

TFG London Human Rights Policy

Our Commitment

TFG Brands London is committed to respecting, protecting, and advocating for the human rights of all who are involved in our own business operations and supply chains. We accept our responsibility to act with transparency and integrity, to be proactive in resolving problems and to collaborate with others to ensure that international human rights are respected, and that wherever we operate, people are treated with dignity and respect.

Our business strategy is centred around internationally recognised human rights and labour standards frameworks. By implementing the UN Guiding Principles on Business and Human rights, we are also committed to ensuring that all rights holders in our supply chain and operations have full access to their human rights at work.

This policy outlines the steps taken to embed this commitment, and its overarching principles, into the policies and procedures throughout our business operations.

Our Policy

The TFG Brands London Human Rights Policy is guided by international human rights principles incorporated in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and The UK Modern Slavery Act), the UN Convention on the Rights of the Child, Children's Rights and Business Principles, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

We place specific attention on salient and developing risks by applying our due diligence to avoid infringing on the rights of others and addressing the adverse impacts of our global operations.

Our teams across the business are encouraged to work collaboratively, cross functionally and with our supply chain and operations partners to uphold this commitment, and to continue to contribute fully in pursuit of this goal by following these four key principles:

1. Clear Expectations
Before establishing a relationship, we set out our commitment to ethical trade, as well as the requirements our partners must meet to support this aim. As our journey towards responsible purchasing practices evolves, we are committed to collaborating with our partners, to ensuring that our actions enable them to meet our requirements and expectations and to achieving mutual business success, with the medium-term aim of raising standards and improving working conditions as our relationship develops.
2. Support and Guidance
We provide support and guidance to our partners to help them understand and meet our requirements. This includes putting in place the policies and procedures to ensure our business operations and supply chains are equipped to protect and respect human rights and labour standards, as well as being environmentally responsible.
3. Open Communication
We are committed to continually evolving and improving our ways of working, to ensuring our relationships are based on open and honest dialogue and to gaining feedback so we can reflect and adjust our own standards and behaviours where needed.
4. Due Diligence
Underpinned by the UN Guiding Principles for Business and Human Rights and aided by the ETI Human Rights Due Diligence (HRDD) framework, we assess, identify, monitor, and mitigate all

direct and indirect human rights risks, which helps us to better understand, manage and respond to the risks in our business operations and supply chains. Through this due diligence process - which in some cases will be enhanced - we carry out a risk assessment across our manufacturers and non-stock suppliers, as well as collaborating with our strategic partners to gain external expert guidance and advice.

A wide range of individuals and organisations are engaged in the global effort to advance human rights. Recognising the increasingly difficult environment in which they operate, we do not tolerate abuse, threats, intimidation, physical or legal attacks or reprisals against environmental and human rights defenders. We support the recommendation of the [UN Special Rapporteur on the Situation of Human Rights Defenders](#) that both states and businesses should actively support and promote the role of human rights defenders working in their sectors, and to speak out when human rights defenders are targeted by reason of their carrying out vital work.

We will continue to build and use our leverage where possible, and collaborate with other companies, civil society, worker representatives, trade unions and trade associations as well as governments and other stakeholders so that we continue to address the root causes of human rights issues and are able to influence systemic and lasting change.

Remedy

We recognise the importance of access to effective grievance mechanisms and are committed to increasing our capability to effectively identify and respond to concerns. We strongly support dialogue and open communication channels and encourage individuals to raise any concerns with us directly. We also recognise that state-based judicial or nonjudicial mechanisms for those who feel human rights have been impacted is an important pathway for raising human rights grievances. We will not impede access to these established mechanisms, and we aim to co-operate as required with competent authorities in investigating or adjudicating where it is alleged that human rights have been impacted. We require the provision of transparent, fair and confidential grievance mechanisms by our suppliers for workers, and where necessary we will support them to establish these, and we commit to providing remedy where we have directly caused or contributed to an impact.

Equity, Diversity and Inclusion

We continue to work with our entire business towards the transformations in society that will tackle social inequality and unfairness and end the marginalisation of individuals and groups who are under-represented. We have identified four focus areas for our Equity, Diversity, and Inclusion strategy: gender, race and ethnicity, neurodiversity, and people with disabilities, and LGBTQI+ communities – both in our own operations and working with our business partners and other stakeholders. Around the world many women, widely represented in all these marginalised groups, face discrimination and disadvantage, lack access to skills and training, and face roadblocks to their active participation in the economy. They often lack the protection of basic rights and laws. Poverty, discrimination, and violence against women are major barriers to opportunity.

The economic empowerment of women and girls is a critical and highly impactful catalyst to unlock progress in human development and economic growth. To be a truly inclusive business, we need to make sure women, especially women from underrepresented groups, have the same access as men to opportunities, and the same capacity, confidence, and freedom to take up those opportunities and the skills and confidence to fulfil their potential within them.

Our Governance

Upholding our commitment to respect and advocate for the human rights of everyone involved in our operations and supply chain remains a key strategic priority for TFG Brands London. Led from the top, our governance structure is overseen by our CEO and supported by the Operational Board, which brings together the most senior leaders in our business, with a wide range of expertise, to oversee responsible business practice.

As well as providing strategic direction, the Operational Board is consulted on human rights issues when the severity of an actual or potential impact is high, where a business-critical decision needs to be taken,

or where financial investment may be needed to address an impact. We work together to respond to our salient human rights issues including capacity building and remediation where needed.

We work both bilaterally and more widely to prevent their re-occurrence while engaging internally and externally to help identify emerging human rights risks.

Role	Responsibility
CEO and Operational Board	<ul style="list-style-type: none"> - Uphold and oversee the TFGL Human Rights Policy. - [Create a sustainable framework] - Take appropriate action on areas of concern.
CSR & Sustainability Committee	<ul style="list-style-type: none"> - Review and assess human rights risks. - Escalate and take appropriate action on areas of concern. - Review this Policy on an annual basis and update where necessary.
All Teams	<ul style="list-style-type: none"> - Implement and uphold this Policy. - Communicate this Policy to all relevant stakeholders.

Going Forward

We continually evaluate and review how best to strengthen our approach to addressing human rights, including labour rights. We believe that continuing to work through external initiatives and partnerships (with other industries, civil society, trade unions, NGOs, suppliers and other business partners) is often the best way to address shared challenges.

We increasingly see the impact on human rights resulting from environmental and climate change and understand that we can only resolve these global challenges by addressing them together. While continuing to work to identify, reduce and avoid these impacts, we also recognise that some mitigation measures taken to reduce environmental impacts may adversely affect people’s human rights. We aim to address this by taking a human rights lens to our environmental commitments. The principles of this Policy continue to be implemented across our operations and supply chain. Leveraging the power of our purposeful brands to create a positive social impact is a core part of TFG Brands London’s values, the foundation of which is the respect for human rights.

We commit to reviewing this policy on an annual basis.

Justin Hampshire,
TFG Brands Chief Executive Officer

Approved by the TFGL Operational Board on xx/xx/xx