

## **1. Our Commitment**

- 1.1. Distell's commitment to human rights is rooted in our core values of collaborating with integrity, honesty and respect. We strive to honour the inherent dignity of all who work for and with us, and are committed to respecting the Universal Declaration of Human Rights in its entirety and throughout our operations.
- 1.2. Distell's Human Rights Policy outlines those human rights principles that we commit to as the bedrock of our operations, alongside the monitoring and remedial systems we have in place to ensure that we adhere to the broad spectrum of rights. Informed by the UN Guiding Principles on Business and Human Rights, we work within the framework of the International Bill of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact, to which we are a signatory. We also have firm commitments to the Sustainable Development Goals; aiming to make positive change in the communities in which we operate, with the wellbeing and dignity of people and planet at the heart of what we do.
- 1.3. Wherever in the world we operate, Distell upholds the highest standards. This means that we defer to international best practice in relation to business and human rights, even in challenging regulatory environments. We acknowledge and support the important work undertaken by human rights defenders around the world, and do not tolerate intimidation or persecution of those individuals and communities expressing their human rights in relation to freedom of speech, association and the right to assembly.
- 1.4. This policy builds on the Distell Code of Conduct and Supplier Code of Conduct, alongside our commitment to responsible sourcing, as we work as a business and with our partners to adhere to and champion human rights across our operations and supply chain.

## **2. Distell's Core Human Rights Principles**

### **2.1. Principle One: No Harassment & Discrimination**

Distell takes a zero tolerance approach to Harassment & Discrimination. With regards to employment status and treatment, no Distell worker or partner will be discriminated against due to factors such as race, religion, colour, ethnicity, national origin, disability, sexual orientation, gender, gender identity, gender expression, marital status or other arbitrary means. We place diversity at the heart of what we do and we build a work environment and company culture that celebrates tolerance and difference. Our priority is the safety and wellbeing of our employees, and we work together to identify and eliminate harassment in all its forms. You can find more information in our Sexual Harassment Policy as well as our Corrective Action Code and Grievance Procedure.

### **2.2. Principle Two: No Forced Labour & Modern Slavery**

We do not permit any form of forced labour, debt bondage or prison labour within our operations and supply chain. Work must always be freely chosen and employees fairly remunerated. We also commit to upholding due diligence of employment agencies, recognising that individuals should never pay to work. Distell is committed to upholding the UK Modern Slavery Act, and undertakes yearly reporting on how we address the risk of modern slavery

within our business and supply chain. Our modern slavery statements are publically available on the Distell website.

### **2.3. Principle Three: No Child & Youth Labour**

We respect the rights of young people as stated in the UN Convention on the Rights of the Child, whereby all children have the right to an education, play and to have their basic needs met. To this end, Distell operates as a business that prohibits all forms of child labour and exploitation. In line with international standards, Distell upholds the ILO's Minimum Age Convention 138 across our operations and supply chain. Distell only employs those who are 18 years old and above, and in all cases take reasonable steps to verify the age of workers upon employment. Distell aims to be an employer where young adults can envision a meaningful career, and as such fosters the safe working environment and adequate training required to build youth skills and livelihoods.

### **2.4. Principle Four: Workplace Health & Safety**

We are committed to the highest standards of health and safety throughout our operations and supply chain. This means that we prioritise the health and wellbeing of our workers and their families, our communities, our suppliers and business partners. We work within a framework of zero harm, and strive to mitigate and remedy risk wherever we find it. We commit to providing appropriate protective equipment, training and agreed procedures that meet health and safety risks across the business, as well as to take into consideration the specific needs of different facilities and job functions. We also recognise that to meet these high standards, Distell commits the necessary financial and human resources, as well as to listen to the needs and expertise of our workforce around workplace health and safety. Distell's approach is outlined in further detail in our [Health, Safety & Environment Management Policy](#).

### **2.5. Principle Five: Decent Wages & Standard of Living**

Our workforce is at the heart of what we do, and we recognise the skills and expertise of our people with competitive remuneration and benefits packages. Work should always allow employees to earn decent livelihoods, where the basic needs of workers and their families are met. (Distell takes this responsibility as an employer seriously, complying with local minimum wage laws where they exist, and with industry market practice where there is no or insufficient minimum wage legislation. We also recognise that a decent take-home wage should be earned within core working hours and allow for a sustainable work-life balance. We believe that a healthy workforce has entitlement to breaks during work hours, paid leave, and working hours within the legal limit and local overtime regulations.

### **2.6. Principle Six: Access to Water & Sanitation**

Distell recognises the link between worker health and access to clean water and sanitation facilities as a basic human right. Acknowledging and providing for the inherent dignity and basic needs of our workforce is vital to wellbeing, and we work with our facilities, and those of our suppliers, to ensure safe and easily accessible access to clean water, sanitation and hygiene.

### **2.7. Principle Seven: Environment**

As a custodian of the land on which our facilities operate, Distell monitors and takes measures to mitigate the impact of our business activities on the environment. We comply with all applicable local laws regarding the environment, use of resources and waste disposal. We believe that protection of the environment is a collective responsibility, involving all elements of our business, as well as engagement with local communities to ensure that our operations do not negatively impact on their livelihoods and human rights. Distell's approach is outlined in further detail in our [Health, Safety & Environment Management Policy](#).

### **2.8. Principle Eight: Land Rights**

Wherever we operate, Distell complies with all local legislation regarding land rights and natural resources, as well as sensitivity in respect to local communities. We conduct due diligence in relation to land rights and impact when developing new business opportunities, securing partners, and land acquisition for our own operations and activities.

## **2.9. Principle Nine: Freedom of Association**

Distell endorses the principle of Freedom of Association and recognises that workers are better able to monitor and uphold their human rights in the workplace when they are free to form and join trade unions, and collectively bargain for their mutual interests without fear of intimidation. Distell seeks to develop social dialogue and productive working relationships with representative trade unions and worker representatives through collective bargaining agreements and worker committee structures to foster information, consultation and negotiation. Where local legislation restricts the right to freedom of association and collective bargaining, Distell will develop alternative mechanisms for meaningful workplace communication and consultation. Distell has a zero tolerance policy throughout its supply chain regarding harassment or discrimination of workers based on their membership, or not, of trade unions and other worker forums, and does not tolerate intimidation of worker representatives.

## **2.10. Principle Ten: Community Engagement**

Looking after our health, safety and environment is our collective responsibility, and as such Distell recognises the value of meaningful engagement with stakeholders at a local and global level. We strive to work with local communities, suppliers, civil society, media and government institutions at all levels on issues that have an impact upon them, or in which they have expertise, in order to inform our approach to human rights. The nature of our business means that our employees and their families are often living in close proximity to Distell operations, and we work together to ensure that communities are listened to and supported by our business.

## **3. Implementation & Monitoring of Distell's Human Rights Policy**

- 3.1. Operational accountability for day to day implementation and monitoring of Distell's Human Rights obligations cuts across all of our departments, and we make sure to provide personnel with relevant training on this issue. Ultimate responsibility for our Human Rights Policy lies with Distell's Sustainability Council. We also commit to making the Policy available to employees throughout our operations and in accessible formats, and providing further training needs around human rights as identified by managers, workers and their representatives.
- 3.2. Distell undertakes risk assessments at a global and local level, and is committed to human rights due diligence throughout its operations and supply chain. Alongside internal monitoring and grievance mechanisms, third party audits are undertaken and corrective actions identified and addressed.

## **4. Reducing Human Rights Risk Across Distell's Supply Chain**

Distell works within a framework of responsible sourcing and integrates human rights compliance within its procurement and awarding processes, and as an integral element of supplier relationship development. In order to do business with us, our suppliers are required to commit to adherence to Distell's Human Rights Policy in its entirety, and communicate the Policy to its workforce and own supply chain. Human Rights are further monitored through regular external audits, which are conducted throughout Distell's supply chain.

## **5. Reporting Ethical and Human Rights Risk**

Whilst we strive through our policies and procedures to identify breaches of human rights throughout our supply chain, we also rely on our managers, employees, business partners and other stakeholders to bring to our attention evidence of human rights risk or infringement. We

foster a culture of safety and empowerment around speaking up against human rights abuse, and cascade our Whistleblowing Policy throughout our operations and those of our suppliers. Distell has a dedicated website, email address and phone number to report ethical and human rights breaches, and our full Whistleblowing Policy can be found on our website.

### **Distell's Ethics & Whistleblowing Lines**

Email: [distell@ethics-line.com](mailto:distell@ethics-line.com)

United Kingdom (Toll Free): 080 189 1196

South Africa (Toll Free): 0800 004 822

Namibia Landline (Toll Free): 0800 003 313

Namibia MTC (Toll Free): 081 91847

International: +27 31 571 5657

Angola: 244 941 022 880 Kenya (Toll Free): 0800 722 626.

Singapore: +65-31635395 Taiwan: 00801-13-6885 China: 40088001496

Toll Free numbers are accessible from fixed lines, mobile rates may apply

## **6. Reviewing Distell's Human Rights Policy**

The Distell Human Rights Policy has been developed with input from teams across the business, and with the engagement of human rights experts. Human Rights reporting is also undertaken at board level, with whom ultimate responsibility for human rights compliance lies. This Human Rights Policy has been approved by the Distell Executive Committee and will be reviewed every two years, and where necessary on an ad hoc basis to meet emerging areas of best practice or risk.

## **7. Who to contact**

Enquiries regarding Distell's Human Rights Policy can be directed to the Sustainability Team at Distell Headquarters in Stellenbosch, South Africa at [info@distell.co.za](mailto:info@distell.co.za)