

## Policy Statement

The UN Guiding Principles on Business and Human Rights (UNGPs), which were adopted by the United Nations in 2011, set out the principle that businesses have a responsibility to respect human rights. This responsibility is considered to be a **global** standard of the conduct to be expected from all organisations wherever they operate and is separate to any voluntary initiatives that we may participate in, such as the UN Global Compact or the OECD Guidelines.

The United Nations Office of the High Commissioner for Human Rights states:

‘Human rights are rights inherent to all human beings, whatever our nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. We are all equally entitled to our human rights without discrimination. These rights are all interrelated, inter-dependent and indivisible.

Universal human rights are often expressed and guaranteed by law, in the forms of treaties, customary international law, general principles and other sources of international law. International human rights law lays down obligations of Governments to act in certain ways or to refrain from certain acts, in order to promote and protect human rights and fundamental freedoms of individuals or groups.’ Freedom is a fundamental human right and the UK Modern Slavery Act 2015 recognises the important part businesses can and should play in tackling slavery. The Modern Slavery Act has global scope so applies to all of our operations regardless of where they are in the world.

IVC Evidensia (The Group) operates as a responsible international business. One of the guiding principles of our values, and a pillar of our Positive Pawprint Strategy, is to respect people and animals. We operate in an increasingly international business environment with complex supply chains and our operations can have an impact, good or bad, on human rights. Our success can be achieved only when we treat everyone, both inside and outside of the Group, with respect and as such are committed to respecting the human rights and dignity of individuals. Our support of internationally recognised Human Rights is consistent with our dedication to enriching our workplace, partnering with our supply chain, preserving the environment and supporting the communities where we operate.

We are committed to the highest standards of business and ethical behaviour including compliance with all applicable laws and regulations, as well as company policies, practices and procedures.

## Scope

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This policy applies to all colleagues, consultants, contractors and third parties providing services to, or working for, The Group regardless of location. We seek to ensure we are not complicit in human rights abuses by any other person, organisation or government. Any actual or potential violation of human rights caused or contributed to by our activities or business relationships must be reported as soon as possible in accordance with our whistleblowing procedures (colleagues) and Supplier Code of Conduct (suppliers).

This policy does not form part of any contract of employment, and it may be amended at any time.

## Objectives

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The objectives of this policy are to:

- Support and respect all internationally recognised human rights;
- Contribute to the recognition of human rights globally;

- Ensure all colleagues and business partners are informed of our commitment to human rights and adhere to our expectations in this area.

## Policy

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### **RESPECT**

We treat people with respect and dignity. Our colleagues and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity. We aim to ensure that where national laws differ from international human rights standards or our own policies and procedures we will, so far as possible, follow the higher standard. We conduct our business in a manner that respects the rights and dignity of all people, complying with all legal requirements.

### **DISCRIMINATION**

We strive for and foster a workplace free of harassment, intimidation, inhumane treatment and discrimination. We are committed to the elimination of discrimination based on gender, race, class, economic status, ethnic background, sexual orientation, age, political beliefs, veteran status, marital status or any other protected class. We have zero tolerance for retaliation, which includes threats, intimidation, exclusion, humiliation and raising issues maliciously or in bad faith.

### **DIVERSITY**

Diversity is embraced within The Group. We respect the rights of individuals belonging to groups or populations which may be particularly vulnerable to adverse impacts, including: indigenous people; women; national or ethnic, religious and linguistic minorities; children; homeless; and migrant workers and their families. We recognise that a diverse mix of backgrounds, skills and experiences drives new ideas, products, and services and provides us with a sustained competitive advantage.

### **FORCED LABOUR**

We prohibit forced, bonded, trafficked and child labour. Our labour rights and modern slavery principles reiterate that we expect our colleagues and suppliers to respect workers' rights, in line with the International Labour Organisation [ILO Declaration on Fundamental Principles and Rights at Work](#).

All employment within The Group is voluntary. We do not tolerate from our own business, or those we do business with, any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude. We fully respect all applicable laws establishing a minimum age for employment, to support the effective abolition of child labour worldwide.

With this in mind, we need to pay particularly close attention to:

- our supply chain
- any outsourced activities, particularly to jurisdictions that may not have adequate safeguards
- cleaning and catering suppliers
- corporate hospitality

Each year we produce a modern slavery statement which can be found on our website and the government's online modern slavery statement registry.

### **WORKING HOURS**

We are committed to ensuring that those who work for and with The Group have working hours and annual leave requirements that are fully compliant with national laws and collective agreements and that overtime is voluntary and not excessive.

## **RECRUITMENT**

We recruit ethically. Respect for our colleagues' human rights is integral to our recruitment, management and diversity and inclusion processes.

- We only use reputable recruitment agencies
- We ensure the agency provides assurances that the appropriate checks have been made on the person they are supplying
- We prohibit practices that impede the possession of or unrestricted access to personal identification documents
- We always ensure all colleagues have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work
- We provide fair wages and benefits and abide by all laws and regulations regarding pay practices and the classification of employment according to job level and status
- We always ensure colleagues are legally able to work
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to

## **HEALTH & SAFETY**

We are committed to providing safe and healthy working environments for our colleagues.

## **FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING**

We will respect laws concerning non-interference in our colleagues' right to form or join a trade union or to bargain collectively, as well as their right not to do so. Where our colleagues wish to be represented by trade unions or works councils, we will co-operate in good faith with the bodies that they collectively choose to represent them. In situations where freedom of association is restricted or prohibited by law, we will be open to and supportive of alternative means of colleague representation and engagement.

## **RESPECTING THE RIGHTS OF OUR CUSTOMERS & COMMUNITIES**

Our Code of Ethics outlines our principles for engaging with customers and local communities. We will design, implement and regularly review systems that promote the welfare of animals in our care, adhering to all relevant national legislation. We will engage with processes that reduce the occurrence of infectious animal diseases and zoonoses and show respect to future generations by minimising the impact our business has on the environment, developing relationships with suppliers who share this ideal. We compete fairly, and make our own independent commercial decisions. We are committed to honest, transparent and accurate communications with clients, whether in advertising, product information or more detailed reporting. *Customers and local community can ask questions and raise concerns through [compliance@ivcevidensia.com](mailto:compliance@ivcevidensia.com).*

## **SUPPLIERS**

We seek to make contractual agreements with our suppliers that require them to respect internationally recognised human rights in their work that are consistent with the commitments in this policy and our Supplier Code of Conduct. Our Supplier Assessment and Code of Conduct

reinforce and support our commitment to respect human rights and seek affirmation from our suppliers that they will meet our required standards. The Supplier Assessment is the tool for communicating the expectations in the Code to our suppliers, including contractors, vendors and providers of services. These documents also require our suppliers communicate those standards to their colleagues, suppliers and business partners who may provide goods or services to us. We want to work with business partners who share our commitments to safety, ethics and compliance and we will take appropriate measures where they do not meet those expectations or obligations. Our supplier contracts include an anti-slavery clause.

### **REPORTING & ACCESS TO REMEDY**

If you spot a concern, then talking to someone about it may stop someone else from being exploited or abused. If you think that someone is in immediate danger, dial 999. Otherwise, you should discuss your concerns with [compliance@ivcevidensia.com](mailto:compliance@ivcevidensia.com) who will decide a course of action and provide any further advice.

We seek to make grievance mechanisms available to our workforce. Colleagues are expected to report grievances to their respective HR teams. For whistleblowing matters, colleagues and associated persons are encouraged to report any concerns that they may have via [speakup@ivcevidensia.com](mailto:speakup@ivcevidensia.com) or through our [external speak-up facility](#) . Individuals are also welcome to raise concerns to their line manager or a member of the Group Executive.

We are committed to encouraging our colleagues and suppliers to speak up without retribution about any concerns they may have. Where we have caused or contributed to adverse human rights impact, we will contribute to their remediation as appropriate and incorporate lessons learned into our policies and processes to prevent future impacts.

### **Roles and Responsibilities**

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The Executive Team has overall responsibility for ensuring our commitment to respect human rights is put into practice and for the implementation of this policy.

As an organisation we will:

- maintain clear policies and procedures to ensure respect for human rights across all areas of our business
- assess our human rights impacts, especially when entering new markets
- be clear about our recruitment policy
- assess and take steps to manage human rights risk within our supply chain
- lead by example by making appropriate checks on all colleagues, recruitment agencies, suppliers, etc to ensure we know who is working for us
- ensure we have in place an open and transparent grievance process
- seek to train and raise awareness among our colleagues, suppliers and business partners so that they understand our policy and their role in implementing it
- make a clear statement to demonstrate that we take our responsibilities seriously

The Chief People Officer has day-to-day responsibility for the implementation of this policy and our business and human rights programme and for ensuring that any breaches are investigated. Management at all levels are responsible for ensuring those reporting to them is made aware of and understand this policy and are given adequate and regular training on it.

**All colleagues must:**

- Read and understand the policy;
- Complete training annually;
- Behave ethically;
- Report concerns.

If you are unsure about how this Policy might affect your activities or have any questions about its application contact your manager, or the Legal and Compliance team.

**Communication, Training & Implementation**

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We recognise our responsibility to respect human rights and avoid complicity in human rights abuses and complete training to ensure that colleagues adhere to the fundamental rights and are aware of the key signs that could indicate slavery or trafficking (Appendix 1).

This policy will form part of our annual training release programme of corporate policies which requires all colleagues to read and confirm understanding through our LMS platform. The policy will be accompanied by appropriate e-learning in those countries where this is available to ensure all colleagues understand the policy.

All new colleagues will receive training on Human Rights as part of their induction. The procurement team will review and identify key suppliers to work with and determine whether training support is required. For those roles where there is higher risk in this area such as procurement and Human Resources we will provide more detailed training.

**Evaluation**

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We report annually to stakeholders on the implementation of this policy in a number of relevant disclosures, including our Positive Pawprint sustainability report, Modern Slavery Statement and our annual report. We will review this policy regularly. We will provide information and/or training on any changes we make and continue to assess the evolving risks within the business and take appropriate measures as required.