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	Issue Date: 17/12/2018	Revised:	Issue 1

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Human Rights Policy

Respect for human rights is fundamental to the sustainability of Newberry International Produce and the communities in which we operate. In our Company and across our system, we are committed to ensuring that people are treated with dignity and respect.

The Newberry International Human Rights Policy is guided by 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 Human Rights Policy applies to Newberry International Produce, the entities that it owns, the entities in which it holds a majority interest, and the facilities that it manages.

Respect for Human Rights

Newberry International Produce respects human rights. It is committed to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by our business activities before or if they occur through human rights due diligence and mitigation processes.

Community and Stakeholder Engagement

The Company recognises its impact on the communities in which it operates. We are committed to engaging with stakeholders in those communities to ensure that we are listening to, learning from and taking into account their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. We believe that local issues are most appropriately addressed at the local level.

Valuing Diversity

The Company values the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equal opportunity and intolerance of discrimination and harassment. We are dedicated to maintaining workplaces that are free from discrimination or harassment on the basis of race, sex, colour, national or social origin, religion, age, disability, sexual orientation, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, training, compensation and advancement at the Company is qualifications, performance, skills and experience.

Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace. These principles apply not only to Company employees but also to the business partners with whom we work.

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Freedom of Association and Collective Bargaining

The Company respects our employees' right to join, form or not to join a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

Safe and Healthy Workplace

The Company provides a safe and healthy workplace and complies with applicable safety and health laws, regulations and internal requirements. We are dedicated to maintaining a productive workplace by minimizing the risk of accidents, injury and exposure to health risks. We are committed to engaging with our employees to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.

Workplace Security

The Company is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity.

Forced Labour and Human Trafficking

Newberry International Produce prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking.

Child Labour

The Company prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

Work Hours, Wages and Benefits

The Company compensates employees competitively relative to the industry and local labour market. We operate in full compliance with applicable wage, work hours, overtime and benefits laws.

Guidance and Reporting for Employees

Newberry International Produce creates workplaces in which open and honest communications among all employees are valued and respected. The Company is committed to following all applicable labour and employment laws wherever we operate.

If you believe that a conflict arises between the language of the policy and the laws, customs and practices of the place where you work, if you have questions about this policy or if you would like to report a potential violation of this policy, you should raise those questions and concerns through existing processes, which make every effort to maintain confidentiality.

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You may ask questions or report potential violations to your line management or in house HR representative. Employees can also report suspected violations through the whistleblowing box which can be found in the kitchen.

No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company is committed to investigating, addressing and responding to the concerns of employees and to taking appropriate corrective action in response to any violation.

If any employee or stakeholder believes that someone is violating the Human Rights Policy or the law, they are asked to report it immediately to their manager, utilise the Confidential Reporting System which can be found in the Staff Canteen, or email relevant details using this link on our website where all details of the report and the sender's identity will remain confidential. Clicking the link will create an email addressed to the individual at Newberry who is responsible for measuring our direct, indirect and potential impacts on stakeholders.

Gillian Pearson
Managing Director
17/12/2018