

# Human Rights Policy Statement

## Overview

Tower Cold Chain is committed to respecting everyone's human rights in all aspects of our operations. We believe that we have a responsibility to ensure that human rights are understood and observed in the areas that we operate in.

We support the principles set out in the following international standards:

- ❖ UN Declaration of Human Rights
- ❖ UN Guiding Principles on Business and Human Rights
- ❖ The International Labour Organization's Fundamental Conventions

## Scope

This policy applies to all personnel of Tower Cold Chain, including all directors, employees and contractors. It is expected that all Tower suppliers, comply with the law as a minimum and should do their utmost to comply with the principles of this policy.

## Policy

At Tower Cold Chain, it is every employee's responsibility to maintain a work environment that reflects respect for human rights and is free from all discrimination and harassment.

If any employee believes that someone, either in Tower Cold Chain or one of our suppliers or a contractor is violating this Human Rights Policy and/or the law, they are asked to report it immediately to HR, their line manager or a member of the Senior Leadership team, or through the Whistle-blower process. We expect our suppliers and contractors to also have in place processes to enable their own staff to report any concerns.

It is the responsibility of Tower Cold Chain to ensure that suppliers have access to a copy of this policy and that confirmation in writing from the supplier that the requirements and expected behaviours laid out in this policy will be met is recorded.

We have identified the following main areas of responsibility:

**Equality and Diversity:** Our commitment is to provide a safe and inclusive working environment where all people are treated fairly and with respect.

**Labour rights:** We provide fair working conditions for our employees including terms and conditions of employment; we comply with all applicable legislation for all Tower employees and contractors.

**Wages:** Tower Cold Chain is committed to ensuring that their direct employees are not paid lower than that required by law. We expect our suppliers to ensure our suppliers ensure that their pay will not be less than the level paid generally within that industry, if there is no applicable law in the country in which they operate.

**Modern Slavery (Forced Labour):** Tower Cold Chain has a policy of zero-tolerance towards acts of modern slavery which are unlawful and are a violation of fundamental human rights. Our

Modern Slavery & Human Trafficking statement is published on our website.

**Child Labour:** Tower Cold Chain complies with all relevant legislation regarding this; we will not employ young persons under the age of 18. We do not tolerate the use of child labour and require that our suppliers do not to use children in their operations (including in their value chain).

## Control

This policy will be monitored through regular auditing and monitoring and/or workplace inspections as appropriate.

Supplier on-boarding assessments will include evidence or written confirmation which ensures human rights are adequately respected and any ongoing audits and/or reviews (as appropriate) will ensure continued compliance with this policy.

## Review

This policy does not form part of any employee's contract of employment and may be amended at any time.

As a minimum, we will review this policy annually to ensure its ongoing suitability and, as and when there are key changes (e.g. customer, legislative, operational requirements etc.).

Our Policy will be communicated to all individuals working for, or on behalf of, the company and included in our Induction training. It is available to our employees via our company electronic systems.

It will be published on our company website and made available to all interested parties upon request.

**Approved by:**

Niall Balfour

Chief Executive Officer

Date: 08 March 2024