



ForFarmers Human Rights policy

1. Introduction

At ForFarmers, we believe that respect for all internationally recognized human rights is essential to our long-term success and sustainability. This Human Rights policy outlines our commitment to embedding human rights in all aspects of our business operations, and using our leverage towards our business relationships to encourage them to do the same. This policy will be reviewed and, where necessary, updated at least every 24 months. Any policy changes impacting the way ForFarmers conducts human rights due diligence will be taken into account in our internal processes.

2. ForFarmers' commitment

In the context of this policy, internationally recognized human rights include all rights defined in the United Nations (UN) Declaration of Human Rights and associated covenants and treaties, as well as the ILO Core Conventions. In line with the UN Guiding Principles on Business & Human Rights (UNGPs) and the OECD Guidelines for MNEs on Responsible Business Conduct (OECD Guidelines)¹, we understand that ForFarmers has the responsibility to integrate human rights considerations in the way we do business. This complements states' and governments' responsibility to protect human rights in their respective jurisdictions.

3. Scope and Applicability

This policy sets expectations of conduct for all ForFarmers employees, contractors, suppliers, business partners, and any other entities and stakeholders formally associated with our operations. It covers all activities and operations of ForFarmers, including our global value chains. We consider the upstream portion of our value chain to be the one at highest risk for adverse human rights impact, particularly rights of workers and communities.

4. Governance and oversight

All employees of ForFarmers have a responsibility in respecting human rights. However, the ultimate responsibility and accountability for the implementation of the Human Rights policy lies with ForFarmers' Executive Board, with regular updates on implementation and progress provided by senior management. They provide the strategic direction and are consulted on human rights issues with a high actual or potential impact or when (business) decisions need to be taken. A taskforce has been set up within ForFarmers, comprising various employees from different (local) departments chaired by the Director of corporate and legal affairs. This taskforce S&G monitors progress of the group S&G ambitions and as such, it will also monitor the implementation and progression of this policy. The taskforce will inform and update the Executive Board accordingly.

The daily implementation of this policy is led by the Group HR Director, supported by the local HR business partners, for all human rights matters pertaining to ForFarmers' own workforce and the CoE & Procurement Director, supported by the local management directors, for all human rights matters pertaining to the rights of workers in the upstream portion of the value chain. They work together with

¹ Recognizing that the OECD Guidelines are a broadly scoped document, for the purpose of this policy emphasis is placed specifically on Chapter IV – Human Rights.



other departments and specialists to create, respond and remediate on our salient human right issues when necessary.

5. Due Diligence process

In our approach to human rights, ForFarmers will prioritize issues that have a high likelihood of occurrence and high severity in terms of their scale, scope, and irremediable character. ForFarmers considers human rights due diligence to be an ongoing, process-oriented, proactive activity. In practice, we want to ensure that our due diligence efforts are kept manageable and realistic. Therefore, our processes will be informed by the OECD Guidelines statement that “the nature and extent of due diligence, such as the specific steps to be taken, should be appropriate to a particular situation and will be affected by factors such as the size of the enterprise, context of its operations, the specific recommendations in the OECD Guidelines, and the severity of its adverse impacts.”

In light of the evolving regulatory landscape, ForFarmers will develop a long-term approach to Human Rights Due Diligence, of which this policy will be the foundation.

5.1 Identification of actual and potential negative impacts

ForFarmers commits to conducting a salience assessment in accordance with the UNGPs. We recognize the importance of dialogue with employees, workers and other rights-holders who are or could potentially be affected by our conduct.

5.2 Prevention and mitigation of identified impacts

ForFarmers will commit to embedding the findings of the salience assessment by preventing and mitigating the adverse impacts identified.

Our [Code of Conduct](#) defines our values and the expected (ethical) behavior of our employees and all people acting for, or on behalf of ForFarmers.

ForFarmers will engage with its suppliers and partners to communicate the expectations and requirements outlined in this policy with regards to preventing and mitigating human rights issues. ForFarmers reserves the right to conduct assessments and audits of our suppliers and partners to ensure compliance with this policy as part of our own prevention and mitigation efforts. The [ForFarmers' Supplier Code of Conduct](#) is how we communicate our exceptions and requirements to our suppliers.

5.3 Tracking progress and reporting externally

ForFarmers will commit to track progress and improve as needed. We will report our progress and improvements made over the year annually with the publication of the annual report.

5.4. Access to remedy

The access to remedy mechanisms depends on the relationship between ForFarmers and the actual adverse impact. In line with the UNGPs, we commit on providing access to remedy in the cases it directly causes or contributes to a negative impact caused by, contributed by or linked to ForFarmers.



- a. *Reporting:* ForFarmers encourages employees, suppliers, and partners to report human rights concerns, if they are confronted or became aware of potential human rights issues or abuses and issues which may entail (suspicion of) wrongdoing within the supply chain through [ForFarmers' Speak-up Reporting Procedure](#).
- b. *No retaliation:* In no circumstances, ForFarmers will retaliate or allow retaliation against anyone who reports a potential violation.
- c. *Investigation and remediation:* ForFarmers will investigate any reports of violations of law or policy and, where appropriate and permitted by law, will take immediate appropriate corrective action. We commit that any violations of law or policy, including adverse human rights impacts, that we cause or contribute to, or are directly linked to, will be remedied, in good faith, through legitimate processes. ForFarmers aims to develop a remediation procedure for those affected by human rights violations.
- d. *Procedure for violations at suppliers or partners:* If ForFarmers suspects or identifies infringement of this Human Rights policy, appropriate measures will be taken, for example through corrective action plans. In case of severe human rights infringements, ForFarmers will suspend the business relationship with the supplier or partner. Subsequently, as a last resort action, relationships with business partners will be terminated if the supplier or partner is unable or unwilling to remedy their non-compliance. Nevertheless, prior to terminating the business relationship, we will assess if the adverse impact of doing so is expected to be less severe than the adverse impact that could not be prevented or adequately mitigated otherwise.
- e. *Reporting and grievance mechanisms at suppliers and partners:* ForFarmers expects its suppliers and partners to establish remedy mechanisms for any violations of this Human Rights policy and to ensure no retaliation against anyone who reports a potential violation.



Annex ForFarmers Human Rights policy

ForFarmers conducted a salient assessment to identify actual and potential negative impacts. While we respect all human rights, we focus our efforts on those adverse human rights impact at highest risk, considering the various value chain aspects with a human rights lens.

Salient topic	Upstream value chain	Own operations	Downstream value chain
Health and safety (workers) Safe and healthy working conditions.	•	•	•
Living wage The remuneration received for a standard workweek by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family.	•		•
Prohibition of child- and forced labor Children and young persons should be protected from economic and social exploitation. No one shall be required to perform forced or compulsory labor.	•		
Work-Life balance Right of everyone to the enjoyment of just and favorable conditions of work which ensure, in particular rest, leisure and reasonable limitation of working hours and periodic holidays with pay, as well as remuneration for public holidays.		•	
Equal opportunities and equal pay Fair wages and equal remuneration for work of equal value without distinction of any kind, in particular women being guaranteed conditions of work not inferior to those enjoyed by men, with equal pay for equal work.		•	
Right to a healthy environment (communities) Clean air, healthy and sustainably produced food and healthy biodiversity and ecosystems.		•	
Non-discrimination (including the rights of minorities and marginalized groups) All persons are equal before the law and are entitled without any discrimination to the equal protection of the law.			•