

Group Guiding Principles: Human Rights

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

Camellia believes that people and communities flourish where human rights are respected, and recognises the critical role played by the Operating Companies and their suppliers in helping to source responsibly and sustainably. Camellia has accordingly formulated this GGP which sets out the overarching principles underpinning its expectations of the Operating Companies with respect to human rights.

Camellia expects the Operating Companies (themselves, and in seeking to procure the same from their

partners and suppliers) to adhere to the principles expressed in these and the other GGP. These include:

- Developing policies and procedures that are informed by and respect internationally recognised human rights, including the UN Guiding Principles on Business and Human Rights. Where national law and international human rights standards are in conflict, Camellia acknowledges that each Operating Company will need to adhere to national law, while seeking ways to respect international human rights standards to the greatest extent possible.
- Opposing all forms of human trafficking, forced labour and child labour (including as outlined in Camellia's Modern Slavery Act Statement).
- Respecting the right of freedom of association.
- Empowering women.
- Supporting access to rights, opportunities and fair treatment regardless of gender.
- Promoting diversity and inclusion.
- Treating employees and other workers fairly and in line with the legislative framework applicable to the jurisdictions and environments in which they operate.
- Providing safe working conditions, in keeping with the principles outlined in these and other applicable GGP (including the Health and Safety GGP and the Employee Wellbeing GGP).
- Conducting due diligence on human rights risks and taking steps to prevent, mitigate, and remediate any negative impacts.

Each Operating Company is responsible for, within the above frame of reference, assessing, managing, and addressing the unique human rights risks as they arise in their own operations. This includes, 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 human rights 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 GGP 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.