

## Human Rights Policy

### 1 Purpose

Jani-King (NZ) Ltd (“JKNZ”) and subsidiary companies are committed to integrity and fairness in all that we do and how we relate to each other, our customers, and our business partners. Upholding human rights is a vital part of that commitment. This Policy sets out the principles which guide our practices impacting human rights.

### 2 Field of Application

This document applies to directors, employees, franchisees and contractors (including employees of franchisees and contractors) of JKNZ and its subsidiaries.

### 3 Definitions

Term	Definition
Modern Slavery	<p>Modern slavery describes situations where coercion, threats, or deception are used to exploit victims and undermine or deprive them of their freedom. It is a crime and a violation of fundamental human rights. It can take various forms, including:</p> <ul style="list-style-type: none"> <li>• trafficking in persons;</li> <li>• slavery;</li> <li>• servitude;</li> <li>• forced marriage;</li> <li>• forced labour;</li> <li>• debt bondage;</li> <li>• deceptive recruiting for labour or services; and</li> <li>• the worst forms of child labour.</li> </ul>

### 4 Policy Statement

JKNZ supports the intent of the UN Guiding Principles on Business and Human Rights as well as related international conventions, treaties, and protocols. We are committed to protecting our organisation and workers at risk of modern slavery or human trafficking both:

- in our operations and supply chain; and
- whether those workers are our direct employees, franchisees and their employees, and those who do work for us via third party suppliers.

JKNZ takes a zero-tolerance approach to inaction against modern slavery and human trafficking and seeks to work towards ensuring modern slavery is not taking place anywhere within our operations or in any of our supply chains. Although not included in the definition of modern slavery, we are aware that practices such as substandard working conditions or underpayment of workers can escalate into modern slavery. We, therefore, also do not tolerate the continuation of these practices.

### 5 Supplier conduct

While performing work for JKNZ, we expect suppliers to adhere to all applicable anti-slavery, human trafficking, workplace, and anti-discrimination laws. We also expect suppliers to apply the principles set out in this Policy to their workers.

## **6 Modern slavery**

JKNZ acknowledges that combatting human rights issues takes a concerted effort. JKNZ will continually assess and improve how we reduce the risk of modern slavery practices within our supply chains and operations.

## **7 Fair treatment**

JKNZ supports the ILO General Principles for Fair Recruitment in our recruitment practices. We are committed to upholding the following principles:

### **7.1 Forced or Involuntary Labour**

Workers will not be subject to any form of forced labour. All work must be voluntary, and workers must have the freedom to terminate their employment working relationship at any time without penalty on reasonable notice.

### **7.2 Document Retention**

Confiscating or withholding worker identity documents or other valuable items, including work permits and travel documents, is strictly prohibited. The retention of personal documents must not be used as a means to bind workers to employment or to restrict their freedom of movement.

### **7.3 Contracts of Employment**

Written contracts of employment or contracts for services must be provided to all workers:

- in a language they understand; and
- clearly setting out their rights and responsibilities about payments, wages, working hours, and employment conditions.

### **7.4 Deposits**

Workers must not be required to lodge deposits or security payments at any time to secure work.

### **7.5 Workers Equality**

All workers must be treated fairly and without unlawful discrimination. No worker will be treated any less favourably than others. However, nothing in this Policy prohibits reasonable and objective differentiation between workers or the appropriate recognition of skills and qualifications.

### **7.6 Humane Treatment**

The workplace must be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures must be clearly defined and communicated to all workers. They must not include any inhumane punitive measure, including mental or physical coercion, verbal abuse of workers, or compulsory labour. Unless permitted by law, disciplinary policies and procedures must not result in wage deductions (or reductions in benefits). Threats of physical or sexual violence, harassment, and intimidation against a worker, his or her family, or close associates are strictly prohibited.

### **7.7 Wages and Benefits**

All workers must be paid at least the national minimum wage and must be provided all legally mandated benefits. Wage payments must be made at regular intervals, directly to workers, and must not be

delayed, deferred, or withheld. Only deductions, advances, or loans authorised by law are permitted. Clear and transparent information must be provided to workers about hours worked, rates of pay, and the calculation of legal deductions. All workers must retain full control over their earnings. Wage deductions must not be used as a disciplinary measure or to keep workers tied to their employment or their jobs.

## **7.8 Working Hours**

No worker may be:

- forced to work more than the number of hours permitted by law
- made to work overtime under threat of penalty, dismissal, or denunciation to authorities; or
- forced to work overtime as a disciplinary measure.

## **7.9 Freedom of Movement and Personal Freedom**

Workers must have freedom of movement. No worker's personal freedom may be unreasonably or coercively restricted.

## **8 Engaging with the Company Where There is a Concern!**

JKNZ will ensure that anyone can raise concerns about actual or suspected issues without fear of reprisal or retaliation. In the first event, contact can be made with the CEO, or People and Culture Manager, who will provide guidance and support.



**Nick James**

**Chief Executive Officer  
JK (2016) Limited**

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*Next revision date: July 2023*