

Group Guiding Principles: Employee Wellbeing

Camellia Plc ("**Camellia**") is the ultimate holding company of a group of companies incorporated in various jurisdictions (the "**Group**"). Within the Group, Camellia has indirect interests in several entities which have responsibility for managing primarily agricultural operations, including responsibility for managing the assets and workers associated with those operations (the "**Operating Companies**"). The Operating Companies are predominantly based in Bangladesh, Brazil, India, Kenya, Malawi, South Africa, Tanzania and the UK. The majority of the Group's turnover is derived from the Operating Companies' work in the agricultural sector through the growing of tea, avocado, macadamia, rubber, blueberries, arable crops, forestry and livestock.

Governance and Strategy

The Operating Companies possess the specialist knowledge, experience and expertise in relation to their own operations. It is the Operating Companies which best understand their own agricultural crops and livestock, the local geographical and climatic conditions, the local legal and regulatory framework with which they must comply and the local socio-political context in which they operate. Camellia is not an Operating Company and does not claim to possess such specialist local knowledge, experience or expertise. Having regard to this reality, Camellia's business philosophy is based on an approach which promotes a high degree of operational autonomy enjoyed by the Operating Companies.

Camellia expects the Operating Companies to adopt, comply with, and promote appropriately high standards in respect of their operations. Following engagement with the Operating Companies as to their existing practices and procedures and in line with Camellia's understanding of international guidelines, Camellia has formulated a series of 'Group Guiding Principles' ("**GGPs**") which outline the principles and commitments that Camellia expects the Operating Companies to adopt and adhere to in key areas such as human rights, modern slavery, financial crime, environment, quality, certification and traceability, employee wellbeing, health and safety and whistleblowing. Importantly, the GGPs set out the principles which Camellia expects Operating Companies to comply with at a minimum, subject to any local laws which would make it unlawful for the Operating Companies to do so, in which case Camellia expects the Operating Companies to respect and adhere to these principles to the greatest extent legally permissible. For the avoidance of doubt, nothing in the GGPs prevents an Operating Company from adopting a higher standard, whether in accordance with the requirements of local laws or otherwise having regard to the particular issues arising from their own operations.

Ultimately, the individual Operating Companies have the local expertise and understanding which means they are best placed to identify relevant needs and apply the processes and practices that enable them to operate legally, responsibly and ethically over the long term, and to embed the expectations set out in the GGPs into their own culture, strategy and daily practices. For the same reason, the Operating Companies are also best placed to implement and monitor compliance with the policies and practices that they put in place. This promotes the continuity, development and progressive growth of those individual enterprises in an ethical and responsible way that is relevant to, and supportive of, their own local jurisdictions and cultures.

The Principles

The wellbeing of employees of the Operating Companies is of paramount importance. Operating Companies should seek to build successful and sustainable businesses and communities and to ensure their employees have fair and attractive employment. Leadership teams at the Operating Companies are responsible for implementing and maintaining effective policies and procedures relating to employee wellbeing.

Camellia expects the Operating Companies to have appropriate policies and procedures in place to ensure the wellbeing of their employees, which comply with applicable local laws and cover, at a minimum, the following core areas:

Fair pay

- Paying employees fairly in accordance with applicable local laws, regulations and market standards.

Working conditions

- Providing fair and safe working conditions in accordance with the Health and Safety GGP, applicable local laws, regulations and market standards.

Diversity and inclusion

- Promoting fair treatment and equal opportunities in employment in accordance with the Human Rights GGP.
- Addressing unlawful discrimination.
- Promoting an inclusive working environment that is sensitive to the needs of staff of differing backgrounds.

Anti-harassment, bullying and retaliation

- Implementing appropriate measures to prevent all forms of harassment (including sexual harassment), bullying or retaliation in the workplace.
- Implementing clear and confidential reporting channels for employees experiencing or witnessing harassment (including sexual harassment), bullying or retaliation in the workplace (including channels which allow reporting outside of management and executive directors).
- Implementing appropriate measures to investigate and respond to reports of harassment (including sexual harassment), bullying and retaliation in the workplace.
- Keeping accurate records of such reports, measures to resolve them and outcomes.
- Maintaining as appropriate confidentiality with respect to such reports.

Learning and development

- Providing access to suitable learning and development opportunities.
- Making appropriate training available.

Disciplinary matters

- Communicating expectations of conduct and behaviour to employees.
- Implementing appropriate procedures for dealing with disciplinary matters which include appropriate sanctions.
- Keeping accurate records of disciplinary matters.
- Maintaining confidentiality of disciplinary matters and disciplinary processes as appropriate.

Complaints

- Implementing clear channels for employees to raise formal and informal complaints or grievances about workplace matters affecting them (this could, for example and where appropriate, form part of a wider whistleblowing/complaints channel or be a standalone grievance procedure – see separate GGPs on whistleblowing and complaints).
- Implementing appropriate procedures for responding to complaints, including investigation of concerns where appropriate in accordance with the Operating Companies' relevant policies.
- Keeping accurate records of complaints, measures to resolve them and outcomes.
- Maintaining confidentiality of complaints and complaint processes as appropriate.

Privacy and personal data

- Implementing measures for the appropriate and lawful treatment of employee personal data and respect for employees' rights to privacy.

Each Operating Company is responsible for, within the above frame of reference, assessing, managing, and addressing the unique employee wellbeing needs as they arise in their own operations. This may include, but is not limited to, implementing adequate policies and procedures, conducting appropriate due diligence, acting on any findings and integrating the responses to these due diligence processes into their own policies and internal systems.

Operating Companies are expected to undertake and continue training of their relevant directors and employees and, where appropriate, suppliers to raise awareness of employee wellbeing issues and to assist in identifying risks in their given businesses and supply chains.

Camellia expects that each Operating Company will undertake a regular, risk-based review of their compliance with their policies and procedures including, where necessary, using external expertise.

Any issues identified by any employee, officer, consultant, contractor, volunteer, intern, casual worker and agency worker with respect to these GPs can and should be immediately notified to the appropriate point of contact at the relevant Operating Company and, where appropriate, in accordance with its whistleblowing and/or speak up policies.