

McCain Foods Limited

Global Human Rights Policy.



Introduction and Scope.

As a leading producer of prepared potato and appetizer products, and a family-owned company, McCain Foods Limited and its subsidiaries globally ("McCain", "we", or "our") hold our commitment to respecting human rights at the core of our operations and values. We put people at the heart of everything we do and recognize our responsibility to respect the human rights of our employees, workers in the supply chain, and people in the communities in which we operate.

This policy outlines our commitment to respect human rights and the principles that guide our actions as we work to prevent, mitigate or enable the remediation of any adverse human rights impacts we cause or to which we contribute. It applies across McCain and to all our employees.

We are committed to following both local laws and the various human rights standards listed in this policy. Where local law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will seek to honour international human rights principles while staying legally compliant.

Principles and Commitments.

1. Respect for Human Rights

We are committed to respecting the dignity, rights, and freedoms of all individuals. Our actions are guided by the *Universal Declaration of Human Rights* and the principles outlined in the *United Nations Guiding Principles on Business and Human Rights*, as well as the *International Bill of Rights* and the core labour standards set out by the International Labour Organisation (ILO), including the ILO's *Declaration on the Fundamental Principles and Rights at Work*.

2. Safe and Healthy Workplace

We are committed to providing a safe, clean and healthy work environment for all our employees. We comply with all applicable health and safety laws and regulations, as well as apply additional practices that aim to prevent workplace accidents and injuries.

3. Voluntary Employment and Recruitment

We uphold fair labour practices in employment and ensure our recruitment processes are transparent. We strictly prohibit any form of forced labour, bonded labour, indentured labour, involuntary prison labour, child labour and human trafficking in any form.

4. Wages, Benefits and Work Hours

McCain is committed to being a fair wage employer and to providing working conditions and benefits in accordance with the principles of this policy, including maintaining reasonable working hours and rest periods and adhering to all applicable laws.

5. Freedom of Association and Collective Bargaining

We respect our employees' right to join, form or not to join a labor union (where permitted by law) without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. We are committed to bargaining in good faith with such representatives. We are also committed to open and constructive dialogue with employees who are not represented by a trade union.

6. Non-Discrimination and Harassment-Free Workplace

We are committed to maintaining an inclusive workplace free from discrimination and harassment, in which we welcome and value all people. We strive to ensure that all employees and business partners are treated with respect and dignity, and we do not tolerate any form of harassment, bullying, or discrimination.

Implementation and Governance.

7. Monitoring

We undergo targeted internal and external audits to ensure a fair assessment of our practices. We take steps to respond appropriately and address adverse impacts arising directly or indirectly through our own activities or our business relationships that are brought to our attention.

8. Raising concerns

We encourage all stakeholders to raise concerns or complaints related to human rights matters or violations without fear of retaliation. We have established several ways for employees, suppliers, business partners and other stakeholders to report, including options for reporting anonymously. These include reporting potential misconduct to managers, Human Resources professionals, and the Legal & Compliance team, as well as local-call helplines and a web-based reporting tool. All complaints received through any of these mechanisms are investigated promptly and appropriate corrective actions are taken. The web-based reporting form and helplines are independently operated by a third party to ensure anonymity when requested. The web-based reporting tool is available here: <https://mccain.ethicspoint.com/>

9. Expectations of Suppliers

All of McCain's suppliers are required to comply with our Supplier Code of Conduct, which sets out our standards of ethical conduct. In the event of any breach of the Supplier Code of Conduct, the supplier is expected to implement corrective actions immediately. McCain reserves the right to terminate any agreement with any supplier in the event of noncompliance with the Supplier Code of Conduct.

10. Communication and Awareness

We actively communicate the expectations outlined in this policy to employees, suppliers, business partners and other relevant stakeholders through disclosure, engagement and/or training.

All McCain employees are required to complete annual mandatory training on our Code of Conduct. This training includes, among other things, the expectations set out in our Code of Conduct regarding respectful behaviour and our values and commitment to lawful conduct.

11. Governance and Oversight

The Board of Directors of McCain Foods Limited is responsible for McCain's strategy, organization, and oversight, including on matters related to human rights. The Global Senior Leadership Team is responsible for the execution of our approach and has set out clear roles and responsibilities to ensure coordinated implementation of our Human Rights Policy. Our Human Rights Working Group and Strong Foundations Steering Committee oversees the implementation of this policy, monitors our progress, and its members report to the Board of Directors and various Board committees as appropriate on an *ad hoc* basis.

12. Ownership and Review

This Policy is owned by the Chief Human Resources Officer and the Chief Procurement Officer, in consultation with the VP Global External Affairs and Sustainability and the Chief Legal Officer. This policy will be reviewed on a periodic basis and updated as necessary to reflect changes in our operations and the evolving global human rights landscape.

Conclusion.

At McCain, respecting human rights is fundamental to our values and we are dedicated to upholding the principles outlined in this policy to avoid infringing on the human rights of others and addressing any actual or potential adverse impacts on human rights with which we are involved.

We recognize that this policy requires an ongoing effort and collaboration with our stakeholders across our value chain. We commit to engaging with employees, suppliers, and local communities to gain further insights into risk areas and undertake any remediation actions as needed.

For any questions or further information regarding this policy, please contact the Global Legal & Compliance Department through the ethics helpline (<https://mccain.ethicspoint.com/>).