

Human Rights Policy

Mackle Petfoods – Human Rights Policy

1. Introduction

For over 50 years, Mackle Petfoods has built its reputation as a caring, responsible, and people-focused business. Our commitment to human rights is rooted in our core values — **Caring, Quality, Integrity, Innovation, and Sustainability**. These values guide how we treat our colleagues, support our communities, and operate responsibly across our business and supply chain.

We are committed to respecting and promoting the human rights of everyone who works for us, with us, or may be impacted by our operations. Our approach is grounded in dignity, fairness, ethical conduct, and a strong belief in doing what is right. We integrate these principles into our day-to-day operations and into the relationships we build with employees, suppliers, customers, and partners.

This policy applies to the public, employees, contractors, suppliers, and communities associated with **John Mackle (Moy) Ltd T/A Mackle Petfoods**.

Our approach is informed by:

- The Ethical Trading Initiative (ETI) Base Code
- The principles of the UN Guiding Principles on Business and Human Rights
- ILO Core Conventions
- The Human Rights Act 1998
- The UK Modern Slavery Act 2015
- SEDEX / SMETA ethical standards

2. Our Human Rights Commitments

2.1 Employment Is Freely Chosen

1. There is no forced, bonded, compulsory, or involuntary prison labour.
2. Employment relationships are voluntary and based on mutual consent, without threat or penalty.
3. Workers are not required to lodge deposits or identity documents and are free to leave with reasonable notice.
4. The retention of passports or identity documents by Mackle Petfoods or our suppliers is strictly prohibited. No worker shall be threatened with denunciation.

2.2 Freedom of Association & Collective Bargaining

1. Workers have the right to form, join, or assist trade unions and to engage in collective bargaining.
2. The employer adopts an open attitude towards union activities and respects union constitutions and rules.

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3. Worker representatives shall not be discriminated against or punished for exercising these rights.
4. We negotiate in good faith with established workers' organisations or selected representatives.
5. Where the law restricts freedom of association, we support independent worker representation.
6. Collective agreements are implemented where they exist.

2.3 Safe & Hygienic Working Conditions

1. A safe and hygienic workplace is provided, with risks minimised so far as reasonably practicable.
2. Workers receive regular and recorded health and safety training.
3. Clean toilet facilities, potable water, and appropriate food storage facilities are provided.
4. Accommodation, where provided, is clean, safe, and meets basic needs.
5. Responsibility for health and safety is assigned to a senior manager.

2.4 Child Labour Shall Not Be Used

1. There is no recruitment of child labour.
2. Any child found working shall be transitioned into appropriate education or support in line with ILO standards and in accordance with Mackle Petfoods' Child Labour Remediation and Young Worker Policy.
3. No workers under the age of 18 shall work at night or in hazardous conditions.
4. All policies and procedures conform to relevant ILO standards.

2.5 Living Wages Are Paid

1. Wages meet or exceed national legal standards or industry benchmarks.
2. Employment conditions relating to wages are clearly provided in writing.
3. No disciplinary deductions or unlawful wage deductions are permitted.
4. There is no withholding of wages, deposits, or employment fees.

2.6 Working Hours Are Not Excessive

1. Working hours comply with national law and industry standards.
2. Workers shall not regularly be required to work in excess of 48 hours per week.

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3. Workers receive at least one day off in every seven-day period on average.
4. Overtime is voluntary, limited, and paid at a premium rate.

2.7 No Discrimination

1. There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement.
2. Protected characteristics include race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation.

2.8 Regular Employment Is Provided

1. Work is based on recognised employment relationships in line with national law.
2. Employment obligations shall not be avoided through labour-only contracting, excessive use of fixed-term contracts, or inappropriate apprenticeship or home-working arrangements.

2.9 No Harsh or Inhumane Treatment

1. Physical abuse, threats, sexual harassment, verbal abuse, and intimidation are strictly prohibited.

3. Responsible Sourcing

Mackle Petfoods is committed to responsible sourcing and expects all suppliers and business partners to uphold the same human rights and ethical standards that we apply within our own operations.

Suppliers are expected to:

- Comply with this Human Rights Policy and our Supplier Code of Conduct
- Align with the principles of the Ethical Trading Initiative (ETI) Base Code, demonstrating responsible labour practices appropriate to their operations
- Demonstrate zero tolerance for forced labour, bonded labour, child labour, or human trafficking
- Provide safe, healthy, and hygienic working conditions, and ensure fair and lawful pay and working hours
- Apply these standards throughout their own supply chains, including subcontractors and labour providers
- Operate a risk-based approach to human rights due diligence, particularly where sourcing from new locations or higher-risk countries

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- Cooperate fully with audits, site visits, assessments, and corrective action plans, including SEDEX / SMETA audits where required
- Suppliers are expected to participate in responsible remediation processes where issues are identified, and to work collaboratively with Mackle Petfoods to address root causes and prevent recurrence.

Where increased human rights risks are identified, Mackle Petfoods may require enhanced due diligence, proportionate to the level of risk.

Failure to meet these requirements may result in corrective action, suspension, or termination of the business relationship.

4. Reporting Concerns

Mackle Petfoods provides confidential reporting channels for concerns relating to:

- Human rights violations
- Forced or child labour
- Modern slavery risks
- Unsafe working conditions
- Harassment or discrimination
- Wellbeing concerns

All concerns raised will be taken seriously and, where appropriate, investigated in line with our internal procedures. Where human rights issues are identified, appropriate corrective action and remediation measures will be implemented.

5. Responsibility

- **Human Resources (HR):** Responsible for administering and monitoring this policy and ensuring employees can raise concerns.
- **Directors:** Responsible for supporting and ensuring compliance with this policy.
- **Line Managers:** Responsible for ensuring employees are aware of the policy and understand how to report concerns.
- **Employees:** Responsible for complying with this policy and acting in a professional, consistent, and equitable manner at all times.

6. Related Policies & Remediation

This policy forms part of Mackle Petfoods' broader human rights and ethical trade framework and should be read in conjunction with:

- Modern Slavery Statement

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- Supplier Code of Conduct
- Child Labour Remediation and Young Worker Policy

Mackle Petfoods is committed not only to identifying and preventing human rights risks, but also to addressing them responsibly where they occur.

Where issues such as child labour, forced labour, or other human rights concerns are identified, we follow a structured remediation approach. This prioritises the safety, wellbeing, and best interests of affected individuals.

Detailed remediation procedures are outlined within the Child Labour Remediation and Young Worker Policy.

7. Continuous Improvement

We regularly review this policy to ensure alignment with legislation, retailer expectations, ethical best practice, and employee feedback.