Labour & Human Rights and Modern Slavery Policy

Purpose

H Foster 1875 is committed to running our business in a way that protects the health, safety and welfare of our employees, and to respecting and promoting labour and human rights across our own operations and our supply chain. This policy is guided by the UN Guiding Principles on Business and Human Rights (UNGPs) and the Universal Declaration of Human Rights.

We believe that every individual, whether an employee, contractor, supplier or business partner, deserves to be treated fairly and with respect. This policy sets out our commitments, targets and how responsibility for them is allocated. It supersedes and incorporates in full our previous standalone Modern Slavery and Human Rights Policy (dated March 2026).

Modern Slavery Act 2015

H Foster 1875 Ltd is not currently required to publish a modern slavery statement under section 54 of the Modern Slavery Act 2015, as its turnover does not meet the applicable statutory threshold. H Foster 1875 however, applies the principles of the Act to its own operations and supply chain and has zero tolerance for modern slavery.

Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking. It can also include forced or bonded labour, debt bondage, restricting a person's freedom of movement, withholding identity documents, or requiring workers to pay recruitment fees. H Foster 1875 will not knowingly permit or tolerate these practices within our operations or supply chain.

We expect our suppliers and business partners to share this commitment and to take appropriate steps to identify, prevent and address modern slavery and other labour and human rights risks within their own operations and supply chains

Scope

This policy applies in two parts:

- Employment conditions apply to all direct employees of H Foster 1875, as set out in the current company organisation chart.
- Human rights and labour standards for our supply chain apply to all contractors, suppliers and business partners engaged by H Foster 1875, wherever they operate.

Our Commitments to Our People

H Foster 1875 is committed to:

- The health, safety and welfare of our employees, in accordance with our Health & Safety Policy;
- Proactive recognition and mitigation of health and safety hazards and risks;
- Fairly rewarding our employees for their work, including paying all employees at or above the National Living Wage;
- Respecting employees' right to join or form a trade union and to freedom of association and representation. H Foster 1875 does not currently operate under a collective bargaining agreement, but this right is fully respected;
- Ensuring fair treatment, non-discrimination and equal opportunity for all, regardless of race, gender, sexuality, disability, age, beliefs or background, as set out in our Equal Opportunities Policy and Diversity, Equity and Inclusion Policy;
- Promoting an inclusive and diverse workplace where everyone feels valued and empowered;
- Providing training and development opportunities that enable employees to build their skills and find fulfilment in their work, as set out in our Employee Development Policy;
- Working hours, holidays and leave established in compliance with UK employment law, as set out in individual contracts of employment and our staff handbook;
- Ensuring employees have access to appropriate grievance and remedy mechanisms, as set out in the Disciplinary and Grievance Procedures in our staff handbook, and to whistle-blowing channels as set out in our Whistle-blower Policy and Procedure, so that concerns can be raised and addressed without fear of reprisal;
- Never engaging in any form of forced labour or child labour.

Our Commitments to Human Rights in Our Supply Chain

H Foster 1875 is also committed to:

- Never knowingly trading with suppliers who allow slavery, servitude, forced labour or human trafficking, or who are involved in supply chains where such issues are known or suspected to be present;
- Conducting regular due diligence checks throughout our supply chain to ensure that human rights are upheld by our suppliers;
- Requiring key suppliers to acknowledge and comply with our Supplier Code of Conduct;
- Seeking appropriate supply-chain transparency and traceability where material risks have been identified;
- Assessing human rights issues in our products' country of origin as part of our supplier onboarding and review process;
- Providing channels for suppliers and other stakeholders, as well as employees, to raise concerns or report violations without fear;
- Continuously reviewing and improving our policies and practices to uphold human rights and ethical standards throughout our value chain.

Grievance, Whistle-blowing and Remedy

H Foster 1875 provides employees, suppliers and other stakeholders with channels to raise concerns relating to labour, human rights, modern slavery or other breaches of this policy.

All concerns are taken seriously and investigated appropriately.

H Foster 1875 prohibits retaliation against any individual who raises a genuine concern or reports a suspected breach in good faith.

Where H Foster 1875 identifies that it has caused or contributed to an a human rights or labour issue, we will seek to address the issue and, where appropriate, provide or cooperate with appropriate remedy.

Records of formal employee grievances, human rights concerns and modern slavery reports will be maintained and reviewed as part of our ESG performance management process.

Targets and Key Performance Indicators

To identify, assess and mitigate human rights and labour risks throughout our own operations and value chain, H Foster 1875 has set the following targets:

Focus Area	Target	Key Performance Indicator (KPI)
Supplier Compliance	80% of critical suppliers are aligned with our human rights standard	% of critical and service suppliers audited
Due Diligence	Human rights issues assessed in 100% of our products' country of origin	Annual Supplier Due Diligence checks % of Biennial supplier surveys
Supplier Review	100% of suppliers to undergo AI vendor review annually	% of vendors reviewed annually
Diversity, Equity & Inclusion	100% of employees to receive DEI awareness training	% of trained staff completing training annually
Fair Pay	100% of employees to be paid on or above the National Living Wage	Living Wage Employer accreditation
Employee Well-being	Maintain an employee satisfaction index of at least 80% each year	% employee satisfaction index
Health & Safety	0% reportable health & safety incidents	Accident frequency rate
Regulatory Compliance	Maintain a non-conformity rate of less than 2% across applicable health, safety, employment, environmental and human rights legislation	Nonconformity rate of legal compliance audits
Reported Concerns	Maintain zero reported concerns rate each year	Number of formal employee grievances, human rights concerns and modern slavery reports received

Allocation of Responsibility

Consistent with our Health & Safety Policy, overall and final responsibility for labour and human rights matters at H Foster 1875 Ltd rests with the Managing Directors, who appoint the General Manager as nominee for the day-to-day development, implementation, monitoring and review of this policy.

The General Manager is responsible for:

- Maintaining and updating this policy and proposing objectives and targets;

- Coordinating supplier due diligence and the biennial Labour & Human Rights Materiality Assessment;
- Monitoring relevant labour and human rights KPIs;
- Reporting findings, performance gaps and significant concerns to the Managing Directors.

The Managing Directors are the first point of contact for any employee concerns relating to labour or human rights matters, alongside the grievance and whistle-blowing channels described above.

All employees, contractors and suppliers share responsibility for conducting themselves in line with this policy and for reporting any concerns.

Review

This policy will be reviewed annually by the Managing Directors and the General Manager, or sooner if there is a change in law, business operations, or as part of the annual EcoVadis and Business Management System review cycle. Any amendments and the date they take effect will be communicated to employees under the usual mechanism for company policy updates.

Related Documents

This policy should be read alongside:

- Staff handbook and individual contracts of employment (including Disciplinary and Grievance Procedures)
- Health & Safety Policy
- Equal Opportunities Policy
- Diversity, Equity and Inclusion Policy
- Employee Development Policy
- Whistleblower Policy and Procedure
- Supplier Code of Conduct

Simon & Tom Eggar
Managing Directors, H Foster 1875 Ltd
Date: Sept 2026