

## Bee Health - Human Rights Policy

Updated: 17 April 2023

At Bee Health, we are committed to protecting the human rights of all our people and of everyone who receives direct or indirect services from us. As a responsible, ethical organisation, we fully support the principles of the Human Rights Act and all associated legislation. This policy details the social and ethical standards we uphold as a company.

Our responsibility for human rights encompasses:

- Our operating sites – we will uphold the human rights of all employees, visitors, and contractors at our offices, staffed schemes, distribution centres and community facilities.
- Our supply chain – it is our aspiration to ensure that working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions.

This policy has been developed with reference to, the Human Rights Act 1998, the Modern Slavery Act 2015 and the Ethical Trading Initiative Base Code.

The key principles linked to the human rights policy include:

- Child Labour - We will not employ workers under the legal minimum age for work as stipulated by the Employment Act 2008.
- Forced Labour - We will not make use of any forced labour or debt-bondage labour in accordance with the Modern Slavery Act 2015.
- Discrimination - We will not discriminate against any person based on their protected characteristics and will uphold Article 14 of the Human Rights Act 1998 in respect of protection from discrimination.
- Discipline - We will not employ, or allow to be employed, any form of corporate punishment, physical coercion, or verbal abuse. Any disciplinary matter will be dealt with through formal procedures.
- Working Hours - Working time directives will be adhered to as per the Working Time Regulations 1998 with opt-out clauses publicised to staff.
- Remuneration - Wages paid for standard working hours will meet or exceed national minimum wage or living wage levels as appropriate.

## Modern Slavery Act 2015

As a company, Bee Health maintains relationships with many different organisations in its supply chain, as well as being one of the largest employers in Bridlington. Bee Health has a zero-tolerance approach to modern slavery both within the company and within its supply chain. We have reviewed our existing compliance and risk management processes following the introduction of the Modern Slavery Act 2015 to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains. The policy below underpins our approach.

Our code of conduct states that Bee Health respects fundamental human rights and is committed to the principles set out in the United Nations Universal Declaration of Human Rights. We support and respect the protection of human rights within our sphere of influence, in particular the effective elimination of compulsory labour and child labour. The code of conduct governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. This code of conduct applies to all our employees. Bee

Health expects equivalent standards of conduct from all persons acting on its behalf, such as suppliers and partners.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings. Our attitude to modern slavery is: zero tolerance.

## Purpose of this Policy

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of Bee Health with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

As a company, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

## What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Modern slavery can take many forms. It is a complex and multi-faceted problem. The Modern Slavery Act 2015 covers four key criminal activities:

- Slavery: where ownership is exercised over an individual.
- Servitude: involves the obligation to provide service imposed by coercion.
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them.

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA include, but are not limited to:

- Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical well-being or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights. You can read more about modern slavery here: <https://www.antislavery.org/slavery-today/modern-slavery/>

## Why do we need a policy?

We need a policy as we are committed to improving our practices to combat slavery and human trafficking as per section 54(1) of the Modern Slavery Act 2015. Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

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## Who is responsible for the Policy?

The Bee Health Board members, the Leadership Team and our partners at INW Corporate in USA are responsible for this policy.

## What Bee Health is doing?

This Human Rights policy which includes, modern slavery and human trafficking is publicised on our website. As per the requirements of the Modern Slavery Act, we are contacting relevant suppliers to our business and requesting they share their own modern slavery and human trafficking statement and processes.

We will conduct regular assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery. Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The following policies are available and are reviewed regularly:

- HR.GEN.POL02 Code of Conduct, which includes Young Workers and Child Labour policies
- HR.GEN.POL03 Equal Opportunities
- HR.GEN.POL05 Grievance procedure
- HR.GEN.POL06 Whistleblowing
- HR.GEN.POL18 Corporate Social Responsibility & Environmental, Social and Governance Principles (ESG)

As part of our initiative to identify and mitigate risk we are in the process of putting into place methods to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

## What are your responsibilities?

You are responsible to read, understand and comply with this policy. We ask you to avoid any activity that might lead to or suggest a breach of this policy and report any suspicions that this policy is not being upheld.

## What should I do if I suspect any modern slavery or human trafficking?

We encourage you to raise any concerns or suspicions you might have about the practice of modern slavery in any part of the Bee Health business or any of our suppliers at the earliest possible stage to Andrew Purvis, Finance Director at [Andrewp@beehealth.com](mailto:Andrewp@beehealth.com).

For further information on the Modern Slavery Act, please see [www.gov.uk](http://www.gov.uk) website.

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# Ethical Business Conduct and the Ethical Trading Initiative (ETI) Base Code

It is our deeply held belief that our ethos and values should guide our decisions and subsequent actions. We will deal honestly, openly, and fairly with all our stakeholders be they employees, clients, suppliers as well as the local and national community at large.

We are all responsible for our own actions and will be expected to act in a way which upholds the ethos and values which we believe are vital to our success:

- We will endeavour to exceed our clients' and customers' expectations through the continuous pursuit of excellence.
- We will be considerate, respectful, and responsive to the needs of others.
- We will always act with integrity.
- We will open our minds to new ideas and encourage innovation.
- We will strive to grow profitably and be financially responsible in all our dealings.

In all our operations, we require the highest ethical standards in the process of doing business. In operating these standards, we recognise our obligations to our employees, clients, suppliers, external organisations, and the wider community. This means we do all that we can to comply with legislation such as the UK Bribery Act 2010 and Modern Slavery Act 2015, which affect how we do business in certain ways.

The reputation of Bee Health and the trust and confidence of those with whom we deal is one of our most vital assets. The protection of this reputation is therefore of fundamental importance. You are always required to be honest and fair in your dealings. You are expected to operate within the law of the land. Corrupt practices of any sort will not be tolerated.

If you are in any doubt about a situation, or require a clearer interpretation of what is appropriate, legitimate, or ethical business behaviour, you must discuss this with a director. It is the responsibility of every employee to inform us of those situations where additional or appropriate guidance, interpretation or resolution is required, to ensure that both the spirit and the letter of ethical business conduct is upheld.

Bee Health believe in the ETI Base Code as detailed by the Ethical Trading Initiatives vision of a world where all workers are free from exploitation and discrimination, and enjoy conditions of freedom, security, and equity.

Ethical trade means that retailers, brands, and their suppliers take responsibility for improving the working conditions of the people who make the products they sell. We have committed to ethical trade and labour practice and expect our suppliers to work towards the same. Such codes address issues like wages, hours of work, health and safety and the right to join free trade unions.

The ETI Base Code is an internationally recognised set of labour standards based on the International Labour Organisation (ILO) conventions, we commit to:

- Employees choose to work for us freely.
- Employees have the freedom of association and the right to collective bargaining are respected, everyone has the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and to join trade unions for the protection of their interests.
- Working conditions are safe and hygienic.

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- Child labour shall not be used.
- Working hours are not excessive.
- Discrimination is not permitted or tolerated.
- Regular employment is provided.
- No harsh or inhumane treatment is allowed.

Ethical trading is championed by the Board of Directors and Leadership Team and cascaded throughout the business. We encourage you to raise any concerns in any part of the Bee Health business or any of our suppliers at the earliest possible stage to Andrew Purvis, Finance Director at [Andrewp@beehealth.com](mailto:Andrewp@beehealth.com).

## Reporting of violations

We encourage all staff to raise concerns regarding breaches or suspected breaches of the Human Rights policy. This can be done in person or electronically to Andrew Purvis, Finance Director at [Andrewp@beehealth.com](mailto:Andrewp@beehealth.com) or Tim Frear, Head of HR 24 hours a day 7 days a week. Telephone numbers and e-mail addresses are advertised on the company telephone list.

We encourage staff to raise issues face to face however if you would like to raise concerns regarding breaches or suspected breaches of the Human Rights policy without divulging your personal information, we ask that you write your with as much detail as possible confirming, where possible:

- What has happened, in as much detail as possible.
- What you believe the issue to be.
- The location of the incident or issue.
- The time and date of incidents or issues.
- Who was involved including any witnesses to the incident or issues.

Once complete, place in the HR post-box in Bee Health 1 (or) send to Bee Health addressed as private and confidential to Tim Frear, Head of HR (or) sent to either [tim.frear@beehealth.com](mailto:tim.frear@beehealth.com) or to Andrew Purvis [Andrewp@beehealth.com](mailto:Andrewp@beehealth.com).

### Document Control:

October 2021 - Policy HR.GEN.POL01 Human Rights Policy superseded QM.GEN.POL12 Modern Slavery Policy  
 April 2023 – Policy amendments include changes to reporting due to changes in organisational structure and slight formatting changes.

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