

Twinings Ovaltine Human Rights Policy

Our approach to human rights

At Twinings Ovaltine, respect for human rights is a principle firmly embedded in the way we operate and source. We recognise that it is our responsibility to respect human rights and avoid adverse impacts, in line with the UN Guiding Principles on Business and Human Rights. We recognise our responsibility towards specific vulnerable groups, including women, children and migrants. We commit to upholding the rights of human rights defenders, and those expressing their right to freedom of association, expression, peaceful assembly and protest.

We also believe that we have the ability to positively impact the human rights of our employees, people in our supply chain, and their communities.

The Twinings Ovaltine Human Rights Policy is informed by the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), the UN Convention on the Rights of the Child, the UN Convention on the Elimination of All Forms of Discrimination against Women, the UN Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, the ILO's Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, as well as the Children's Rights and Business Principles, and the UN Women's Empowerment Principles.

Where national law and international human rights standards differ, we will aim to follow the higher standard. Where national law and international human rights standards are in conflict, we will adhere to national law, while still seeking to respect international human rights principles.

Policy Governance

The Twinings Ovaltine Human Rights Policy is signed off by our Chief Executive Officer, overseen by our leadership group of General Managers, and implemented by our Social Impact Team.

Our leadership group of General Managers, which contains our CEO, CFO and all of our operational country heads, are informed annually of salient human rights risks across the markets in which we operate and source from.

Human rights due diligence

We continually assess salient human rights risks in the territories where we currently operate and source from, and use human rights due diligence to assess risks when we begin operating in or sourcing from new geographies.

Our goal is to prioritise action, using a risk-based approach, where we believe we can make the most valuable contribution.

Grievance Mechanisms and Access to Remedy

We stand strongly against the abuse of human rights anywhere in our own operations and supply chain, and we recognise that access to effective grievance mechanisms is an integral part of identifying where abuse might take place. We have a company-wide Whistleblowing Hotline, and our Code of Conduct outlines the expectation placed on suppliers to provide effective, transparent, accessible grievance mechanisms in our supply chain.

We take seriously any allegations that human rights have not been respected, and we recognise the importance of effective mechanisms to allow people to raise complaints and concerns.

Where we become aware of potential adverse human rights impacts in our operations or in our supply chain, we are committed to doing what we can and cooperating with others to try to find appropriate remediation.

We also support access to state-based judicial or non-judicial mechanisms, where individuals make allegations of adverse human rights impacts.

Collaboration

We have a strong belief that we're well placed to accelerate change when we work with others. We work with our suppliers, the governments of the countries we operate in and source from, unions, civil society, other businesses, and most importantly the people who work in our supply chain, and the communities they live in. These stakeholders help to inform our approach and gain deeper insight into the risks in any particular market that we operate in. Most importantly, we believe that through collaboration, we are better placed to help tackle any systemic human rights risks facing people in our supply chain.

Reporting

We are committed to continually updating our stakeholders on our progress in implementing this policy. We do this through our Human Rights Position Statement and Update, which can be found on our website: sourcedwithcare.com



Bob Tavener,
CEO
Twinings Ovaltine