FrieslandCampina
nourishing by nature

FrieslandCampina

Global Human Rights policy

To us, as Royal FrieslandCampina N.V. (“FrieslandCampina”), sustainability means to provide good nutrition in balance with people and planet. Respecting human rights is an essential driver to achieve that ambition.

This policy sets out our commitments and approach to human rights. It is part of our code of conduct, Compass.

Scope

This policy applies to FrieslandCampina, FrieslandCampina’s subsidiaries and other legal entities in which FrieslandCampina has management control.

We are committed to respecting human rights

We respect all internationally recognised human rights in our operations and value chain, in line with the United Nations Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct. We are committed to the International Bill of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

We ensure compliance with applicable laws and respect international human rights principles wherever we operate.

We take responsibility towards people who might be affected by our value chain activities (“affected people”), from grass to glass, such as:

- our employees, and anyone working at our company through an agency, a supplier, as an independent consultant or in any other position;
- employees of our business partners;
- local communities; and
- consumers.

We apply an inclusive lens that considers specific impacts on different groups, such as children, contingent workers, indigenous peoples, migrants, smallholder farmers and women.

To prioritise, we have identified the focus areas on which we will take proactive action (see Appendix).

We achieve it by:

Human rights due diligence

We conduct human rights due diligence within the meaning of the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct. We aim to identify and address risks to people that we may cause, contribute to or be directly linked to. The process includes consultation with affected people. If a negative impact is identified, we will take or cooperate in corrective actions.

We use our leverage to address human rights risks. Ending a business relationship is considered a last resort, and that will be subject to an assessment of potential further risks to people. Where applicable, we will support our business partners to implement the due diligence.

More details will be provided in our internal human rights and environmental due diligence principles. Our progress on the human rights due diligence will be publicly reported.

Speak Up

Our employees are encouraged to Speak Up if they have a question or concern, as stated in our Compass.

Our Speak Up webservice is open to all stakeholders to raise human rights concerns related to FrieslandCampina. The channel is operated by an independent third party, available 24/7. It accepts anonymous reports in multiple languages.

For business partners, information about Speak Up is also provided in the Business Practices for Business Partners, as a supplement to our contracts with business partners.

We have a zero tolerance for any form of retaliation or unfair treatment. Our Speak Up process is designed to always protect everyone who may wish to raise a concern.

We see it a joint effort and have the following expectations:

We expect our business partners to respect human rights as set out in this policy. This policy details our human rights expectations as stated in the Business Practices for Business Partners and Responsible Supplier Policy.

We expect our employees to:
- participate in human rights trainings provided,
- join engagement activities as requested,
- Speak Up on human rights questions and concerns, and
- adhere to Compass.

More guidelines will be provided internally.

Governance structure we apply

Our human rights agenda is overseen by the Executive Board and the Chief People Officer at the most senior level.

The social sustainability team, a multidisciplinary team existing of Human Resources, Ethics & Compliance, Procurement, Supply Chain and Corporate Affairs, designs and executes our global human rights program. With the team's support, leadership embeds this policy into functional and business operations, by:

- building human rights awareness,
- engaging with affected people and other relevant stakeholders,
- tailoring the policy and overseeing functional or business-specific human rights matters,
- initiating or joining human rights risk assessment, and
- implementing or cooperating in human rights risk mitigations.

More guidelines will be provided internally.

FrieslandCampina will amend, update, revise or revoke this policy as deemed appropriate.

Appendix

FrieslandCampina focus areas of human rights

Our focus areas of human rights are identified based on the outcomes of our human rights due diligence, Speak Up process, relevant management systems and input from our employees, workers' organisations, business partners, non-governmental organisations, and other stakeholders.

Across the value chain:

We expect our business partners to follow equivalent standards and provide requested information.

1. Non-discrimination, violence and harassment
Together with our internal Workplace Respect Policy and our Global Diversity, Equity & Inclusion Policy, we aim to create a workplace where everybody is treated with respect without discrimination, violence or harassment. We follow relevant definitions in the International Labour Organisation's (ILO) Discrimination (Employment and Occupation) Convention, 1958 (No. 111), the ILO Equal Remuneration Convention, 1951 (No. 100) and the ILO Violence and Harassment Convention, 2019 (No. 190). This means:

- We do not accept discrimination of any kind - such as based on age, ethnic, gender, nationality, race, religion, sexual orientation, social origin or union membership.
- When carrying out human rights due diligence, we consider special needs, such as maternity protection and relocation support.
- We do not tolerate any form of inappropriate behaviour, such as bullying and (sexual) harassment, unfair treatment or retaliation of any kind.

2. Safety and health at work
We are committed to the safety and health of our employees and everyone involved in our business, as stated in our Safety Policy. This means we prevent incidents, ensure access to clean and adequate facilities at work and support (mental) wellbeing. Safety and health is our highest priority and non-negotiable.

3. Environmental impact on people
We recognise the environmental impact on people. Particularly, local communities (including indigenous peoples) can be strongly affected by environmental harms, regarding their access to water and sanitation and rights to the lands and resources. We are reducing the negative environmental impact of our operations and value chain activities, while upholding the respect for human rights. This is supported by our sustainability programmes focusing on climate, nature and circularity.

4. Freedom from child labour
We are committed to the ILO Minimum Age Convention, 1973 (No. 138) and the ILO Worst Forms of Child Labour Convention, 1999 (No. 182). Accordingly, we apply the minimum age for work as fifteen years old[1] and the minimum age for hazardous work (such as overtime work, work with dangerous machinery and exposure to extreme temperatures) as eighteen years old. Meanwhile, we recognise that decent youth employment can benefit the youth's growth.

[1] Except the applicable law defines a lower minimum age as consistent with the Article 5 of the ILO Minimum Age Convention.

5. Freedom from forced labour

We combat forced labour as meant in the ILO Forced Labour Convention, 1930 (No. 29) and the ILO Abolition of Forced Labour Convention, 1957 (No. 105). All work must be conducted on a voluntary basis, and not under threat of any penalty or sanction. We refer to the ILO Indicators of Forced Labour (such as retention of identity documents, restriction of movement, withholding of wages and excessive overtime) to identify, prevent and address forced labour risks.

6. Right to privacy

As stated in our Compass, we are dedicated to protect the privacy and personal data of our consumers, employees, member farmers and business partners. We comply with data protection laws and our own internal guidelines to maintain control over the data we are responsible for. This includes only collecting the data that we need for our reasonable business purposes as well as having transparent and open communication about the data we collect.

7. Living wages

We are committed to providing a living wage for our employees. We strive for a living wage also received by the contingent workers who are externally hired by us and work under the supervision of us. We follow the ILO definition of a living wage, a wage level as necessary to afford a decent living standard for workers and their families.

8. Freedom of association and collective bargaining

We are committed to the ILO Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) and the ILO Right to Organise and Collective Bargaining Convention, 1949 (No. 98). This means:

- We respect the freedom of our employees to establish or associate with any organisation of their own choosing, including a labour union, and to freely choose their representatives without interference such as intimidation, dismissal or harassment.
- We maintain ongoing dialogues with workers' representatives in good faith.
- Where applicable law conflicts with the relevant international standards, we aim to seek parallel means, such as facilitating a good forum for dialogue between employees and leadership or facilitating workers to elect their own workplace representatives.

9. Working time

We are committed to the ILO standards on working time. This means:

- We comply with applicable laws on working time.
- The normal working hours (pre-overtime) will not exceed eight hours per day and forty-eight hours per week, with an exception for shift work.
- The weekly rest period will not be less than consecutive twenty-four hours per seven-day week.
- Overtime will be an exception to meet short-term business demand and will be voluntary.
- We promote work-life balance and flexible working arrangements, as detailed in our internal wellbeing guidelines and way of working guidelines.

Specific to raw material sourcing:

10. Living income

We support living income of smallholder farmers in our supply chain. With our Dairy Development activities, we work together with local dairy farmers, for a more stable and fair market where the farmers can improve their income. For the non-dairy smallholder farmers, we deliver support by cooperating with our suppliers and engaging with industry-wide partnerships.

Specific to our operations:

11. Social security

We recognise the right to social security without discrimination, to ensure access to health care and income security, particularly in cases of invalidity, maternity, old age, sickness, unemployment and work injury. We comply with applicable laws and keep our employees informed about their social benefits coverage.

On the focus areas, we will take proactive action via human rights due diligence which involves engagement with stakeholders (including affected people). We tailor the approach to different geographies and industries. Meanwhile, we recognise the interconnection among human rights and will not ignore any other human rights impacts related to us.

FrieslandCampina keeps the focus areas under review, and will amend, update, revise or revoke this appendix as deemed appropriate.