

# JCB HUMAN RIGHTS POLICY

## INTRODUCTION

JCB is committed to respecting internationally recognised Human Rights principles and standards in all aspects of our business operations. In addition, JCB complies with all relevant national laws and regulations in all jurisdictions within which it operates.

## POLICY SCOPE

This policy forms the basis to ensure these principles are applied throughout our business operations including our supply chains and sales operations, employees, workers, officers, consultants, contractors, and any other third parties engaged with us in any of JCB's businesses. JCB expects all its suppliers and dealers to respect and adhere to JCB's Human Rights policy.

## HUMAN RIGHTS PRINCIPLES

The following human rights principles are relevant to JCB's business:

### 1. Freedom from Discrimination

JCB is committed to ensuring that no form of discrimination is practiced in any area of its business, including recruitment, compensation, promotion, training, working conditions and retirement based on gender, age, race, colour, disability, pregnancy or maternity, religion and belief or sexual orientation.

### 2. Right to Equality between Men and Women

JCB is committed to ensuring equality between men and women in all areas of its business in accordance with applicable law.

### 3. Freedom from Slavery

JCB has a zero-tolerance approach to slavery, servitude, forced labour and human trafficking (Modern Slavery) within our operations and supply chain. Please also see JCB's Modern Slavery Statement published on the JCB.com website.

### 4. Freedom of Children from Social or Economic Exploitation

JCB will not use child labour in its business operations and expects its suppliers and dealers to also apply this zero-tolerance approach and in accordance with all relevant laws.

### 5. Right to Privacy

JCB respects the right to reasonable and appropriate privacy of our personnel in the workplace or any visitors to our premises. Any workplace monitoring is controlled, managed, proportionate and limited to the purpose for which it is required and legitimately conducted in accordance with the law. JCB controls, processes and manages personal data in accordance with all applicable data protection legislation.

### 6. Right to Just and Favourable Conditions at Work

JCB is committed to providing a safe and healthy workplace to our personnel in all business operations and in full compliance with applicable laws. JCB prohibits any form of physical abuse, the threat of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation. Disciplinary and grievance procedures are clearly documented and communicated. All disciplinary and grievance measures are recorded and actioned.

## **7. Freedom of Association and Collective Bargaining**

JCB recognise our employees' rights to join trade unions and participate in collective bargaining. JCB's recognised trade union in the United Kingdom is the GMB. JCB works closely with the GMB in all appropriate areas of the UK business operations. Other Unions are affiliated with JCB in other countries.

### **SUPPLIERS AND DEALERS**

JCB expects all suppliers and dealers to comply with the above principles. All new suppliers and dealers are subject to appropriate due diligence processes before appointment and are required to sign up to the JCB Supplier Code of Conduct (suppliers) and JCB Dealer Charter (dealers) which incorporate the above. JCB recognises that human rights impacts may change over time and therefore due diligence is an on-going process. Supplier and dealer audits (both internal and external) form part of this process.

If any adverse human rights impacts are identified as part of these processes, then those will be discussed and reviewed with the relevant supplier or dealer in a fair, equitable and transparent manner and in compliance with principles of natural justice. JCB reserves the right to terminate any commercial relationship with any supplier or dealer where there is clear evidence of a failure on their part to comply with the terms of this policy.

### **ENVIRONMENTAL IMPACT**

Conserving and protecting the environment and communities potentially affected by environmental damage, is a long-standing aim of JCB. As a world leading manufacturer JCB's objective is to produce sustainable solutions for our customers. JCB adopts systems and processes which allow the impact of our work on the environment and communities to be evaluated and considered with a view to reducing any negative impact.

### **COMMUNICATION**

JCB will ensure that the JCB Human Rights Policy is effectively communicated internally within the business through the JCB intranet and externally through the JCB.com website. JCB's Human Rights Policy will also be issued to its suppliers alongside the JCB Supplier Code of Conduct and to dealers alongside the JCB Dealer Charter and JCB Dealer Standards. Reference will also be incorporated into all relevant commercial contracts.

### **RESPONSIBILITIES**

This policy has JCB Executive approval, and its operation will be overseen and implemented by the Group HR Director supported by the relevant Group Directors responsible for Purchasing (JCB Suppliers) and Dealer Development (JCB Dealers). The policy will be formally reviewed on an annual basis and updated as required. All JCB directors and business leaders are expected to support and communicate this policy to their teams in the business and externally to suppliers and dealers.

Max Jeffery

JCB Group HR Director