



COMVITA LIMITED HUMAN RIGHTS POLICY

Approved by the Comvita Board: 27 November 2024

Review Period: 2 years

Next Review Date: November 2026

INTRODUCTION

Comvita seeks to do business in a way which treats all people with dignity and respects their human rights. We acknowledge that every human being globally is entitled to enjoy their fundamental human rights without discrimination. This includes, for example, the rights to free choice of employment, fair remuneration, reasonable working hours, safe and healthy working conditions, and freedom of association and collective bargaining. Exploitation of workers in the form of forced, compulsory and child labour, debt bondage, forced marriage, slavery, human trafficking, discrimination, unreasonable and/or abusive disciplinary practices, and other forms of modern slavery are breaches of these fundamental rights.

The philosophy of caring for and supporting our local and global communities, and committing to positive outcomes for people and nature, underpins all Comvita business and decision making. Through our Harmony Plan, Comvita has outlined our aspirations and commitments to deliver positive impact for people, bees, and the planet, leaving the world in a better place. Protecting human rights is fundamental to the positive impact we seek for our global whanau and more generally.

PURPOSE AND SCOPE

The purpose of this policy is to help us embed a culture of respect and responsibility, and to guide our activities to support the prevention and mitigation of negative human rights impacts from Comvita's operations.

This policy covers all individuals and communities affected directly by Comvita's operations and our value chain globally. This includes, without limitation, our employees, contractors, outsourced staffing providers, external suppliers, and customers.

OUR COMMITMENTS

Comvita is committed to respecting human rights. We will seek to assess, prevent, and remedy potential and/or actual negative human rights risks and impacts through the following:

1. **Legislative compliance and international policy alignment** – Conforming to relevant local and international legislation, including alignment with the United Nations Guiding Principles on Business & Human Rights, Universal Declaration of Human Rights, and International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work.



2. **Fair, safe and healthy workplace** – Maintaining a working environment that:
 - Supports the safety, health and wellbeing of our employees;
 - Is free from discrimination and harassment of any form;
 - Provides employment, development opportunities, and promotion based on merit;
 - Remunerates our employees fairly and reasonably for the work performed relative to others; and
 - Respects our employee's rights to external support, freedom of association and collective bargaining if necessary to promote their interests.
3. **Assessment of human rights risks** – Proactively identifying, assessing and prioritising the potential and actual negative human rights impacts on people throughout our operations and value chain.
4. **Strategy development** – Developing an annual human rights strategy and action plan to address Comvita's most salient human rights issues.
5. **Action and remediation** – Preventing, mitigating and remedying appropriately the actual and potential negative human rights impacts Comvita has caused or contributed to, including taking appropriate action with our suppliers and customers.
6. **Supporting policies** – Implementing appropriate supporting policies to ensure compliance with our commitments under this policy (refer to Related Policies below).
7. **Internal team engagement** – Providing tailored training, guidance and support to our relevant employees to help ensure they understand our human rights expectations, supporting policies, and potential negative human rights impacts.
8. **Supplier due diligence and engagement** – When procuring goods and services, we will:
 - Consider the potential human rights risks and impacts when selecting source countries, raw materials, and specific suppliers;
 - Incorporate appropriate contractual provisions, including our Supplier Code of Conduct; and
 - Implement appropriate supplier due diligence, monitoring, engagement and support.
9. **Reporting mechanism** – Operating a formal speak up (grievance) channel and process for internal staff and external stakeholders to raise concerns regarding human rights issues.
10. **Continuous improvement** – Regularly monitoring and evaluating the effectiveness of our human rights strategies and activities against our objectives, identifying learnings and future improvements, and with the evaluation results shared with senior management and the Board.



11. **Transparent disclosure** – Publicly disclosing our Human Rights Policy, our most material human rights issues and their management, and our Supplier Code of Conduct.

ROLES & RESPONSIBILITIES

Implementation will be led by the Chief Purpose and Transformation Officer, with support from all Comvita Leadership Team members.

COMMUNICATION

This policy is communicated to all interested parties as well as being made available to our wider community through publication on our external website and internal staff intranet.

COMPLIANCE

Internal staff should discuss any known or suspected instances of non-compliance with their manager, Leadership Team member or otherwise take action in accordance with Comvita's Speak Up Policy. Any suppliers or other external stakeholders who wish to raise concerns should contact feedback@comvita.com.

RELATED DOCUMENTS

- Comvita Speak Up Policy
- Comvita Code of Ethics
- Comvita Directors and Officers Remuneration Policy
- Comvita Diversity, Equity and Inclusivity Policy
- Comvita Health and Safety Management Policy
- Comvita Bullying, Harassment and Discrimination Policy
- Comvita Sustainable Procurement Policy
- Comvita Supplier Code of Conduct