to feel confident that the people are employed by us are not subjected to abuse or exposed to violations of their human rights. Although it is the overall responsibility of national governments to uphold human rights, we fully acknowledge and welcome our responsibility as a company to uphold human rights in all of our operations. This policy is intended to protect Macfarlane Group PLC, our members, colleagues and business partners.

<p>Our Statement</p>	<p>Our Communities and Stakeholders</p>	<p>Key points</p> <ul style="list-style-type: none"> • Outlining our responsibilities, and of those working for and on our behalf, in seeing and upholding our position on human rights; and • Supply information to those working for and on our behalf on how to identify and report concerns about human rights.
<p>Our Commitments</p>	<p>Forced Labour</p>	
<p>Freedom of association</p>	<p>Your responsibilities</p>	

Other relevant policies and information

- Grievance Policy
- Diversity, Equality, and Inclusion Policy
- Whistleblowing Policy
- H&S Section on the Intranet
- Statement of Compliance – Slavery and Human Trafficking

1 Human Rights Policy

Policy Applicable: All Colleagues, including Agency, Contractors and Third-Party Representatives

Policy Owners: HR Director & ESG Committee

Last Updated: July 2024

Version: 2.0

Policy Status: This policy is non contractual, may be updated or changed by the company at any time.

Our Statement

We are committed to respecting everyone's human rights, ensuring that all individuals are treated with dignity and respect and will try to find and prevent adverse human rights impacts caused by our business activities. This policy outlines this commitment and the steps we take to meet our responsibility to respect internationally recognised human rights standards. It is guided by various international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

The Company adheres to national law and regulation in each market in which it operates. Where we face conflicts between internationally recognised human rights and national laws, the company will follow processes that seek ways to honour the principles of international human rights.

Our Communities and Stakeholder engagement

We recognise the impact on the communities in which we work and are committed to engaging with stakeholders in those communities to ensure that we consider their views as we conduct our business. Where right, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we work through locally relevant initiatives.

We expect our third-party suppliers and partners to adhere to the highest standards of quality and integrity in all aspects of their business.

We conduct appropriate due diligence before working with new suppliers and we monitor their compliance with our policies and ethical standards.

2 Human Rights Policy

Policy Applicable: All Colleagues, including Agency, Contractors and Third-Party Representatives

Policy Owners: HR Director & ESG Committee

Last Updated: July 2024

Version: 2.0

Policy Status: This policy is non contractual, may be updated or changed by the company at any time.

Our Commitments

Diversity, Equality and Inclusion

We value the diversity of our colleagues and make every effort to provide a working environment free from harassment and bullying and ensuring all colleagues are treated, and treat others, with dignity and respect.

Our Diversity, Equality and Inclusion Policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with the Company including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

Health, safety and hygiene in the workplace

The safety and health of our colleagues is of vital importance. We are committed to provide a safe and healthy workplace and follow applicable health and safety laws, regulations, and internal requirements.

Our Health and Safety Policies set out our approach to keeping a productive workplace by minimising the risk of accidents, injury and exposure to health risks.

Safety at Work

We are committed to keeping a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for colleagues are provided as needed and will be kept with respect for colleague's privacy and dignity.

Hours of work, Pay and Benefits

We work in full compliance with applicable wage, work hours, overtime and benefits laws and compensate colleagues competitively.

All colleagues will receive a contract of employment, detailing their statement of particulars before they enter employment with us.

Deductions from basic wages as a disciplinary measure is not allowed, without the express permission of the colleague concerned.

Hours of work are outlined within our contracts of employment. For certain roles within Macfarlane, overtime may be offered within a contract of employment but there is no obligation to work any overtime. Colleagues are given the choice of opting out of the Working Time 48 hours regulations, but this is a voluntary decision.

We are committed to using overtime responsibly, considering the extent and frequency of the hours worked by individuals and shall not be used to replace regular employment.

Obligations to colleagues under applicable apprenticeship levy schemes, are entered into with a full undertaking to carry these out.

Training

Training on this policy, and on the importance of adherence to human rights in our supply chains will be provided as necessary.

3 Human Rights Policy

Policy Applicable: All Colleagues, including Agency, Contractors and Third-Party Representatives

Policy Owners: HR Director & ESG Committee

Last Updated: July 2024

Version: 2.0

Policy Status: This policy is non contractual, may be updated or changed by the company at any time.

Forced labour and Human trafficking

We have an unwavering commitment to our social and environmental responsibilities and adopt a zero tolerance approach to slavery and human trafficking. We hold ourselves and our supply chain accountable and we follow the provisions of the Modern Slavery Act 2015. We recognise that modern slavery is a complex supply chain issue, and we work in partnership with our Customers, Suppliers and expert organisations to help develop long-term solutions to this issue.

We have policies in place regarding anti-slavery and anti-trafficking which influence decisions around suppliers, employees and workers on a day to day basis. These policies include but are not limited to:

- Recruitment Policy
- Employee Code of Conduct
- Whistle-blowing Policy
- Supplier Code of Conduct

We keep these policies under review, and we are members of SEDEX and are therefore able to use their expertise in this area.

Please refer to our Statement of Compliance – Slavery and Human Trafficking document available on our website.

Child labour

We will not employ any person considered by local or international law, conventions, or regulations to be a child in any role in any industrial or business operation under its control.

Colleagues under 18 years of age must not work at night or where hazardous work is needed. We have robust age verification checks when hiring people to ensure this policy is upheld, please engage with your Human Resource team if you are unclear of the rules around hiring a young person.

The minimum age for work should not be below the age for finishing compulsory schooling.

Freedom of association and collective bargaining

We respect the right of our colleagues to join or not to join a trade union without fear of reprisal, intimidation, or harassment. Where colleagues are represented by a legally recognised union, we are committed to

4 Human Rights Policy

Policy Applicable: All Colleagues, including Agency, Contractors and Third-Party Representatives

Policy Owners: HR Director & ESG Committee

Last Updated: July 2024

Version: 2.0

Policy Status: This policy is non contractual, may be updated or changed by the company at any time.

showing a constructive relationship with their freely chosen representatives and bargaining in good faith with such representatives.

Your responsibilities and how to raise a concern

- We expect all of those working for and on our behalf, read, understand, and follow this policy
- The prevention, detection, and reporting of human rights issues in any part of our business or supply chains is the responsibility of all those working for us or under our control and you must avoid any activity that might lead to, or suggest, a breach of this policy.
- You are encouraged to raise concerns about any issue or suspicion of human rights in any parts of our business or supply chains of any supplier tier at the earliest possible stage. You must notify David Mansfield, Managing Director and Helen Cashmore, HR Director as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.

David Mansfield	Managing Director (07840 714973	dmansfield@macfarlanepackaging.com
Helen Cashmore	HR Director	07710 320 661	hcashmore@macfarlanepackaging.com

- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains forms any violation of fundamental human rights, please raise it with Human Resources.
- We encourage colleagues to raise any issues that are concerning them. You won't be viewed unfavourably for doing this or being a witness for someone else who's complaining. We take it very seriously if anyone victimises a colleague for raising any issues under this Policy or being a witness and we may take disciplinary action against them.
- Given its importance, any breach of this policy may result in an investigation under the Company's Disciplinary and may result in disciplinary or (if you are not a colleague) other enforcement action being taken against you. Colleagues should refer to the Disciplinary policy for more information.

5 Human Rights Policy

Policy Applicable: All Colleagues, including Agency, Contractors and Third-Party Representatives

Policy Owners: HR Director & ESG Committee

Last Updated: July 2024

Version: 2.0

Policy Status: This policy is non contractual, may be updated or changed by the company at any time.