

## Human Rights Policy

This policy applies to all subsidiaries of Accrol Group Holdings PLC (Accrol Papers Limited – Blackburn, Leyland, and Leicester, John Dale Ltd, and Severn Delta Ltd).

### 1.1 Introduction

Our people are at the heart of our business, and we understand our responsibility to protect and respect human rights across our operations, in accordance with the United Nations Guiding Principles on Business and Human Rights.

We're committed to implementing and enforcing processes and controls that identify, prevent, and mitigate human right risks within our business and across our supply chain, as we believe supporting human rights helps our business grow responsibly.

This Human Rights Policy provides guidance on how we promote ethical practices, to ensure that employees, including those of our suppliers, are treated with mutual respect.

### 2.1 The Guided Principles

According to the UN Guiding Principles on Business and Human Rights, every employer should prioritise three fundamental pillars: protect, respect, and remedy.

As a responsible employer, we're invested in fulfilling our respective obligations and responsibilities to prevent human rights breaches within our business operations and to provide remedies when such breaches occur.

### 2.2 Duty to Protect

At Accrol, we take human rights seriously and we strive to maintain the highest standards in all parts of our operations. Our business impacts thousands of people every day, and while this creates opportunity, we acknowledge that human rights issues and risks can exist. Accrol Group HR Director has overall responsibility for ensuring our commitment to human rights principles.

Recognising our responsibility to protect human rights and prevent concerns from arising allows us to adhere to current international human rights legislation and incorporate human rights considerations into our business practices.

Appropriate measures have been implemented to protect the rights of workers, including their rights to fair wages and safe working conditions. Furthermore, we also implement measures to prevent and mitigate instances of modern slavery which is outlined in our Modern Slavery Policy.

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We establish clear expectations for our company and its subsidiaries to respect human rights in all contexts in which they operate. We engage with our stakeholders and suppliers on the need of incorporating human rights considerations into all parts of business decision-making.

We're committed to maintaining transparency and accountability throughout our supply chain as we work closely with our suppliers to ensure that they uphold human rights standards and comply with our Supplier Code of Conduct / Supplier Terms and Conditions.

We also acknowledge the need of engaging in communication with employees, workers, and other rights holders who could potentially be affected by human rights issues, and we strive to develop a culture of trust and mutual respect for human rights throughout our organisation.

### 2.3 Corporate Responsibility to Respect

We uphold our commitment to respecting human rights by adopting and implementing policies that reflect our dedication in maintaining the rights and dignity of all individuals, both within our organisation and in the communities we operate in.

We promote a culture that has an inclusive environment and celebrates diversity within our organisation. We prohibit discrimination, harassment or bullying of any kind that is based on race, gender, ethnicity, religion, sexual orientation, disability, or any other characteristic protected by law.

We conduct ongoing human rights due diligence to identify, prevent, mitigate, and account for our human rights impacts that may result from our operations, products, services, or supply chains.

This includes regular assessments of our internal procedures and systems, as well as the practices of our suppliers and stakeholders, to ensure alignment with human right standards and we will continuously monitor and evaluate those efforts to respect human rights.

In line with our commitment to transparency, we openly communicate about how we address human rights impacts. This includes engaging with local communities potentially affected by our operations to understand their needs, concerns, and human rights priorities.

Through dialogue and collaboration with key stakeholders, we seek to build strong relationships and ensure that our actions uphold and respect human rights principles.

### 2.4 Access to Remedy

At Accrol, we're dedicated to providing access to effective remedies for individuals, addressing any human rights concerns that may arise, and supporting the well-being of our employees.

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We maintain an open-door policy across all levels of our organisation, fostering open communication and dialogue, which can significantly contribute to resolving issues and can help promote a positive working environment that prioritises colleague well-being.

Employees are encouraged to voice their concerns, seek support, and provide feedback through direct communication channels with their managers, HR, or other designated representatives.

Trained Mental Health First Aiders are located across our sites to offer immediate support and assistance to employees facing challenges. These individuals provide initial support, guidance, and referrals to appropriate resources for ongoing assistance, contributing to a supportive and compassionate workplace culture.

Accrol also offers an Employee Assistance Programme that provides confidential, around-the-clock, third-party advice and support on all matters of health and well-being. Plus, there is a whistleblowing hotline that provides a safe and anonymous avenue to report concerns over any wrongdoings at work, including human rights violations or unethical behaviour without fear of reprisal.

The tools and resources outlined in the policy are integrated into our overall approach to human rights and well-being, ensuring employees have access to effective remedies and support mechanisms. We will regularly review and evaluate the effectiveness of these resources and continuously improve our support systems.

### 3.1 Going Forward

Looking ahead, we remain focused in continuously improving our human rights standards and building a culture of trust, respect, and dignity for all individuals associated with our business. Together, we'll highlight the importance of supporting human rights as an essential component of responsible business practices.

### 3.2 Declaration

This policy is reviewed and endorsed by, Gareth Jenkins, Chief Executive Officer.



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