



Human Rights Policy

Scope and Objectives

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. This includes our own workforce¹, along with business partners, other parties directly linked to Glanbia operations, products or services in Glanbia's upstream and downstream value chain and affected stakeholder groups, across geographies.

Our expectation is that our own workforce complies with the principles of this policy, along with our setting out the expected behaviours of our business partners and other parties directly linked to Glanbia operations.

This policy supports Glanbia's commitment to upholding internationally recognised human rights standards and conducting all business activities with integrity and respect. We maintain a zero-tolerance stance toward slavery, human trafficking, and any form of human rights abuse. Our commitment extends to protecting the rights and dignity of all individuals who work within our operations, as well as those impacted by our activities across the value chain. We strive to foster a culture of respect, fairness, and accountability in every aspect of our business.

Implementation

To ensure the effective implementation of this Policy, Glanbia:

- Communicate the Policy across the organisation including, but not limited to, our workforce and appropriate stakeholders. This policy is publicly available on our website glanbia.com in multiple languages.
- Provide training and awareness programmes to appropriate employees on human rights.
- Continuously improve our practices to align with evolving human rights standards and best practices.

Our Commitment

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

Glanbia is committed to upholding international human rights and to acting with integrity in all of our dealings, relationships, and supply chains. We are deeply committed to respecting and safeguarding the people who work for us and those who are affected by our activities.

Our Policy is grounded in the following internationally recognised instruments, frameworks and standards for human rights:

- 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
- OECD Guidelines for Multinational Enterprises

¹The term 'workforce' or 'workers' taken in the context of this policy is to mean all 'employees' and 'other workers' of Glanbia. 'Employees' in the context of this policy consists of all Glanbia employees, directors or officers including any based in wholly owned subsidiaries or in any joint venture or associate operations. 'Other workers' in the context of this policy include independent contractors, consultants, trainees, agency staff, persons on work experience, shareholders, volunteers, prospective employees involved in the recruitment process or contract negotiations, and ex-employees. Where a policy section is relevant to Glanbia 'employees' only, the term 'employee' will be used.

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 value chain, and supporting the communities where we operate.

Our workforce is:

- provided with a safe working environment.
- paid consistently and on time for the work they do.
- provided with working hours that comply with national laws and industry standards.
- entitled to 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, political opinion, nationality, or any other status protected by applicable law.
- not subjected to physical, verbal, sexual, racial, psychological, or any other forms of abuse, discrimination, bullying or harassment.
- not under the legal minimum age of employment, with a zero tolerance for the exploitation of children, refer to Appendix 1.
- 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.

Embedding Human Rights

In addition to this specific Human Rights Policy, Glanbia communicates human rights expectations in other key Group policies such as the Code of Conduct, Supplier Code of Conduct, and Inclusion and Belonging Policy.

We provide biannual Code of Conduct training to our workforce, designed to support responsible business conduct and Glanbia's commitment to upholding human rights. Our most up-to-date Human Rights Policy is also communicated during this training. We continue to build the capacity of our people on modern slavery and human rights generally. This includes working collaboratively with others.

Our Approach – Identification & Assessment

All persons, including suppliers and business partners are required to act consistently with our Code of Conduct when acting on our behalf or in our name. Glanbia is committed to ongoing stakeholder engagement. We also endeavour to carry out appropriate due diligence to understand, identify and assess potential or actual risks to people that we cause or contribute to in our operations, supply chains and in the communities where we operate.

Access to Remedy

Where actual and potential adverse impacts are identified, measures are taken to respond or prevent activities that are causing or contributing to adverse impacts, and to mitigate the impact's effects on people or the environment. Measures are based on the human rights impact assessment and with consideration of relevant information from stakeholders.

Measures taken relating to our workforce include:

- Facilitating, without fear of recrimination, our people in reporting any concerns in relation to human rights infringements within the Group operations or supply chain and ensuring appropriate oversight and actions are implemented for each incident raised.
- Deployment of appropriate training and communication to our workforce as detailed above, to support them in executing their role to ensure Glanbia's commitment to upholding human rights and combating human rights breaches.
- Providing channels to raise concerns to our workforce, including use of our independent Speak Up telephone, email or online reporting facility 'Safe Call'. Glanbia's workforce are required to report any breach of our policies, including any suspected breach of human rights.

Measures taken for our value chain include:

- Mitigating 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.
- Positive engagement with Suppliers around issues regarding human rights.
- Providing suppliers with access to the Supplier Code of Conduct
- Developing corrective action plans for those Suppliers assessed as higher risk.

In addition to the specific measures above any other person who believes a breach of human rights may have occurred or is occurring within our operations or our value chain can contact the Safe Call line, details included within Appendix 2 of this policy and also within our Code of Conduct

Enforcement

We will ensure fair procedures in any grievance or disciplinary process and uphold the principles set out in this policy. We are committed to providing all key stakeholders, including workforce, and suppliers, with access to grievance procedures that ensure concerns are heard and addressed fairly and effectively.

If a member of our workforce is found to be in violation of this policy or refusals to co-operate with this policy it will result in disciplinary action up to and including termination, and referral to the appropriate authorities. In the case of business partners such as suppliers, we reserve the right to cease relationships with those who infringe this policy as warranted.

Communication

Information regarding our commitments to respect Human Rights and our related due diligence process are contained within this Human Rights Policy which is publicly available. Our Sustainability Statement also provides further details on our management of potential and actual impacts and risks.

References

This policy reinforces other relevant policies which are especially relevant for our own workforce, these include: the Code of Conduct; Supplier Code of Conduct; Inclusion and Belonging policy; Environment, Health & Safety policy, Speak Up policy and supports our Modern Slavery Statement, all of which are available on [glanbia.com](https://www.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](#)

[OECD Guidelines for Multinational Enterprises on Responsible Business Conduct | OECD](#)

Appendix 1 Forced & Child Labour Addendum

Introduction

Glanbia has a zero-tolerance policy towards any form of forced labour and child labour. This document reflects Glanbia's commitment to act ethically, respectfully and with integrity concerning human rights and the prevention, mitigation and remediation of violation in any form.

Purpose

This document outlines Glanbia's commitment to take steps to prevent forced and child labour within our own operations and supply chain and acting responsibly in the event such an event is suspected or occurs.

Scope

This document is an addendum to and follows the same scope as our Human Rights policy.

Definitions

Forced Labour: Glanbia utilises ILO definition of "Forced Labour" as "all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily."

Child Labour: ILO defines "Child Labour" as "work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and/or
- interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work."

Key Principles

Glanbia prohibits the use of child labour and forced or compulsory labour within our operations and value chain. No worker is made to work against his/her will or work as bonded/forced labour, or subject to corporal punishment or coercion of any type related to work.

In addition, this document is based on the International Labour Organisation (ILO) Minimum Age Convention no. 138 (1973). According to this convention, the word "Child" is defined as any person below fifteen (15) years of age, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age would apply. If, however, the local minimum working age is set at fourteen (14) years of age in accordance with exceptions for developing countries, the lower age will apply.

This document also incorporates the ILO Convention on the Worst Forms of Child Labour no. 182 (1999). All actions to avoid child labour shall be implemented by taking the child's best interests into account. Glanbia requires that all suppliers shall recognise the U.N. Convention on the Rights of the Child, and that the suppliers comply with all relevant national and international laws, regulations and provisions applicable in the country of production.

Suppliers are obliged to take the appropriate measures to ensure that no forced or child labour occurs at suppliers' and their subcontractors' places of production.

Implementation and communication

This document is publicly available and clearly communicated to all of our workforce and upstream value chain suppliers at ganbia.com. Further internal communication is completed through induction processes.

Internal implementation of the document is the responsibility of local human resources (HR), who do not permit minors to enter our facilities as workers. There is zero tolerance policy towards its breach. Employment contracts and other records, documenting all relevant details of the employees, including age, are maintained and are open to verification by any authorised personnel or relevant statutory body.

Process for remediation when non-compliance with this policy is suspected or detected within our own operations or our upstream value chain In our own operations

Where forced or child labour is suspected or detected in Glanbia's own operations the priority is to remove the potentially affected person from the workplace. Potentially affected persons must be kept safe and always protected from victimisation or further vulnerability. The wellbeing of the potentially affected person is key, including the protection of the economic and social status.

The process to follow in the event of suspected forced or child labour shall include but is not limited to the below actions.

- In the case of suspected child or forced labour, direct confrontation should be avoided initially. Local human resources should verify age and/or other relevant documentation through routine document checks.
- If concerns are confirmed or documents are inconclusive, they are to remove the potentially affected person or suspected underage child from work immediately, ensure their safety, gather contact details, and verify age and/or other relevant documentation through appropriate channels.
- They shall immediately inform the relevant local authorities, the primary caretaker (if relevant) and the Group Secretary with full transparency.
- During all steps, they shall communicate clearly with the person and explore remediation options, taking into account the wishes and needs of the potentially affected person and in line with local laws. This should be accompanied by appropriate forced labour / child labour expertise.

Value chain – suppliers: If forced or child labour is suspected or detected in the supply chains of Glanbia, we will seek to work in partnership with the supplier and appropriately qualified organisations to develop a responsible solution that is in the best long-term interests of the person, in line with the process followed if such an event was suspected in Glanbia's own operations.

Monitoring and audit

Periodic assessment can be conducted as needed, with annual random checks by local HR. These include spot checks on age verification for all new starters, and Right to Work documentation as relevant.

We take responsibility for addressing adverse impacts linked to our activities. Where appropriate, we remediate, prevent recurrence, and improve our practices. We support collaborative efforts that enable access to remedy and commit not to obstruct other legitimate mechanisms.

Appendix 2 Safecall Contact Information

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	4008 833 405
Denmark	00 80 25 41 90
France	00 800 72332255
Germany	00 800 72332255
India	000 800 4401256
Indonesia	001 803 440884
Ireland	1800 812740
Japan	0120 921067
Bangladesh	+44 191 516 7756 (Not toll free)
Malaysia	1800 220 054
Mexico	800 1231758
Netherlands	00 800 7233 2255
New Zealand	00 800 7233 2255
Northern Ireland	0800 915 1571
Norway	00 800 7233 2255
Philippines	2 8 540 2694
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)	121 020036
Vietnam (VNPT)	120 111157
Vietnam (Viettel)	122 80725 122 80725 (Viettel)

