

GREGGS PLC HUMAN RIGHTS POLICY

Context

At Greggs, we believe that the talent and abilities of our people is what makes our business successful; which is why one of our core values is to aim to provide a great place to work, where our people will feel that they are valued.

We acknowledge that every employee, whether our own or our business partners', deserves the right to live and work with dignity. We therefore expect our people to hold themselves accountable to the highest possible ethical standards, with mutual respect for each other being the basis of this relationship. We also recognise our responsibility to encourage that sound social and ethical practices are upheld, not only within our own operations, but also within our supply chain and by our other business partners.

This policy defines the basic standards of human rights that we will respect at all times.

Our Commitment

Greggs is committed to upholding basic human rights and in doing so, we are committed to the following:

Working Hours and Leave:

- We will not use forced, bonded, indentured or involuntary prison labour.
- We will ensure that all work performed by our people will be on the basis of a recognised employment relationship. We believe that the use of zero hours contracts is inappropriate.
- We shall ensure that working hours comply with national laws and industry standards appropriate to the role and level of seniority. In general, our people will not be required to work in excess of a basic 48 hours per week. Any overtime will be voluntary and will be in line with the terms of our employment contracts.
- We will provide reasonable annual leave to each of our people, based on a clear formal policy.

Freedom of association

We recognise that our people, without distinction, have the right to join or form trade unions or other comparable legal organisations of their own choosing and to collectively make representations to, or enter into negotiations over, employment issues with us.

Working conditions

We are committed to ensuring the safety of our people and our customers.

- We will at all times provide a safe, clean and hygienic working environment.
- We will maintain a record of health and safety incidents with an action plan to improve performance by minimising the causes of hazards in the working environment.
- We will provide regular and recorded health and safety training to our people.
- We will assign responsibility for health and safety to a senior management representative.

- We will prohibit all forms of physical and verbal abuse, the threat of physical abuse, sexual harassment or other forms of intimidation are strictly prohibited.
- We will take only fair disciplinary action, proportionate and fully compliant with the law.

Child labour

- We will comply with all relevant child labour laws and not employ workers under the age of 16 and of school leaving age.
- We will maintain appropriate documentation and systems to prevent taking children into our employment.

Fair wages

- We will ensure that wages and all legally mandated benefits paid for regular hours of work meet, at a minimum, national legal standards.
- We will provide all our employees with written and understandable information about their employment conditions in respect of wages before they enter employment.
- We will not make deductions from wages (other than those prescribed by law) without the expressed permission of the employee concerned.

Discrimination

It is our policy to:

- treat all of our people with fairness, consideration and respect;
- provide equal opportunity for all in recruiting, developing, promoting and compensating without regard to race, religion, age, gender, disability, sexual orientation, gender identity, citizenship, national origin, or other legally protected status;
- maintain a professional, safe and discrimination free work environment;
- recognize our people based on their performance; and
- have a consistent and fair approach to the employee benefits we offer.

Sexual, racial, ethnic, religious or any other type of harassment has no place in our working environment. Racial, ethnic and religious harassment includes such conduct as jokes, intimidation or any other verbal or physical attack upon a person because of race, religion or national origin. Sexual harassment includes unwelcome sexual advances or other verbal or physical conduct of a sexual nature.

Listening to our People

It is one of our core values to be open, honest and appreciative towards our employees. We will listen to and take into account the views of our people. We will do this by, amongst other things:

- operating and encouraging our people to participate in our employee opinion surveys;
- enabling our people to raise queries and put forward suggestions directly to our Chief Executive;
- having in place a robust whistleblowing policy that enables our people to report any concerns on an anonymised basis.

Implementation

In order to achieve our commitment to upholding basic human rights, we undertake to:

- fully engage our management team and people by fostering free, direct and open communication among all;

- continue to observe and develop our other corporate social responsibility policies in support of this policy, including our Ethical Sourcing Statement.
- communicate about this policy to key employees including raising awareness of any behaviours or situations that may compromise our values to uphold basic human rights;
- assign responsibility for ethical standards to named responsible individuals who will provide the Board, our business partners and other stakeholders oversight of policy, principles and progress as required;
- audit and engage with our business partners to encourage, where possible, that they follow in the spirit of this policy;
- encourage employees to report, in confidence, any conduct engaged in or endured by any individual conducting business on our behalf, that may amount to a breach of this policy or may compromise our values around the provision of basic human rights;
- allocate funds for the implementation of this policy as deemed necessary;
- review and revise this policy on an annual basis.