

Human Rights Policy

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Human Rights Policy

Consistent with our Purpose, Vision and Values, we are committed to respecting human rights, and treating people with dignity and respect.

Our Policy is grounded in the following human rights standards:

- · United Nations Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- · International Labour Organisations Declaration on Fundamental Principles and Rights at Work

This Policy applies to the Glanbia Group, where "Glanbia" or "the Group" is defined as all companies where Glanbia plc directly or indirectly controls more than 50% of the equity or has management control, and others acting on Glanbia's behalf both at Glanbia facilities and Glanbia sponsored events. We also expect our supply chain partners to comply with the principles of this policy.

Our Commitment

Glanbia is committed to upholding international human rights and to acting with integrity in all of our dealings, relationships, and supply chains. We have a zero-tolerance approach to slavery and human trafficking and other human rights infringements. We are deeply committed to respecting and safeguarding the people who work for us and those who are affected by our activities.

We are committed to fully investigate and remedy any adverse human rights impact identified and take all such allegations very seriously.

Key Principles

Glanbia conducts its business in a manner that respects the rights and dignity of all people, complying with all applicable laws and regulations, including those pertaining to human rights, employment and health and safety.

At Glanbia we celebrate individual and cultural diversity and appreciate the richness of experiences and perspectives in a diverse workforce.

We apply the following principles in order to promote a respectful and rewarding workplace, partnering with our supply chain, and supporting the communities where we operate.

Key Principles Continued

Employees and other workers are:

- · provided with a safe working environment.
- · paid fairly and on time for the work they do.
- provided with working hours that comply with national laws and industry standards.
- · (have) the right to freedom of association and collective bargaining.
- not subjected to any form of involuntary servitude or duress, such as having to repay large loans or having their passport retained.
- not discriminated against because of their gender, civil status, family status, sexual orientation, religion, age, disability, race membership of a minority community/group or any other status protected by applicable law.
- not subjected to physical, verbal, sexual, racial, psychological, or any other forms of abuse, bullying or harassment.
- not under the legal minimum age of employment, with a zero tolerance for the exploitation of children.
- provided with fair procedure and absence of discrimination in any grievance, disciplinary or other investigation or resolution process.

If there is a difference between the content of this policy and any local law or regulation, the more stringent requirement will apply.

How to Raise a Concern

For Employees

Employees of Glanbia are required to report any breach of our policies, including any suspected breach of human rights. There are a number of avenues open to an employee in how to raise a concern (Refer to the <u>Code of Conduct Section 2.2 'Who Should I Contact'</u> for details), including use of our independent Speak Up telephone, email or online reporting facility 'Safe Call'.

For Non Employees

Any other person who believes a breach of human rights may have occurred or be occurring within our operations or our supply chain can contact the Safe Call line, details included within the Annex of this policy and also within our Code of Conduct.

Assessment and Due Diligence

To ensure compliance with our policies, we take the following steps to assess and monitor potential risks within our operations and supply chain:

- · Independent audits of our operating sites through the Glanbia Risk Management Process.
- Mitigate against the risk of human rights breaches including slavery and human trafficking by following the Global Procurement Policy requirements and third-party review of supplier analysis.
- Facilitate, without fear of recrimination, our people in reporting any concerns in relation to human rights infringements within the Group operations or supply chain and ensure appropriate oversight and actions are implemented for each incident raised.
- Deployment of appropriate training and communication to our employees to support them in executing their role to ensure Glanbia's commitment to upholding human rights and combatting human rights breaches.

Enforcement

We will ensure fair procedures in any grievance or disciplinary process and uphold the principles set out in this policy.

Violation of this Policy or the refusal to co-operate will result in disciplinary action up to and including termination and referral to the appropriate authorities. We reserve the right to cease relationships with suppliers who infringe this Policy as warranted.

References

This policy reinforces other relevant policies including the Code of Conduct, Supplier Code of Conduct, Diversity Equity and Inclusion policy and supports our Slavery and Human Trafficking Statement, all of which are available on glanbia.com.

For further information regarding human rights, please refer to:

United Nations Universal Declaration of Human Rights

United Nations Guiding Principles on Business and Human Rights

International Labour Organization Declaration on Fundamental Principles and Rights at Work

Annex



Contact Safecall, an Independent Service for Raising Concerns

If you have a concern about a legal or ethical issue and are not comfortable using one of the standard internal methods, you can contact Safecall, an independent service for raising concerns.

You can use the following Freephone numbers:

| Country | Phone Number |
|-----------------------------------|-------------------------------------|
| Australia | 1 800 312928 |
| Belgium | 00 800 72332255 |
| Brazil | 0800 892 1750 |
| Canada | 1877 59 98073 |
| China (Shanghai, Suzhou, Beijing) | 10800 7440605 (China Unicom/Netcom) |
| | 10800 4400682 (China Telecom) |
| Denmark | 00 800 72332255 |
| France | 00 800 72332255 |
| Germany | 00 800 72332255 |
| India | 000 800 4401256 |
| Indonesia | 001 803 440884 |
| Ireland | 1800 812740 |
| Japan | 0120 921067 |
| Jordan | +44 191 516 7756 (Not toll free) |
| Malaysia | 1800 220 054 |
| Mexico | 01800 1231758 |
| Netherlands | 00 800 7233 2255 |
| New Zealand | 00 800 7233 2255 |
| Northern Ireland | 0800 9151571 |
| Norway | 00 800 7233 2255 |
| Philippines | 1800 14410499 |
| Poland | 00 800 72332255 |
| Portugal | 00 800 72332255 |
| Russia | 810 800 72332255 |
| Singapore | 800 4481773 |
| South Africa | 0800 990243 |
| South Korea | 001 800 72332255 (Korea Telecom) |
| | 002 800 72332255 (Dacom) |
| Spain | 00 800 72332255 |
| Sweden | 0850 252 122 |
| Thailand | 001 800 72332255 |
| UAE | 8000 441 3376 |
| United Kingdom | 0800 9151571 |
| Uruguay | 0004 044037 |
| USA | 1 866 901 3295 |
| Vietnam (Mobifone) | 120 020036 |
| Vietnam (VNPT) | 120 11157 |
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