

Ethical Trade and Human Rights Policy

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Version Control

Version	Date change(s) made	Change(s) made by	Summary of change(s)
V1.0	2020-02-26	N/A	N/A
V1.1	2021-06-21	CoSec	Replaced a reference to Whistleblowing Policy with Speak Out Policy
V2.0	2021-09-22	Susan Turner	Full review, incorporating 'Anti-slavery and Human Trafficking' and 'Trade and conflict'
V2.1	2022-08-24	Susan Turner	Change of document owner and minor formatting updates. Clarification of the ETI Base Code clauses.
V2.2	2023-09-26	Susan Turner	Minor formatting changes, introduction of 'Core values' & updates to 'Human rights' section.
V2.3	2026-07-31	Susan Turner	Introduced references to the Sanctions Compliance Policy, reviewed inclusion of specific terminology to align with 'Green Claims'.

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1. Introduction

Bettys & Taylors Group Ltd (“BTG”) has complex operations and supply chains that are dependent on millions of people around the globe. As a values-based, family-owned business we recognise the need to protect the rights of both the individuals and the communities linked to our trading activities. This policy sets out the ethical trading standards expected by BTG, to protect human rights across the full range of our business activities and relationships, including our own operations and global supply chains. It operates alongside our wider legal and regulatory obligations in the jurisdictions in which we operate and trade.

2. Policy objectives / purpose

This policy outlines the minimum standard we expect to be in place throughout our operations and supply chains to protect human rights and to comply with our legal and moral obligations, especially in consideration of the UK Modern Slavery Act 2015 and following the provisions of the UN Guiding Principles on Business and Human Rights (UNGPR). It further outlines our approach to trading fairly.

3. Related policies

This document is part of a broad suite of policies that ensure we treat all our stakeholders in line with our values, whilst minimising the impact our business activities have in the world. It should be read in conjunction with the following BTG policies and codes:

- Anti-bribery & Corruption Policy
- Sanctions Compliance Policy
- Code of Conduct: Standards for Sustainable Supply
- Environmental Policy
- Purchasing Policy
- Speak Out Policy

4. Who this policy applies to

This policy applies to all key stakeholders engaged in our business activities, including directors, employees, agency workers, seconded workers, volunteers, agents, contractors and suppliers. The policy applies to our suppliers through integration into the 'Standard Purchase Terms', which reference BTG policies published at <https://bettysandtaylors.co.uk/resources-policies/>. BTG representatives responsible for engaging with external stakeholders are required to communicate and use the policy in discussion and while contracting with those stakeholders.

In some circumstances, legal or regulatory requirements may extend beyond our direct suppliers to other parties connected to our trading activities, such as agents, distributors

or logistics providers.

5. Our sourcing approach

BTG's values and ways of doing business are clearly defined and embedded across our Group and are recognised as improving the lives of people, communities and the planet. Central to these ways of working is our commitment to developing enduring, mutually beneficial relationships with suppliers who share our values and maintain the highest standards of quality and ethics.

Our approach to sourcing is based on collaboration; we work in close partnership with our suppliers to build long-term sustainable relationships, improve quality, and invest in addressing material sustainability challenges. We commit to paying sustainable prices for quality products, based on fair terms of trade.

6. Due diligence



BTG Human Rights Due Diligence Approach

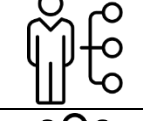
We strive to identify and confront the risks of human rights abuses, wherever they occur. To do this, we must increase visibility and deepen our understanding, allowing us to provide more effective remedy and work towards fully equitable supply chains.

Our human rights due diligence approach is based on the UN Guiding Principles which set out best practice for businesses and human rights.

The Guiding Principles are founded on three pillars:

1. Protect – states have a duty to protect, promote and support human rights
2. Respect – companies have a responsibility to respect human rights and “do no harm”
3. Remedy – both must ensure that victims of business-related abuses have access to effective remedy.

Expanding on these pillars we take a six-step approach:

1.		Commit: We make public and internal policy commitments and establish clear targets and Key Performance Indicators (KPIs).
2.		Assess: We map inherent and specific risk in supply chains.
3.		Implement: We develop and apply action plans – working closely with stakeholders to improve standards and reduce supply chain risk.
4.		Remedy: This may relate to a specific instance but also includes targeted development to address underlying, systemic issues through supply chain investment.
5.		Monitor: We monitor progress through continued assessment, audits and checking performance against KPIs.
6.		Communicate: We report on progress and challenges to an agreed frequency.

7. Core values

We follow the Ten Principles of the UN Global Compact (UNGC). These principles establish core values in human rights, labour standards, the environment and anti-corruption:

Human rights

1. Support and respect for internationally proclaimed human rights
2. Ensuring there is no complicity in human rights abuses

Labour standards

3. Freedom of association and the right to collective bargaining are respected
4. Elimination of all forms of forced and compulsory labour
5. Effective abolition of child labour
6. Elimination of discrimination in relation to employment and occupation

Environment

7. Support for a precautionary approach to environmental challenges
8. Undertake initiatives to promote greater environmental responsibility
9. Encourage development and use of environmentally friendly technologies

Anti-corruption

10. Work against all forms of corruption, including extortion and bribery

8. Human rights

As a minimum standard, our activities ensure that the conventions of the International Labour Organisation (ILO) are adhered to by following the Ethical Trading Initiative (ETI) Base Code. The ETI Base Code is accepted as a global reference standard and is widely used as a benchmark against which to conduct social audits and develop ethical trade action plans. By adopting the ETI Base Code, we observe the following nine clauses:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages* are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

*Please note that all references to living wage refer to the definition in the ETI Base Code and do not require compliance with any other living wage benchmark standards, which are recognised as a work in progress.

For more detailed information about each clause, including definitions, refer to the pages on the Ethical Trading Initiative website at [ETI Base Code | Ethical Trading Initiative \(ethicaltrade.org\)](https://ethicaltrade.org).

9. 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.

Bettys & Taylors Group is committed to ensuring that all workers employed by us, or in our operations, as well as those in our global supply chains and wider business relationships, enjoy safe and fair treatment in their workplace. We have a zero-tolerance approach to modern slavery and we're committed to:

- implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains;
- ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our global supply chains and;
- publishing a Modern Slavery Statement on our website for each financial year and in line with our disclosure obligations under the UK Modern Slavery Act 2015.

Responsibility for the prevention, detection and reporting of modern slavery in any part of our business, or our global supply chains falls to all stakeholders. As such, we ask that any concerns or suspicions of modern slavery are raised at the earliest possible opportunity. The mechanisms for reporting are communicated widely, including through our Speak Out Policy and Code of Conduct, while the internal reporting routes are trained as part of role profiles. We are committed to ensuring no one suffers any detrimental treatment because of reporting, in good faith, their suspicion that modern slavery, of whatever form, is or may be taking place in any part of our own business, or in any of our supply chains.

10. Trade & conflict

Conflict may include war, acts of terrorism, the funding of terrorism, or gross human rights abuses such as genocide, ethnic cleansing and crimes against humanity. For the purposes of this policy, conflict affected areas may include:

- areas experiencing active armed conflict;
- fragile or post conflict regions;
- areas with weak, non existent or contested governance; and
- areas where there are widespread or systematic violations of international law, including human rights abuses.

Many of the regions we work with are either currently experiencing conflict, at risk of conflict, or in a post-conflict state. We recognise the potential for trade to have a positive and stabilising impact in these areas. Furthermore, the disruption to trade and economic activities resulting from conflict is a key constraint to development. Our aim is to ensure our trading relationships and operations help promote resilience and we will aim to protect these relationships where possible.

However, there are circumstances in which trade may exacerbate conflict, contribute to human rights abuses or be prohibited by law. We will not trade with individuals, entities, regions or countries where one or more of the following apply:

- trade is restricted or prohibited under applicable law or regulation;
- conflict creates an unacceptable risk to the safety or rights of workers or communities;
- there is clear, independently sourced evidence that trade or the resources being traded are a significant factor contributing to conflict or serious harm;
- the internationally recognised, democratically elected representatives of a state or territory call for the suspension of trade; or
- the status of a territory or state is subject to international dispute or occupation, as recognised by relevant international legal frameworks or United Nations resolutions.

Where trade is restricted or prohibited by law, including under applicable sanctions regimes, we will not trade regardless of other considerations.

Legal trade restrictions are managed through established compliance processes. These processes address legal requirements affecting international trade, such as sanctions, export or import controls, trade prohibitions and other applicable regulatory restrictions. Further detail on how sanctions-specific risks are identified and addressed is set out in our Sanctions Compliance Policy and associated guidance.

Decisions to restrict or withdraw trade for ethical, conflict-related or human rights reasons will be taken carefully and on a case-by-case basis, informed by expert advice and recognised international standards.

11. Achieving transparency & working with partners

To promote transparency, BTG works with its trading partners to improve visibility across our supply chains. We use a combination of information-sharing platforms, direct engagement and, where appropriate, public disclosure of supply chain information for key commodities.

Based on our risk assessment processes, we apply proportionate measures to identify and address ethical trade and human rights risks. These may include the use of third-party platforms, self-assessment questionnaires, certification schemes, audits and other independent or collaborative review mechanisms, selected according to risk, context and the nature of the supply relationship.

Our trading partners are expected to have systems in place to uphold ethical trading standards throughout their own supply chains. Our expectations are set out in our *Code of Conduct: Standards for Sustainable Supply*, which underpins ongoing dialogue and engagement.

In line with our values and sourcing approach, our default approach is to work with trading partners to remediate issues responsibly and support improvement, rather than to disengage. Where appropriate, we also work through wider initiatives and collaborations to address underlying causes and promote lasting change.

Where serious or persistent non-compliance occurs and meaningful progress cannot be achieved, BTG may take further action. Any decision to suspend or withdraw trade will be taken carefully and proportionately, with consideration of potential impacts, and may include time-bound corrective actions, temporary suspension of supply or, as a last resort, termination of the trading relationship. Actions will always be undertaken in line with applicable legal requirements.

12. Communication and awareness of this policy

Communication of this policy should be made to all appropriate suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate.

13. Breaches of this policy

We will take any breaches of this policy seriously and any employee who breaches this policy may face disciplinary action. We may decide to end our relationship with other individuals and organisations working on our behalf if any of their actions conflict with this policy.

Breaches involving sanctions non-compliance may also result in legal consequences and will be managed in accordance with the Sanctions Compliance Policy.