

HUMAN RIGHTS AND MODERN SLAVERY POLICY

The Brewery is committed to upholding the highest standards of ethical conduct, respecting and promoting human rights in all aspects of our operations. We recognise the importance of promoting and protecting human rights in our operations, both within our organisation and across our supply chains. This policy outlines our commitment to preventing modern slavery and human trafficking in any form, ensuring the protection of workers' rights, and supporting the well-being of all individuals involved with our company.

This policy is aligned with the principles set forth in the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. We recognize and respect all internationally proclaimed human rights as outlined in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

PURPOSE

The purpose of this policy is to outline our commitment to:

- Upholding human rights in accordance with international standards.
- Preventing and eradicating modern slavery, human trafficking, and forced labour.
- Ensuring that our supply chains and business operations are free from human rights abuses.
- Fostering a culture of respect for human rights in our business and in the communities where we operate.

SCOPE

Our Human Rights and Modern Slavery Policy applies to all employees, contractors, suppliers, and partners. We expect all our stakeholders to adhere to this policy.



PRINCIPLES

We will:

- Seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they occur, in a timely and appropriate manner.
- Seek to prevent or mitigate our adverse human rights impacts that are directly related to our operations, products and services through our business relationships.
- Provide for or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts.
- Continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

POLICY STATEMENT

This sets out our position with respect to human rights and modern slavery and sits alongside our HR Staff Handbook and Health and Safety Policy.

CHILD LABOUR

The Brewery will not use child labour and will comply with all relevant laws in this regard. We do, however, support legitimate workplace internships, apprenticeships, and other similar programmes that comply with the applicable laws and regulations. Workers under the age of 18 will not perform work that is likely to jeopardise their health or safety, including night shifts and overtime.

MODERN SLAVERY

The Brewery will not use forced, bonded or involuntary labour, and workers are not required to deposit identity papers with the company and can leave after giving reasonable notice, with all wages owed to be paid. We have a zero-tolerance approach towards human trafficking.

HEALTH AND SAFETY

The Brewery will provide a safe and healthy working environment for all employees and contractors. We will ensure that our operations do not adversely impact the health and safety of the communities in which we operate.



NON-DISCRIMINATION AND EQUAL OPPORTUNITY

The Brewery will provide a workplace free from discrimination and harassment, ensuring equal opportunity for all employees regardless of race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. The Brewery is fully committed to eliminating discrimination in recruitment, training and working conditions. We have Equality & Diversity, and Anti-Harassment and Bullying Policies in place.

WORKING HOURS

The Brewery will ensure that working hours are reasonable and comply with the law and industry standards.

FAIR LABOUR PRACTICES

The Brewery will uphold the freedom of association and will eliminate all forms of forced and compulsory labour, child labour, and discrimination in respect of employment and occupation.

COMMUNITY ENGAGEMENT AND DEVELOPMENT

The Brewery will engage with local communities to understand and address their concerns.

ENVIRONMENTAL RESPONSIBILITY

The Brewery will recognise the interconnection between human rights and environmental sustainability and strive to minimise our environmental footprint and promote sustainable practices in all our operations. We will integrate this policy into our business processes and decision-making. Our commitment to human rights is reflected within our Sustainable Development and Sustainable Procurement policies.

EMPLOYMENT TERMS

The Brewery will provide written and clear contracts which detail the terms and conditions of its staff employment. We will ensure that the work performed by the employees is on the basis of recognised employment law and practice.



REMUNERATION

The Brewery will, at a minimum, provide wages and benefits that meet national standards. We will provide employees with clear written information on their pay and conditions.

TRAINING

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, and updates will be provided using established methods of communication such as our online training platform Cademi.

THE BREWERY WILL PROVIDE

- Training on human rights issues, modern slavery, and the company's policy to prevent exploitation (<https://brewery.cademi-hlp.io/learning/course/2521>)
- Educational resources on how to recognise signs of modern slavery and how to report concerns.
- Ongoing support and guidance to ensure compliance with this policy.

The organisation will regularly monitor and report on our human rights performance and take corrective actions, as necessary.

GRIEVANCE AND REMEDIATION (OVG GRIEVANCE PROCEDURE AND WHISTLEBLOWING POLICY)

The Brewery is committed to providing accessible and effective grievance mechanisms for individuals and communities affected by our operations.

Where a human rights violation is identified, we will work with all parties involved to seek access to remedy, compensation, and justice for the victim.

We will also investigate the root cause so that we can take appropriate steps to prevent such a violation reoccurring.

We are committed to addressing and resolving any human rights issues promptly and transparently.



We encourage all employees, contractors, and business partners to report any suspected incidents of modern slavery, human trafficking, or human rights violations. Reports can be made through the following channels:

- Internal Reporting: Employees should report concerns directly to their line manager or HR Department.
- External Reporting: Reports can also be made anonymously to a legal advisor, a prescribed person or body, for example, an auditor or regulator, or any other person or body, for example, Police or media. (more details are provided in the Whistleblowing Policy).

Reports will be investigated promptly and confidentially. Any individual found to have violated this policy will face disciplinary action, including potential termination of employment or contracts, and may be reported to the appropriate authorities.

IMPLEMENTATION AND REVIEW

The Brewery CEO has responsibility for leading the Human Rights and Modern Slavery Policy throughout the company, management of human rights issues, monitoring and reviewing the human rights implementation and reporting regularly to top management. This policy will be reviewed annually and updated as necessary to reflect our ongoing commitment to human rights.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Approved by

James Varah
Chief Executive Officer
July 2026

