

# Human Rights Policy

September 2024

## 1 Introduction

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1.1 As a business with 'People at the heart' Grainger supports the fair and humane treatment of people throughout the world. Human rights are universal. Respecting human rights means to recognise that everyone is entitled to be treated fairly, with dignity, irrespective of where they live, regardless of race, sex, religion or any other status. Our Human Rights Policy is part of our commitment to respect, uphold and avoid infringing upon the human rights of others. We are committed to supporting and respecting internationally proclaimed human rights and seek to avoid complicity in human rights abuses.

1.2 We adhere to the principles as defined by the:

- United Nations ('UN') Guiding Principles on Business and Human Rights
- UN International Bill of Human Rights and the International Labour Organisations ('ILO') Declaration on Fundamental Principles and Rights at Work

We do not tolerate the violation of human rights within Grainger and seek to establish relationships with those who share the same principles and values. We aim to prevent any action that has an adverse impact on human rights, either by Grainger or those acting on our behalf, and strive to remedy any adverse impact if it occurs. We also seek to promote human rights awareness and respect along our value and supply chains.

## 2 Scope

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2.1 This policy applies to all Grainger group company employees (both temporary and permanent) and those undertaking activities on behalf of Grainger.

2.2 Every employee, contractor and third party undertaking activities on behalf of Grainger shares the responsibility to respect human rights. This means to avoid infringing on the human rights of others and to address these infringements where they occur.

2.3 Grainger's executive management are responsible for ensuring adherence to these commitments, overseeing their implementation and ensuring that any breaches of this policy are investigated.

## 3 Being a Responsible Business

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3.1 We strive to be a responsible business; from our environmental efforts, being ethical in our approach to how we do business, our charitable partnerships, supporting our communities and employee fundraising efforts.

3.2 Our vision is to use our expertise, influence and passion as a force for good in our local communities and the wider world. We have a Responsible Business Committee that works to uphold our values in this area and this approach is embedded in our culture and policies. As a responsible business, we commit not to tolerate the use of child or forced labour, modern slavery or human trafficking across our business and operations.

## 4 Respecting Human Rights as an Employer

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4.1 As an employer, Grainger upholds the human rights and labour rights of its employees. Grainger promotes equal opportunities through recruiting, retaining and developing individuals with diverse backgrounds and experiences throughout business. Grainger

proudly and actively celebrates differences and has a zero tolerance for discrimination or harassment.

- 4.2 Through the implementation of our Health and Safety Policy, we are committed to providing and maintaining a safe, secure and healthy working environment for our employees, including the provision of just and fair conditions at work to meet accessibility requirements. We are committed to supporting the well-being of our employees and providing well-being initiatives designed to prevent conditions from developing by supporting the early recognition of symptoms.
- 4.3 We respect our data privacy and remain committed to the security of all personal information that we may collect or may be shared with us. Confidentiality, integrity and availability of systems and services holding such information is of the utmost importance to Grainger.
- 4.4 We encourage our employees to provide honest feedback through the issuance of regular surveys and roundtable meetings. We maintain a Whistleblowing Policy to encourage employees to speak up and report genuine concerns about conduct or activity; such information is widely accessible to our employees. Additionally, Grainger respects and supports our employees' rights to choose to be a member of a trade union and to collective bargaining in accordance with local laws.

## 5 Respecting Human Rights as a Business Partner

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- 5.1 Grainger looks to ensure that we only engage with responsible vendors. Prior to onboarding, prospective suppliers are subject to due diligence to ensure that we are engaging with suppliers with similar values to those of Grainger.
- 5.2 We are committed to encouraging all our suppliers mirror our commitment to responsible business practices and support for human rights to ensure that this is reflected in our supply chain.

## 6 Communication of Policy

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- 6.1 All employees, third parties and associated persons acting on our behalf must ensure that they read, understand and comply with the Human Rights Policy.
- 6.2 The Human Rights Policy, together with any other documentation which supports the Human Rights Policy, will be communicated to third parties and incorporated into contractual dealings.

## 7 Responsibilities

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- 7.1 The Board of Directors has overall responsibility for general oversight including: -
  - 7.1.1 ensuring the Human Rights Policy and procedures are adequate and otherwise comply with our legal and ethical obligations.
  - 7.1.2 that all those under our control comply with it.
  - 7.1.3 ensuring that the effectiveness of the Human Rights Policy is monitored by the Audit Committee; and
  - 7.1.4 periodically reviewing the Human Rights Policy.

- 7.2 Day to day responsibility for implementing this policy is that of every member of staff with support and guidance from their manager. Line managers are responsible for receiving reports of potential issues from employees and third parties. promptly passing any such reports to relevant department head and the Legal, Risk and Governance Department, and co-operating with any internal or external investigation.
- 7.3 Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.
- 7.4 Employees are responsible for the prevention, detection and reporting of suspected human rights abuses.