

GLOBAL SUPPLY CHAIN HUMAN RIGHTS POLICY

This policy applies to all companies in Seasalt Group including Seasalt Limited, trading as Seasalt and Seasalt Cornwall and to all Seasalt Group Companies trading internationally and to all our direct and indirect suppliers. It has been informed by internal and external stakeholders.

Our Commitment

We recognise our responsibility to operate with respect to all human rights and this policy is guided by international human rights principles contained within the UN Guiding Principles on Business and Human Rights; The International Bill of Human Rights; The ILO Declaration on Fundamental Principles and Rights at Work; The ETI Base Code; The Ten (10) Principles of the UN Global Compact; OECD Guidelines for Multinational Enterprises; UN Women's Empowerment Principles and Children's Rights and Business Principles.

We believe that every individual involved in our own operations, and within our global supply chain, deserves fair and ethical treatment. We acknowledge our responsibility to respect and promote human rights in all aspects of our business, including in our products and supplier partnerships, our employees, our customers, and our communities.

Implementation

Our dedicated Compliance and Ethics team conduct Human Rights Due Diligence (HRDD) across our existing global supply chain and when onboarding new suppliers as we seek to establish relationships with business entities who share our core values. Our Human Rights Due Diligence approach is informed by the ETI HRDD framework which is based on multi-stakeholder engagement and collaborative action throughout the processes of:

- Assessing actual and potential risk
- Identifying leverage, responsibility and actions
- Mitigating risk and remediating workers
- Monitoring, reviewing, reporting and improving

We pay particular attention to individuals or groups, such as migrant workers or ethnic minority groups, who may be at greater risk of negative human rights impacts due to vulnerability or marginalisation, and take a gender focused due diligence approach. We are committed to advance diversity and inclusion in our own operations, and we encourage our supplier partners to provide safe, fair and equal working conditions.

We expect our suppliers to uphold local and international labour laws as well as the ETI Base Code*, to be proactive and transparent in raising issues and to work collaboratively in resolving any issues that arise.

* Where the provisions of law and the ETI Base Code address the same subject, suppliers should apply the provision that affords the greater protection.

Due to the nature of our business, we focus on labour rights within the global supply chain, and we work together with our supplier partners to prevent, mitigate and remedy any issues. Examples of key human rights-related areas include Freedom of Association; Discrimination; Forced, bonded and child labour; Working conditions, including health & safety and working hours; Fair wages; Equality and inclusion. All salient risks are registered on our Business Risk Register that is reviewed quarterly at the most senior level and annually with external stakeholders to assess ongoing relevance and to prioritise effort and engagement. Some human rights issues can be systemic, and we work closely within the ETI tripartite membership to share knowledge, collaborate and seek solutions.

As full members of the Ethical Trade Initiative (ETI), and an equal opportunity employer, we are fully committed to supporting our supply chain in best ethical industry practice for all those involved in the manufacture of our products. Upholding human rights and ensuring all workers can work freely with respect regardless of their race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Such discrimination will not be tolerated. Since we were founded in 1981, ethical trade and our commitment to doing business responsibly has been and always is at the core of what we do, to make the best choices for people and environment. Our historical commitment to the ETI Base Code has informed our work and is integral to our business model.

Membership of the ETI tripartite of Companies, NGOs and Trade Unions, allows us to collaborate and address priority human rights issues; to share knowledge and best practice; to work together on crisis management (for example, during the Covid-19 pandemic and following the earthquakes in Turkey, February 2023) and to receive support through workshops, discussions, the ETI community, networking events and the online members only platform.

Seasalt is also part of a Small Brands Working Group, set up as a result of the challenges faced by smaller retailers during the pandemic. The group meets regularly and openly discuss key topics and share resources, knowledge, practice and intelligence. It also allows us to identify where leverage can be gained through opportunities to collaborate.

We are active members of several multi-stakeholder initiatives, including the Ethical Trading Initiative (ETI), SEDEX, and the British Retail Consortium and and a signatory of the call to action on human rights abuses in the Xinjiang Uyghur Autonomous Region. We are committed to working with and encouraging our supply chain partners to uphold the principles in this policy and to adopt similar policies within their own businesses and with their own stakeholders.

THE UNIVERSAL DECLARATION OF HUMAN RIGHTS									
1.	Born free and equal in dignity and with rights	2.	No discrimination	3.	Life, liberty and security of person	4.	No slavery or servitude	5.	No torture or cruel, inhuman or degrading treatment
6.	Treated as a person in the eyes of the law	7.	Equality before the law	8.	Remedy by a competent tribunal	9.	No arbitrary arrest, detention or exile	10.	Fair public hearing
11.	Innocent until proven guilty	12.	No interference with privacy, family or home	13.	Freedom of movement within and across countries	14.	Seek asylum from persecution	15.	Have a nationality
16.	Marriage and to raise a family	17.	Own property	18.	Freedom of belief and religion	19.	Freedom of opinion and expression	20	Freedom of peaceful assembly and association
21.	Take part in government of your country	22.	Social security	23.	Desirable work, equal pay and join trade unions	24.	Rest and leisure	25.	Adequate standard of living
26.	Education	27.	Participate in cultural life of community	28.	Social and international order	29.	Protect others' rights and freedoms	30.	Freedom from interference in these rights

Reproduced with permission from the ETI: Human Rights Essential Course training resource.

We understand that we are only as good as the people we work with and we are committed to long term relationships, candid and open communication, supportive resolution and trust. By working closely together, we can implement best practice due diligence, identify potential risk and ensure the wellbeing and respect of all human rights for all workers involved in the manufacture of Seasalt product.

Signed by:

Paul Hayes

Chief Executive Officer

Signed: 31st January 2024 Review date: January 2026

Resources and Links

- 1. <u>United Nations Guiding Principles on Business and Human Rights</u>. Commonly known as the "UNGP's", these guiding principles apply to all business enterprises regardless of their size, sector, location, ownership, and structure.
- 2. Human Rights Essential Course training resource: <u>Universal Declaration of Human Rights.</u>
- 3. The International Bill of Human Rights comprising the Universal Declaration of Human Rights (UDHR), The International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights, is a milestone document in the history of human rights. Drafted in 1948, representatives of different legal and cultural backgrounds from across the globe agreed on a set of fundamental human rights to be universally protected.
- 4. <u>ILO Declaration on Fundamental Principles and Rights at Work</u> is an expression of commitment by governments, employers, and workers organisations to uphold basic human values that are vital to our social and economic lives. They affirm the obligations and commitments that are inherent in membership of the ILO, namely the core labour standards:
- a. Freedom of Association and the effective recognition of the right to collective bargaining;
- b. The elimination of all forms of forced or compulsory labour;
- c. The effective abolition of child labour;
- d. The elimination of discrimination in respect of employment and occupation; and,
- e. A safe and healthy working environment
- 4. <u>ETI Base Code</u> Founded on the conventions of the International Labour Organisation (ILO) and an internationally recognised code of labour practice.
- 5. <u>UN Global Compact</u> All 192 Governments of the United Nations have endorsed the UN Global Compact and its ten principles, including its human rights and labour principles. By incorporating the Principles into your strategies, polices and procedures and establishing a culture of integrity, you are upholding your basic responsibilities to people and planet.
- 6. <u>OECD Guidelines for Multinational Enterprises</u> are recommendations addressed by governments, to encourage positive contributions business enterprises can make to economic, environmental and social progress, and to minimise adverse impact associated with your operations, products and services.
- 7. <u>UN Women's Empowerment Principles.</u> The Principles are the result of a collaboration between the UN Global Compact and UN Women and emphasise the business case for corporate action to promote gender equality and women's empowerment.
- 8. <u>Children's Rights and Business Principles.</u> Developed by UNICEF, the UN Global Compact and Save the Children, the Principles are the first comprehensive set of principles to guide companies on the full range of actions they can take in the workplace, marketplace, and community to respect and support children's rights.