



Human Rights Policy

Hovis is a well-known household brand having over 130 years in the baking and milling industry. We are proud of our heritage and our reputation and are committed to putting Hovis goodness at the heart of every day. We recognise that, to achieve this, we must adhere to the highest possible standards in everything we do, including respecting human rights and ensuring that all individuals are treated with dignity and respect.

This policy sets out our commitment and the steps we take to meet our responsibility to respect internationally recognised human rights standards. It is guided by the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Hovis complies with national laws and regulations in the jurisdictions within which it operates. In the event of a conflict between national laws and regulations and international human rights standards, Hovis will always seek to implement processes that respect those international human rights standards.

This policy provides the basis for embedding responsibility to respect human rights throughout all of our business functions and applies not only to Hovis, but also to its parent and subsidiary companies, employees, contractors, suppliers, agents and any other third party working with us as part of our operations.

This policy is approved and overseen by the Hovis Executive Team. This policy will be reviewed on an annual basis to ensure compliance, with the HR Director maintaining overall responsibility.

Our Supply Chain

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

Hovis 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, and we require all of our ingredients and packaging suppliers to become members of SEDEX. We also require our suppliers to comply with our Ethical Trading Policy.

Furthermore, we carry out appropriate due diligence before working with a new supplier and we audit our suppliers to monitor their compliance with our policies and ethical standards.

Diversity, Inclusion and Equal Opportunities

1. Hovis values diversity and is committed to promoting equal opportunities in the workplace. Every job applicant, employee or worker will be treated fairly and equally with dignity and respect regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, social class, nationality, ethnic or national origin, religious belief, union membership, political opinion, sex, sexual orientation or any other protected characteristic.
2. Hovis' Equal Opportunities Policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with Hovis, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures and termination of employment.
3. At Hovis we believe that people have a right to be treated with dignity. Hovis is committed to providing a working environment free from harassment and bullying and ensuring all employees are treated, and treat others, with dignity and respect.

Health, Safety and Hygiene in the Workplace

1. We are committed to ensuring the highest standards for health and safety of employees and anyone affected by our business activities, and to providing a safe and suitable environment for employees and all those attending our premises.
2. Our Health and Safety Policy sets out our arrangements in relation to:
 - a. assessment and control of health and safety risks arising from work activities;
 - b. preventing accidents and work-related ill health;
 - c. consultation with employees on matters affecting their health and safety;
 - d. provision and maintenance of a safe workplace and equipment;
 - e. information, instruction, training and supervision in safe working methods and procedures;
 - f. emergency procedures in cases of fire or other major incident.
3. All employees share the responsibility of achieving safe working conditions and we are committed to engaging with employees to continually review and improve health and safety in our workplaces. Employees are provided with appropriate training and required to take care of their own health and safety and that of others, observe applicable safety rules and follow instructions for the safe use of equipment. Employees are also required to report any health and safety concerns immediately and to co-operate on health and safety matters, including the investigation of any incident.

Forced Labour, Human Trafficking and Child Labour

1. Hovis is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. There is no forced, bonded or involuntary prison labour used in any part of Hovis. Employees and workers are not required to lodge "deposits" or their identity papers and are free to leave their employment after reasonable notice is given in accordance with their contract. Identity papers may be checked to ensure we comply with our legal obligation to ensure individuals have the right to work in the UK but these are always returned.
2. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
3. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.
4. Hovis does not employ anyone under the age of 18 years of age (unless employed as part of an apprenticeship scheme where the minimum age will be 16 years of age) and there are robust processes and systems in place to ensure this is the case. Should a child be found to be working within one of our facilities or in our supply chain, Hovis pledges to work closely with the facility or partners, in accordance with local laws and the guidance of the ETI base code/ILO standards, in order to remedy the situation to ensure no harm is caused.

Hovis prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required, and for any employment at night.

Treatment of Workers

1. Physical abuse, the threat of physical abuse, verbal abuse, violence, sexual or other harassment, bullying or other forms of intimidation are prohibited.

Wages, Benefits and Working Hours

1. We compensate employees competitively relative to the industry and local labour market. We

ensure full compliance with applicable wage, work hours, overtime and benefits laws (including but not limited to the laws applicable to the national minimum and living wage). In any event, wages should always be enough to meet the basic needs and provide some discretionary income.

2. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the period concerned each time that they are paid.
3. Deductions from basic wages as a disciplinary measure is not permitted; nor are any deductions from wages not provided for by national law, without the express permission of the worker concerned.
4. Working hours will be defined by contract. Workers may be offered overtime hours from time to time, but there is no obligation to work any overtime, unless covered by local collective bargaining agreements. Workers are given the option of opting out of the Working Time 48 hour regulations, but this is a voluntary decision. Overtime shall be used responsibly, taking into account the extent and frequency of the hours worked by individual workers and the workforce as a whole. Appropriate safeguards are always taken to protect the worker's health and safety. Overtime shall not be used to replace regular employment and shall always be compensated for appropriately.
5. Employment relationships are based on established national laws and practises. Obligations to employees under applicable social security regulations, and apprentices' schemes, are entered into with a full undertaking to carry these out. Excessive use of fixed-term contracts for the purposes of avoiding employee rights and benefits is not permitted.

Freedom of Association and Collective Bargaining

1. We recognise our employee's rights to join or form trade unions, and to bargain collectively as permitted by national laws. These rights will not be restricted or interfered with.
2. Hovis adopts an open attitude towards the activities of trade unions and their organisational activities. Workers representatives are not discriminated against and have the ability to carry out their representative functions in the workplace.
3. Where the right to freedom of association and collective bargaining is restricted by law, we will facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

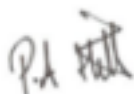
Communication and Review

1. Hovis undertakes to ensure that its Human Rights Policy and those policies which derive from

it are communicated effectively to all employees, contractors, suppliers, agents and any other third party working with us as part of our operations.

2. Hovis strives to create an open and honest working environment in which everyone's views are valued and respected. All employees are able to raise any concerns they have regarding any human rights violations through our confidential internal helpline with complete anonymity and without fear of reprisal. Any customer with concerns regarding Hovis' activities and compliance with our Human Rights Policy or legal obligations can raise these through our customer service channels that can be found on our website. This policy shall be reviewed and updated as and when necessary, to reflect changes in relevant legislation and improvements in approach.

Authorised Signatory:

A handwritten signature in black ink, appearing to read 'P.A. Hill', is positioned above the printed name.

Pete Hill

HR Director