

HUMAN RIGHTS POLICY

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Human Rights Policy

1. Introduction

C&C Group plc is a leading, vertically integrated premium drinks company which manufactures, markets, and distributes branded beer, cider, wine, spirits and soft drinks across the UK and Ireland. The Group is head quartered in Dublin and is listed on the London Stock Exchange.

This Human Rights Policy complements C&C Group's [Code of Conduct](#), which governs the responsible and ethical conduct across the Group. In line with our ESG Strategy of "Delivering to a Better World" we live our Values of "Respecting people and our planet, while bringing joy to life and ensuring quality in everything we do".

C&C is dedicated to upholding the highest standards of human rights. Our Human Rights Policy has been guided by the International Bill of Human Rights and the principles concerning fundamental rights as set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

We believe that all businesses have a responsibility to respect human rights. We accept this responsibility for our colleagues while taking a rigorous approach to minimising our environmental impact. This is in line with our approach to social accountability and responsible sourcing as set out in the Group's Code of Conduct.

Our fundamental principle is to align our actions with legal regulations in every region and country of our operations. In instances where national law and international human rights standards diverge, we will comply with the highest standard. Collaboration with our operations and partners is key in finding avenues to uphold these human rights standards.

Our Human Rights Policy is applicable to all colleagues across C&C Group, and it is our expectation that anyone doing business for or with C&C Group and others acting on C&C Group's behalf will adhere to this policy. It mandates that all colleagues conduct themselves reasonably and lawfully in their interactions with other colleagues, partners, and communities. We require our partners to conduct their operations ethically and with integrity.

C&C Group require colleagues and all other parties to comply with this policy, which can be amended from time to time, but any amendment would not amend the contract of employment.

This policy is approved and overseen by the C&C Executive Committee and will be reviewed on an annual basis.

2. Data Protection

We process your personal data in accordance with our Group Employee Data Privacy Notice, or supplemental 'just in time' privacy information provided to you when required. Your personal data is held securely and only used when there is a legitimate business purpose to do so. Any inappropriate access or disclosure of colleague data should be reported to our Data Protection Officer (DPO) in accordance with the personal data incident reporting process. You can contact our DPO at GDPR@candcgroup.com. It may also constitute a disciplinary offence, which would be dealt with under our Disciplinary Policy.

3. Key Principles of our Human Rights Policy

C&C Group commit to respect and support the dignity, wellbeing and human rights of our colleagues, all parties in our supply chain and the communities in which we operate.

In addressing potential human rights risks within our business, we focus on the following:

Employment is freely chosen:

We categorically reject forced and compulsory labour in any form, including bonded, indentured labour, modern slavery, or human trafficking in our own business or any of our supply chains. There is no forced labour, and all colleagues and workers are free to leave their employment in accordance with their contractual notice terms.

We expect the same high standard and transparency from all our contractors, suppliers and other business partners and we expect that our suppliers will hold their suppliers to the same high standards.

There shall be no discrimination or harassment:

We foster a diverse and inclusive workplace and are committed to promoting equal opportunities.

All applicants, colleagues and workers will be treated fairly and with dignity and respect regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, social class, nationality, ethnic or national origin, religious belief, union membership, political opinion, sex, sexual orientation or any other protected characteristic. This applies to all aspects of employment including selection, promotion, training, appraisals, pay and conditions, conduct at work, disciplinary, capability and grievance procedures and termination of employment.

We believe that everyone has the right to be treated with dignity and respect in an environment free from harassment and bullying.

Child labour shall not be used:

We oppose all forms of child labour, ensuring compliance with legal minimum age requirements across all our markets. C&C sets a minimum working age of 18 (unless employed as part of an apprenticeship scheme where the minimum age will be 16 years, or via school age work experience agreements). Those under 18 strictly adhere to legal standards regarding serving alcohol, working hours, conditions, and any educational or training requirements.

Should a child under the minimum age be found to be working within any of our facilities or supply chain, we will work in accordance with local laws to rectify this.

Our working environments will be safe, and we will be respectful to our planet:

C&C Group's critical focus is on colleague safety, health and wellbeing, aligning with C&C policies, statutory regulations and industry standards. The Group provides a safe working environment to prevent accidents and work-related illnesses.

We will ensure that compensation aligns with local standards, minimum wage legislation and collective bargaining agreements, and that payment is timely and transparent. We are committed to comply with local laws on working hours, overtime, breaks and statutory leave.

We respect our colleagues' right to choose or decline union membership, ensuring freedom from threats. Collective bargaining is recognised and respected in accordance with local laws and these rights will not be restricted or interfered with.

All forms of physical abuse, threat of physical abuse, verbal abuse, violence, sexual or other harassment, bullying or other forms of intimidation are prohibited.

Our commitment to environmental protection is evident via our extensive programmes and adherence to C&C's [environmental policies](#). These demonstrate our respect for the planet as we strive to minimise our environmental impacts across our operations.

We will respect individuals' privacy and confidentiality:

We safeguard personal, customer and supplier data transmission as per C&C's [Data Privacy Notice](#), ensuring compliance with all data protection regulations.

We respect private and family life and adhere to local laws and policies with regards to monitoring colleague email and internet usage, installing CCTV and social media use.

4. Due Diligence and Your Responsibilities

We will not tolerate or condone abuse of human rights within any part of our business or supply chains and will take seriously any allegations that human rights are not fully respected.

All colleagues and related parties are responsible for ensuring they understand and comply with our commitments in relation to Human Rights as set out in this policy and for raising any concerns that they may have.

Recognising our integral role in communities, we engage with stakeholders, including customers and suppliers, to understand and consider their views and expectations on Human Rights.

We have established mechanisms for remedy and grievance, encouraging colleagues to report suspected violations through established channels including via a third party reporting channel. Our partners and third parties can report potential violations of our Human Rights Policy by contacting our HR Advice team at hradvice@candcgroup.ie.

Where infringements are reported, we will promptly investigate and take corrective actions. The consequences, whether civil or criminal, will be determined based on the nature and circumstances of the breach. If a breach of legislation is confirmed, we reserve the right to involve relevant authorities for further action.

5. Health and Wellbeing for our Colleagues

Our main priority will always be the health, safety and wellbeing of our colleagues; recognising the key importance of delivering better safety standards and improving the wellbeing of our colleagues.

There are a number of support services available that can be accessed [here](#).