

Human Rights Policy

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Document owner:	Peter Howells, Technical Director
Approved by:	Peter Howells, Technical Director

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Applies to:	Positive ID Labelling Ltd and its supply chain

1. Purpose and Scope

Positive ID Labelling Ltd is committed to respecting and upholding human rights in all aspects of our business. We recognise that businesses have a responsibility to respect the human rights of the people they employ, the communities in which they operate, and the workers throughout their supply chains.

This policy is informed by internationally recognised frameworks, including the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the core conventions of the International Labour Organization (ILO). It applies to our employees, our supply chain partners, and any third parties acting on our behalf.

2. Our Commitment

We commit to the following human rights principles in the conduct of our business.

Dignity and respect

Every person connected with our business – whether employee, contractor, or supply chain worker – is entitled to be treated with dignity and respect. We do not tolerate harassment, bullying, intimidation, or any form of treatment that demeans or humiliates individuals.

Freedom from discrimination

We oppose all forms of discrimination based on age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation. Our employment decisions, supplier relationships, and customer service are conducted on the basis of merit and legitimate business criteria only.

Fair and safe working conditions

We are committed to providing safe, healthy, and fair working conditions for all our employees. We comply with all applicable employment law in the UK, including provisions relating to minimum wage, working hours, health and safety, and the right to rest and leave. We expect equivalent standards from the suppliers with whom we work.

Freedom of association

We respect the right of workers to freedom of association and collective bargaining, both within our own organisation and within our supply chain, in accordance with applicable law. We do not penalise individuals for legitimate exercise of these rights.

No forced or compulsory labour

We do not engage in or support the use of forced, bonded, trafficked, or compulsory labour in any form. All work carried out in connection with our business must be freely chosen, and workers must be free to leave employment without penalty after giving reasonable notice. This commitment extends throughout our supply chain. For further detail, see our Modern Slavery Policy.

No child labour

We do not employ individuals below the UK minimum school leaving age and do not knowingly engage suppliers who use child labour. Where young workers are employed lawfully in our supply chain, we expect those workers to be protected from work that is hazardous, harmful to their development, or inconsistent with their educational needs.

Privacy

We respect the privacy of our employees, customers, and suppliers, and handle personal data responsibly in accordance with applicable data protection law, including the UK General Data Protection Regulation.

3. Supply Chain Responsibility

We recognise that the greatest human rights risks may lie not within our own operations, but within our supply chain. We take the following steps to identify and address those risks:

- Communicating our human rights expectations to suppliers as part of our procurement process.
- Asking suppliers to confirm their own human rights commitments and those of their key sub-suppliers.
- Giving preference to suppliers who can demonstrate active human rights due diligence.
- Raising concerns directly with suppliers where we identify potential human rights issues.
- Escalating serious or persistent concerns to senior management and, where appropriate, exiting supplier relationships that are inconsistent with our values.

4. Grievance and Remedy

We are committed to providing accessible and effective remedy where we have caused or contributed to human rights harm. Our Grievance Policy sets out the process for raising concerns, which is open to employees, supply chain workers, and any individual affected by our business activities.

We will not retaliate against anyone who raises a human rights concern in good faith. All concerns will be investigated promptly, treated with confidentiality where possible, and responded to clearly.

5. Governance and Review

Responsibility for this policy rests with the Technical Director, who reports to the company directors. Human rights performance is reviewed as part of our annual management review process. This policy is reviewed annually and updated as required to reflect changes in our business, our supply chain, or the applicable legal and international framework.

We are committed to transparency about our human rights performance and will communicate material updates to our employees, suppliers, and customers as appropriate.

Peter Howells

Technical Director, Positive ID Labelling Ltd

Date: April 2026