



HERO GROUP HUMAN RIGHTS POLICY





INTRODUCTION AND SCOPE

Human rights are fundamental and should be respected and protected at all times. As a multinational food business, we are committed to upholding internationally recognised human rights in all our operations, including our supply chain and interactions with local communities. This commitment is implemented through the following pillars:

1. Applying this Human Rights Policy;
2. Conducting human rights due diligence and disclosure;
3. Providing access to remedy;
4. Maintaining oversight, governance, and accountability; and
5. Protecting human rights defenders;

The Policy itself is aligned with the HERO Group's commitment to ethical conduct expressed in its Code of Conduct and other Corporate Policies that directly or indirectly include a commitment to protecting people's fundamental rights.

Our Human Rights Policy is based on the Universal Declaration of Human Rights, and the International Labour Organization's Declaration on the Fundamental Principles and Rights at Work. In alignment with the United Nations Guiding Principles on Business and Human Rights, we acknowledge that our company has a responsibility to respect human rights, as well as a responsibility to ensure that our activities do not cause or contribute to human rights violations.

1. APPLYING THIS POLICY

This Policy applies to all companies of the HERO Group and therefore all employees are required to know, understand and comply with the provisions contained in this Policy, especially those who, due to their position of responsibility, manage teams or have the power to make decisions, enforce them or influence others.

The fact that the HERO Group operates in various countries means that the company has to coexist with a great diversity of legal systems and working and socio-cultural environments. For this reason, this Policy and its implementation will respect the legal frameworks in force in the countries where the company operates and will serve as an inspiration to act beyond the legal requirements in those countries with less demanding regulatory frameworks.





Our commitment is also applicable to representatives, suppliers and other third parties who provide services or products to the HERO Group or who, in any way, act on behalf of HERO, such as partners, intermediaries or subcontracted companies, regardless of the territory in which they carry out their activity (hereinafter referred to as "Business Partners(s)").

The Principles of Action

The HERO Group adopts and promotes the following basic principles that are aimed to govern its actions:

1. **Respect for Human Dignity:** We will respect the dignity of every individual, regardless of their race, gender, religion, age, or any other characteristic. We will not tolerate discrimination, harassment, or any form of abuse.
2. **Freedom of Association and Collective Bargaining:** We recognize the rights of our employees to join unions and engage in collective bargaining. We will not interfere with these rights and will work with unions and employee representatives in good faith.
3. **Wages and Hours:** We will provide fair wages that are equitable and transparent. We will adhere to local laws regarding weekly working hours and overtime. Where there is no legal limit, we will adhere to ILO Convention No. 1 which, in conjunction with other conventions, has set that standard to 48 regular hours per week with a maximum of 12 hours overtime.¹
4. **Health & Safety:** We will provide a safe, healthy and secure workplace and will consistently strive for continuous improvement.
5. **Forced Labour:** We will not tolerate the use of any forms of forced labour, including prison labour, indentured labour, modern forms of slavery and any form of human trafficking.
6. **Child Labour:** We will not hire individuals under the legal working age or the mandatory age of schooling (whichever is lower). Young Workers under the age of 18 will not be assigned hazardous work. This includes all work that is mentally, physically, or socially dangerous or that deprives them of the opportunity to attend school.²

¹ <https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/working-time/lang--en/index.htm>

² https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312283:NO

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7. **Engaging with our Suppliers on Human Rights:** We will cascade our expectations down the supply chain with the goal that our suppliers and contractors also respect human rights and meet our standards for our sourcing. We will work with them to identify and address any human rights risks and will not start a business relationship with prospective business partners who do not accept this policy.
8. **Community Engagement:** We will engage with local communities in a respectful and meaningful way. We will respect their culture, traditions, and rights, and will work to minimize any negative impacts our operations may have on them.
9. **Transparency and Accountability:** We will be transparent about our human rights policies and practices and will report on our progress in implementing them. We will also ensure that our employees and suppliers are aware of our policy and their responsibilities under it.
10. **Continuous Improvement:** We recognize that upholding human rights is an ongoing process and we will review the policy at least every two years and improve our policy and practices. We will also engage with stakeholders, including human rights organizations, to ensure that we are meeting our responsibilities and contributing to the protection and promotion of human rights.

2. CONDUCTING HUMAN RIGHTS DUE DILIGENCE AND DISCLOSURE

The implementation and monitoring of the commitments set out in this document are based on appropriate human rights due diligence process in line with the expectations of the UN Guiding Principles for Business and Human Rights. This specifically relates to our salient risks, the potential adverse human rights impacts in our business and value chain that we have caused or contributed to. We commit to this process with the awareness that this is an ongoing task which requires commitment, time and transparency, to address any identified impacts and/or provide remedy.

Our due diligence process has four key components:

1. **Identifying and assessing actual or potential adverse human rights impacts**
 2. **Integrating findings from impact assessments across relevant HERO Group processes**
 3. **Tracking the effectiveness of measure**
 4. **Communicating on how impacts are being addressed**
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For more information on the implementation and progress of our due diligence process please refer to [insert link to HERO website page or sustainability/annual report section on Human Rights].

3. PROVIDING ACCESS TO REMEDY

Grievance Mechanism

The HERO Group provides its employees and stakeholders, including suppliers and other business partners, with an anonymous direct channel as a confidential means to communicate any doubts that may arise regarding the interpretation or application of this policy and related regulations, as well as to report any irregularity, wrongdoing or infringement detected in relation to the policy or any behavior that affects the rights of individuals.

This channel can be publicly accessible through <https://hero.speakup.report/es/speakup/home>. Employees have also been provided easy and anonymous access to SpeakUp® through different physical and online means.

All communications received through this channel are treated in accordance with the principles of confidentiality, respect, integrity, privacy and security, with full respect for rights and guarantees in the process, both in the analysis and verification of the communications received and in their resolution and, when necessary, adoption of corrective measures. Moreover, in line with what is required by the EU “Whistleblower Directive”³, SpeakUp® introduces effective, a confidential and secure reporting channel that ensures that whistleblowers are protected effectively against retaliation.

Access to Remedy

At HERO, we are committed to upholding human rights throughout our operations and supply chain. We recognize that, despite our best efforts, there may be instances where our actions or those of our business partners inadvertently result in adverse human rights impacts. In such cases, we are dedicated to providing access to effective remedies for those affected, so that impacted individuals have a fair and accessible process for seeking redress. Where we identify that our actions or omissions have caused or contributed to adverse human rights impacts, we will take appropriate remedial actions. This may include:

³ Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law



- Collaborating with affected parties to determine appropriate remedies, including restitution, compensation, rehabilitation, and prevention of future harm.
- Implementing remedies promptly and effectively, while also considering potential unintended consequences.
- Taking immediate steps to halt the adverse impacts and prevent their recurrence.

Moreover we are committed to continuously improving our human rights performance, including our approach to addressing grievances and providing access to remedy. To this regard we shall:

- Periodically review and assess the effectiveness of our grievance mechanisms and remediation processes.
- Learn from both successful and unsuccessful remedies to enhance our policies and practices.
- Engage with relevant stakeholders, including affected communities, experts, and civil society organizations, to gain insights and feedback and to share best practices and contribute to the development of effective remedy mechanisms beyond our organization.

4. MAINTAINING OVERSIGHT, GOVERNANCE AND ACCOUNTABILITY

This policy was approved by the HERO Group [Board of Directors](#) who oversees our work on human rights. Ownership and management of our work on human is allocated to the relevant division and function within HERO Group.

The HERO Group Chief People Officer is the designated [EB member](#) responsible for Human Rights.

5. PROTECTING HUMAN RIGHTS DEFENDERS

In line with the UN Declaration on human rights defenders⁴, we acknowledge the crucial role that human rights defenders play in realising and upholding human rights. HERO Group plans to engage with human rights defenders amongst other affected stakeholders as an essential part of ongoing human rights due diligence.

⁴ <https://www.ohchr.org/en/special-procedures/sr-human-rights-defenders/declaration-human-rights-defenders>

