



## **HUMAN RIGHTS POLICY**

### **1. STATEMENT**

Eastern Produce Malawi Limited is committed to respecting and promoting Human Rights as guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the four principles of the UN Global Compact: Human Rights, Labour, Environment and Anti-Corruption with Governance cross-cutting the four principles.

We respect internationally recognized Human Rights frameworks including the Universal Declaration on Human Rights, 1948, the International Bill of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, 1998, the Bill of Rights under the Constitution of the Republic of Malawi, as amended and the Malawi National Action Plan on Business and Human Rights (2020–2025). In the conduct of business, we commit to abiding by National Laws, Policies and Standards whilst guided by relevant International Policies and standards.

Aligned with our Code of Conduct & Ethics, our Human Rights Policy is complemented by the following policies and frameworks: Standard Operating Procedures on Operational Grievance Mechanisms; Environmental Policies; Collective Bargaining Agreement; Community Engagement Strategy; Occupational Safety & Health Policy; Anti-sexual Harassment Policy; Modern Slavery Policy; Whistle Blowing Policy; Data Protection Policy, Fair Treatment & Good Working Conditions Policy and Recruitment

Policy; In addition we have thematic committees established, tenured and assigned responsibilities to implement & provide insight.

## **2. SCOPE OF POLICY**

This Policy applies to all employees of Eastern Produce Malawi Limited and extends to those with whom we conduct business including suppliers, service providers, contractors, partners and surrounding communities, all of whom we shall encourage to respect the principles of this Policy. In line with the United Nations Sustainable Development Goals, we strive to leave no one behind and pay particular attention to vulnerable groups such as women, children, Human Rights Stakeholders and persons living with disabilities.

## **3. POLICY COMMITMENTS**

We are committed to:

- a. Promoting a working environment that is anchored within the principles of free choice of employment, equal opportunity, non-discrimination, safe working conditions and access to remedy.
- b. Drawing the linkages between the environment in which we operate and the impacts on our business and communities to enhance environmental due diligence.
- c. Actively engaging Human Rights Stakeholders as an integral part of our decision-making process, continuous improvement efforts and policy reviews.
- d. Respecting and upholding the rights to freedom of opinion and expression and endeavoring to ensure that our employees, communities and stakeholders can freely voice their concerns and participate in societal affairs without inhibition.

- e. Striving to eradicate all forms of human trafficking, illicit forms of child labour and forced labour within our operations and in our value chains.
- f. Continuing to uphold fair remuneration and compensation practices in line with terms outlined in the applicable collective bargaining agreements.
- g. We believe that employees and suppliers should have access to and observe the rights to freedom of association and collective bargaining without unlawful interference or restriction; including the right to participating, forming, joining or leaving a Trade Union.
- h. Opposing any forms of threats, intimidation, harassment, or violence directed at any of our employees and stakeholders.
- i. Integrating a continuous Human Rights due diligence process of assessment of impacts, integration of actions, tracking of actions and communicating on progress to relevant stakeholders.

#### **4. IMPLEMENTATION, GOVERNANCE AND OVERSIGHT**

Eastern Produce Malawi Limited will develop a Human Rights Action Plan annually, around salient issues with actionable items, internal responsibility allocation and implementation timelines. The following outlines our strategy towards implementing this policy and Human Rights Action Plans:

- a. Undertaking due diligence measures informed by the analysis of stakeholder feedback, independent Human Rights impact assessments, and grievance analyses for effective prevention, mitigation, and remediation of impacts.
- b. Integrating Human Rights and gender-sensitive approaches into our policy, operations, and management systems.
- c. Supporting a Senior Management function to spearhead the development and implementation of our Human Rights strategy.

- d. Implementing an Operational-level Grievance Mechanism (OGM) aligned to the UNGPs to address impacts that may be caused by, contributed to, or linked to our operations.
- e. Working with the Head of the Independent Human Rights Mechanism (IHRM) and an Independent Monitor to report on the implementation of our Independent Operational-level Grievance Mechanism (OGM).
- f. Building awareness through provision of trainings to our employees and suppliers to enhance compliance with this policy and their roles in upholding the policy.
- g. Engaging in ongoing and meaningful dialogue with our stakeholders about the effectiveness of our actions.
- h. Monitoring and disclosing our Human Rights performance to ensure accountability and continuous improvement.

## **5. POLICY REVIEW**

The EPM Policy Review Committee (PRC) will conduct regular periodic reviews of this Policy to evaluate its effectiveness. Any necessary revisions will be discussed and recommended to the Directors.

## **6. POLICY APPROVAL**

Approved by the Board of Directors following review by the EPM PRC.

Revision Date: January 2026 || Approved by Board of Directors ||