



IRISH CONTINENTAL GROUP

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1.0 INTRODUCTION

Irish Continental Group (ICG) is committed to the highest standards of business and ethical behaviour including compliance with all applicable laws and regulations, as well as company policies, practices and procedures. ICG respects internationally recognised Human Rights as established in the Universal Declaration on Human Rights and the International Labour Organisation's Core Conventions. In line with the UN Guiding Principles on Business and Human Rights, ICG recognises the corporate responsibility to respect these principles and commit to 'know and show' this through on-going human rights due diligence. Furthermore, our efforts include ongoing robust engagement with our business and major supply chain partners to mitigate potential human rights impacts beyond our direct control. Our support of internationally recognised Human Rights is consistent with our dedication to enriching our workplace, partnering with our supply chain, preserving the environment and supporting the communities where we operate.

2.0 SCOPE

This policy applies to all employees of Irish Continental Group and its subsidiaries, third party contractors, agents or consultants representing or acting on behalf of ICG.

3.0 POLICY PURPOSE

The purpose of ICG's documented policies e.g. Anti-Bribery policy, Modern Slavery policy and Equality, Diversity and Inclusion policy, Dignity and Respect in the Workplace policy, is to provide an overview of expectations for employees and business partners. In addition to these policies the Human Rights Policy Purpose is to:

- Inform employees, business partners and customers of ICG's commitment to human rights.
- Establish ICG's commitment to 'know and show' its respect for human rights through on-going human rights due diligence.
- Maintain ICG's high ethical standards.
- Contribute to the realisation of human rights globally.

4.0 DEFINITIONS

Human rights are basic rights inherent to all human beings, regardless of nationality, place of residence, gender, sexual orientation, national or ethnic origin, colour, religion, language, or any other status as detailed in the Equality Act 1998- 2015 Ireland, Equality Act 2010 UK, The Equal Treatment Act The Netherlands.

5.0 GUIDELINES

ICG conducts its business in a manner that respects the rights and dignity of all people, complying with all applicable laws and regulations. Our policies reflect our commitment to respecting the protection of internationally recognised Human Rights.

- All employment with ICG is voluntary. We do not use child or forced labour in any of our operations or facilities. We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude. We fully respect all applicable laws establishing a minimum age for employment, in order to support the effective abolition of child labour worldwide.
- ICG abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- We respect our employees' right to choose to join or not join a trade union, or to have recognised employee representation in accordance with local law.
- Diversity is embraced at ICG as per our Equality, Diversity and Inclusion Policy. We recognise that a diverse mix of backgrounds, skills and experiences drives new ideas, products, and services and provides us with a sustained competitive advantage.
- We believe everyone should be treated with respect regardless of their background as per our Dignity and Respect at Work Policy. We are committed to the elimination of discrimination based on gender, race, class, economic status, ethnic background, sexual orientation, age, political beliefs, civil status or any other protected class.
- The Health, Safety and Wellbeing of our employees is of paramount importance. It is our policy to provide a safe and healthy workplace and comply with applicable health and safety laws and regulations. We strive to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.
- ICG commits to conducting on-going human rights due diligence to assess and mitigate potential human rights infringements.
- ICG expects those with whom it does business to respect all human rights.

6.0 RESPONSIBILITY

The Human Rights policy is owned and maintained by the Human Resources function. Human Resources is responsible for the creation, administration, updating and communication of the policy.

7.0 COMPLIANCE

Employees and suppliers are expected to comply with this Human Rights Policy and all documented ICG policies concerning human rights issues noted in Part 3.0 of this policy. Violation of these policies or the refusal to cooperate will result in disciplinary

action, up to and including termination and referral to the appropriate authorities, where we have sound reason to believe that our partner organisations infringe Human Rights, we reserve the right to cease those relationships as warranted. Specific to this policy, employees and suppliers are expected to:

- Never infringe on human rights.
- Be alert to any evidence of human rights infringements in our direct operations or in the operations of our business partners and report any situation in which a human rights infringement is suspected.

8.0 POLICY AMENDMENTS

ICG may amend or change this policy from time to time to reflect legislation and to ensure best practice.

Should you have further queries, or require clarification on any aspect of this policy, please contact the HR department.