Verner Wheelock Associates Limited
Human Rights Policy
04 January 2021

At Verner Wheelock Associates Ltd we are committed to respecting everyone's Human Rights in all aspects of our operations and business. We support the principles set out in the following international standards:

- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- The International Labour Organisation's Fundamental Conventions

Scope

This Policy applies to all employees, directors, associates, auditors and contractors of Verner Wheelock Associates Ltd. It is expected that all suppliers will comply with the law on Human Rights as a minimum and are encouraged to do their utmost to comply with this Policy. Any breaches of this Policy by employees, directors, associates, auditors and contractors may result in an investigation in line with the Company's confidential Complaints Procedure and Disciplinary and Grievance Procedure.

Policy

We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights. Our aim is to help increase the enjoyment of human rights within the communities in which we operate. In our Company, it is every employee's responsibility to maintain a work environment that reflects respect for human rights and is free from all discrimination and harassment. If any employee believes that someone in our business or one of our contractors, suppliers or customers is a violating this Human Rights Policy and/or the law, they are asked to report it immediately to their manager or the Administration Controller or through the Whistleblower process.

We expect our suppliers and contractors to also have in place processes to enable their own staff to report any concerns

As a business, we have identified the following main areas of responsibility:

Equality and Diversity: Our commitment is to provide a safe and inclusive working environment where all people are treated fairly and with respect. We have a specific policy which sets out our commitment and the responsibilities of management and staff. We require our suppliers and contractors to comply with any local legislation which applies to equality and diversity as well as adhering to our behaviours and values, supporting us in the delivery of our commitment.

Freedom of Association and Collective Bargaining: We respect the right of our employees to join or not to join a trade union and as such they are free to join an organisation of their choice to represent them in line with local legislation. Collective Bargaining is allowed.

Labour rights: We provide fair working conditions for our employees including terms and conditions of employment, remuneration, working hours, resting time, holiday entitlements, maternity/paternity leave and benefits; we comply with all applicable legislation. We have specific policies which set out our commitment and the responsibilities of management and staff. We expect all suppliers and contractors to comply with all applicable local legislation as well as adhering to our behaviours and values, supporting us in the delivery of our commitment.

Wages: Verner Wheelock Associates Ltd is committed to ensuring that their direct employees are not paid lower that that required by law. We require our suppliers to comply with all applicable legislation with regards to wages.

Forced Labour (Slavery): Verner Wheelock Associates Ltd has a policy of zero-tolerance towards acts of modern slavery which are unlawful and are a violation of fundamental human rights. We have a specific Modern Slavery and Human Trafficking statement which sets out our commitment and the responsibilities of management and staff. We require our suppliers and contractors to comply with all applicable local legislation as well as adhering to our behaviours and values, supporting us in the delivery of our commitment.

Safe and Healthy Workplace: We are committed to delivering high standards of health and safety management and aim to continually improve our performance, always seeking to reduce risk. We believe in always doing the right thing and in doing it safely, without unnecessary risk to people's health and will comply with all relevant legislation. We have a specific policy which sets out our commitment and the responsibilities of management and staff. We require our suppliers and contractors to comply with all applicable legislation as well as adhering to our behaviours and values, supporting us in the delivery of our commitment.

Child Labour: Our Company primarily operates in the UK and complies with all relevant legislation regarding this; we will not employ young persons under the age of 18 in a hazardous role or at night. We do not tolerate the use of child labour and require that our suppliers do not to use children in their operations, including in their own supplier base.

Any concerns regarding Human Rights issues in our organisation can be reported through our confidential complaints procedure which can be found on our website.
We have a Whistleblowing line for use by all staff and associates.
There is a link entitled **Whistleblowers Reporting** on our website at https://www.vwa.co.uk/food-industry-resources.html.

This policy has been approved & authorised by:

Name:	Alison Wheelock
Position:	Managing Director
Date:	10 February 2023
Signature:	