



HUMAN RIGHTS POLICY

DIRECTOR RESPONSIBLE: Neil Christie, Managing Director

EFFECTIVE DATE: 19/09/2023

LATEST REVISION DATE: 15/10/2024

VERSION NUMBER: 3

RELEVANT SDGS: 4, 7 & 8

Human rights are fundamental to the dignity and well-being of every person and are essential for creating a fair and just society. As a responsible business, Hazel 4D recognises the importance of ensuring that our operations and supply chain respect and promote human rights.

The policy is based on international human rights standards, including the Universal Declaration of Human Rights, and relevant national laws and regulations, including those in the United Kingdom.

Under this policy, Hazel 4D is committed to promoting and respecting the rights of all workers in our supply chain, including the right to fair treatment, safe working conditions (see Health & Safety Policy), and the elimination of discrimination (see Diversity & Inclusion Policy).

SCOPE OF APPLICATION

This human rights policy applies to all of the company's operations and activities, both in the UK and internationally. This policy applies to all employees, contractors, and other stakeholders who are involved in the company's operations and activities.

This policy is subject to review and update on a regular basis to ensure that it reflects the latest developments in the fight against slavery and exploitation, and to ensure that it aligns with the company's commitments and responsibilities.

RESPONSIBILITIES

The senior management team are responsible for the overall implementation and enforcement of this policy including the ongoing development and implementation appropriate strategies and initiatives.

Each business unit is responsible for ensuring that its operations and activities are in compliance with this policy, and for implementing and enforcing the policies and procedures necessary to achieve this compliance.

All employees and contractors are responsible for adhering to this policy, and for reporting any potential violations or non-compliances to their line manager or contact point. The company will provide training and guidance to employees, suppliers, and contractors on the requirements of this policy where necessary and will hold them accountable for their actions in relation to the policy.



OBJECTIVES

Our company is committed to respecting and protecting the human rights of all individuals. We recognise that human rights are universal and indivisible, and that they apply to everyone, regardless of nationality, race, religion, gender, gender reassignment, sexual orientation, age, or disability.

We are committed to acting in accordance with all applicable laws and regulations, including the Human Rights Act 1998 and the Equality Act 2010. We will not tolerate any form of discrimination or abuse of human rights within our company or in our business dealings.

Hazel 4D is committed to upholding the fundamental rights of its employees to freely associate with trade unions or labour organisations, as recognised by international labour standards and applicable laws. We will not discriminate against any employee based on their membership or non-membership in a trade union or labour organisation.

We will strive to create a safe, inclusive, and respectful work environment for all employees, and we will provide equal opportunities for all employees to reach their full potential.

We will work to identify and address any negative impacts that our operations may have on human rights, and we will seek to engage with and listen to the concerns of our stakeholders.

We have formal grievance procedures through which staff can raise personal and work-related issues (see Whistleblowing Policy). Any employee who suspects infringements of the policy or any of the above has the right to inform us without fear of intimidation. We will investigate any allegations of infringements of the Human Rights Policy and take appropriate action as necessary. Serious breaches by employees will be considered gross misconduct and may lead to their summary dismissal.

Due to the global reach of our supply and relations with companies in high-risk regions, we will conduct due diligence on our supply chain to identify and assess the risk of human rights abuse, and we will implement measures to mitigate any identified risks (see Sustainable Procurement Policy). We will also take positive steps to increase the number of our suppliers who provide evidence of complicity with our human rights policy and to take all reasonable steps to ensure that their own supply chains are free from human rights abuses.

Hazel 4D values the progression and development of its staff and encourages employees to undertake direct and indirect training, involving the achievement of recognised and certified qualifications. The company will take reasonable steps to accommodate these demands wherever possible.

QUANTITATIVE TARGETS

- By the end of 2023 we will ensure there are 0 instances of discrimination within the workplace.
- By the end of 2023 we will ensure 100% of employees have received human rights training as part of their induction and/or annual policy refresher training.
- By the end of 2024 we will ensure the percentage of our product supplier expenditure that is attributed to suppliers that are certified as meeting the company's human rights requirements has reached 75%.



REVIEW MECHANISMS

To ensure compliance with this policy, Hazel 4D will implement the following measures:

- **Due diligence:** We will conduct regular due diligence on our suppliers to ensure that they are in compliance with our human rights policy and applicable UK laws. This is comprised of onsite visits, virtual assessments and monitoring of supplier policies and processes. We will utilise our membership of Sedex and risk matrix to support our efforts in this area.
- **Training:** We will provide training to our suppliers and employees on human rights laws and regulations, including those in the UK, and best practices for preventing abuses in the supply chain
- **Quantitative targets:** We will monitor our performance against the quantitative targets highlighted above.
- **Stakeholder engagement:** We will engage with stakeholders, including employees, customers and suppliers, to gather feedback and input on our performance and to identify areas for improvement.
- **Continuous improvement:** We will adopt a continuous improvement mindset, seeking out opportunities to optimise operations and activities such as the adoption of new technologies or processes, or the implementation of best practices, to ensure compliance and promote our company values in relation to the prevention of human rights abuses.

Signed

A handwritten signature in black ink, appearing to read 'Neil Christie', written over a light blue horizontal line.

Neil Christie

Managing Director