



HUMAN RIGHTS & MODERN SLAVERY POLICY (HRFB.PO.031)

About this policy

At Frampton and Babel, we engage with suppliers, clients, and communities across the United Kingdom and overseas. We are continuously striving to deliver first-class customer service, whilst building and nurturing trust across our network of suppliers and customers.

In order to achieve this, we seek to act in accordance with internationally recognised human rights and standards, including the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights, making them integral to the way we operate. We're working to guard against being complicit in human rights violations and to uphold the human rights of our people and any other individuals that we're in contact with, either directly or indirectly.

Our commitments

We will seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner.

We will seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products and services through our business relationships.

We will provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts.

We will continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

We will not use child labour and will comply with all relevant laws in this regard. We do, however, support legitimate workplace apprenticeships, internships and other similar programmes that comply with the applicable laws and regulations.

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

All colleagues will work in an environment that is both safe and healthy, in line with our Health and Safety Policy

We prohibit physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Disciplinary and grievance procedures are clearly documented and communicated to all colleagues on our Breathe HR platform. All disciplinary measures of a serious nature are recorded and actioned.

We recognise that all its employees have the right to form and join organisations of their own choosing and as such, respect our colleagues' rights to belong to trade unions.

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



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We are committed to equal pay and benefits for men and women for work of equal value

We will, at a minimum, provide wages and benefits that meet the national minimum standards.

We will provide colleagues with clear written information on their pay and conditions. We prohibit deductions on colleagues' wages as a disciplinary measure.

We are fully committed to eliminating discrimination in recruitment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability, or social origin and to promoting equality of opportunity and treatment as outlined in our workplace policies.

We will provide written and clear contracts which detail the terms and conditions of employment. We will ensure that work performed by our colleagues is on the basis of recognised employment law and practice.

Remediation

Where a human rights violation is identified, we'll work with all parties involved to seek access to remedy, compensation, and justice for the victim. We'll also investigate the root cause so that we can take appropriate steps to prevent such a violation reoccurring. Further information can be found in our remediation policy.

Whistleblowing

Our whistleblowing policy is available to all colleagues and associated individuals who come across unethical behaviour that can't be resolved locally or for which the normal consultation process isn't suitable. Anyone raising a genuine concern which is in the public interest will be protected from victimisation.

Implementation and review

The HR Department has overall responsibility for human rights and modern slavery within our business. This policy acts as our overarching commitment, outlining the guiding principles behind our approach, and will be reviewed annually. The organisation's Modern Slavery Statement will be updated annually, within six months of the end of its financial year, and must be approved and signed by the Board of Directors.

Ethical Trading Initiative (ETI) Base Code

The ETI base code is founded on the conventions of the international labour organisation (ILO) and is an internationally recognised code of labour practice.

We believe that human rights and modern slavery can be effectively tackled through joint action and that's why we're proud to adhere to the 9 principles set out in the ETI base code, set out below.

Principle 1: Employment is freely chosen

- There is no forced, bonded or involuntary prison labour.
- Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.



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Principle 2: Freedom of association and the right to collective bargaining are respected

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- Worker representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Principle 3: Working conditions are safe and hygienic

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- The company observing the code shall assign responsibility for health and safety to a senior management representative.

Principle 4: Child labour shall not be used

- There shall be no new recruitment for child labour.
- Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.
- Children and young people under 18 shall not be employed at night or in hazardous conditions.
- These policies and procedures shall conform to the provisions of the relevant ILO standards.

Principle 5: Living wages are paid

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards, or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.



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Principle 6: Working hours are not excessive

- Working hours must comply with national laws, collective agreements, and the provisions of bullet points 2 and 6 below, whichever affords the greater protection for workers. Bullet points 2 and 6 are based on international labour standards.
- Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- All overtime shall be voluntary. Overtime shall be used responsibly, considering all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause bullet point 5 below.
- Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
 - This is allowed by national law;
 - This is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - Appropriate safeguards are adopted to protect the workers' health and safety; and
 - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14 day period

Principle 7: No discrimination is practices

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Principle 8: Regular employment is provided

- To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Principle 9: No harsh or inhumane treatment is allowed

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

This policy is not contractual, and we may amend it from time to time.



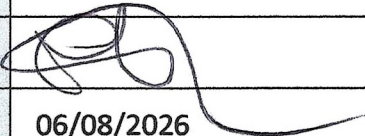
FRAMPTON AND BABEL LTD

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Approved by the Board of Directors and signed by a director for and on behalf of the Board.

Board approval date	03/08/2026
Director's full name	Carl Winstanley
Director's position	Co-owner
Signature	
Date signed	06/08/2026

Board approval date	03/08/2026
Director's full name	Sharon Winstanley
Director's position	Co-owner
Signature	
Date signed	06/08/2026