

Human Rights Policy Statement

2022



DWF supports the principles of Human Rights set out in the Universal Declaration of Human Rights, the International Labour Organisation (ILO) core labour standards and is a signatory of the United Nations Global Compact. In addition, we support the UN's wider development agenda including the UN Sustainable Development Goals.

Respecting and advancing human rights is central to our purpose in delivering positive outcomes with our colleagues, clients and communities. We recognise that we have a responsibility to both respect human rights and opportunities to positively impact human rights across our value chain.

We are committed to working collaboratively with our stakeholders and other businesses on human rights to inform our approach and this statement aims to help our stakeholders to understand how we put our principles into action and how we are continuing to embed respect for human rights into our business operations.

Statement of Principles

DWF respects and values the dignity, wellbeing and rights of our colleagues, clients and communities taking action to:

- Support and promote the protection of internationally proclaimed Human Rights
- Assess our human rights impacts and integrate human rights considerations into our business
- Eliminate all forms of discrimination and promote a diverse and inclusive workplace
- Recognise the freedom of association and right to collective bargaining
- Provide a safe and healthy agile workplace
- Maintain a zero tolerance to slavery, forced labour and human trafficking
- Evolve our position globally as a Living Wage employer
- Embed anti-corruption and ethical standards in our business practices
- Accelerate our contribution to the delivery of the Sustainable Development Goals
- Promote a culture where colleagues feel comfortable to raise a concern and speak up
- Be transparent and provide accurate and timely disclosure

Our Focus

We aim to identify, assess and manage the human rights impacts of our business activities based on their operational context, our leverage and business relationships.

Our materiality exercise allows us to identify the issues most relevant our stakeholders and where we can make a meaningful positive impact. To that end, our primary focus is on our own operations and supply chain, although we aim to also prevent and mitigate adverse human rights impacts throughout our value chain.

Where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights relevant to our operations.

Embedding respect for human rights

How we operationalise our respect for human rights aligned with our purpose and values

As an employer we:

- Promote and embed equality, inclusion, diversity and measure our progress against published targets
- Recruit, recognise and reward colleagues on merit
- Implement and communicate policies and procedures, including our Business Code of Conduct and Business Ethics Statement
- Empower colleagues to take action to make others feel included and challenge if behaviour fails to live up to our shared values
- Make opportunities for professional development widely available
- Encourage colleagues to raise any concerns they may have regarding human rights, without fear of retaliation, through their line manager, HR or our Speak Up policy and confidential helpline
- Promote positive mental health and wellbeing
- Provide a safe, secure, supportive and agile working environment
- Engage colleagues through Pulse surveys and our Employee led forum and networks

- Support our communities through skills based volunteering, fundraising and leadership insights.

As a service provider we:

- Follow our Code of Business Conduct to put our values into practice. It helps us to do the right thing, to ask the right questions and make the right decisions for our clients
- Continue to integrate human rights risks along with other environmental, social and governance (ESG) risks to include deeper consideration of country and sector risks and escalation,(if required) before bringing new clients into our business
- Adhere to sensitive sector guidance to assess human rights risks and adverse impacts, these include Tobacco, Gambling, Energy & Natural Resources and Defence
- Assess risks concerning existing clients to anticipate emerging concerns or as part of the client annual review process
- Recognise the link between climate change and human rights and support clients to address help climate change to ensure human rights are protected
- Apply policies & procedures to help protect our clients, including Anti-Money Laundering, Data Privacy and Information Security
- Support those who are vulnerable, seek to minimise the risk of harm to the welfare of those we engage with
- Investigate any complaints thoroughly and fairly

As a purchaser of goods & services we:

- Evaluate suppliers as part of our due diligence process against key criteria, including their human rights provisions
- Require suppliers to sign up to our Supplier Code of Conduct, which defines our expectations and highlights the importance we place on respect for human rights in all our business relationships. We expect suppliers doing business with us to:
 - Respect the human rights of their employees and comply with all relevant legislation,

regulations and directives in the countries and communities in which they operate

- Ensure that all employees can make a free choice about their employment: there should be no illegal, forced, bonded, involuntary or exploited labour
- Ensure there is no involvement in incidences of human trafficking, child labour or involuntary movement of people for exploitation
- Pay wages which at least meet minimum national standards, overtime is voluntary, used reasonably and compensated fairly
- Respect the rights of your employees to associate freely, join or not join labour unions, seek representation and join workers' councils
- Provide a workplace free of harsh and inhumane treatment, mental or physical coercion or verbal abuse
- Commit to help suppliers address any human rights issues that may arise
- Publish the steps we have taken to combat the risk of modern slavery and human trafficking taking place in either our business or our supply chains.

As a supporter of communities we:

- Work with community partners who support some of the most socially and financially disadvantaged members of our communities
- Encourage fundraising by colleagues to enable the DWF Foundation to distribute grants to charities supporting the themes of education, employability, health & wellbeing, homelessness and environment & sustainability
- Help tackle specific community issues such as food poverty and youth unemployment
- Encourage colleague involvement, primarily through volunteering in support of those too often excluded in society
- Collaborate and shape the agenda for action, working with other leaders to identify the ways in

which business can help innovate and create more sustainable livelihoods and prosperous communities

- Enable and empower young people to develop skills and confidence for the benefit of themselves and their communities.

Governance

The DWF Group Board has oversight of our approach to human rights and our management of human rights risks.

Our ESG Leadership Group has responsibility for our sustainability agenda including human rights.

This Group identifies and reports to the Executive Board and PLC Board on ESG risks and opportunities and actions needed to improve in line with the ESG Strategy and evolving internal and external stakeholder expectations. It meets at least quarterly.

The Executive Board receives reports on the role and responsibilities of the ESG Leadership Group from the Group Head of ESG at least quarterly. The PLC Board receives reports at least twice a year.

Our next steps in managing our approach to respecting human rights in 2022-23

We communicate on our commitment to respecting human rights on the DWF Group website and Annual Review, but report our approach and performance regarding human rights primarily through our annual Communication on Progress, as a signatory to the UN Global Compact.

While this statement outlining our approach is publicly available, we recognise the need to proactively share and engage with our key stakeholders to deepen understanding and to remain alert to their expectations in relation to our human rights approach.

We also recognise the need to improve the tracking and monitoring of our human rights approach and expand the scope of human rights training provided for our colleagues.