

POLICY APPROVED: 18 August 2022

POLICY LAST REVIEWED: 18 July 2023

OWNER: Julie Harrison, Director, Clareville Pty Ltd

1. Introduction

This Supplier Code of Conduct (**Code**) relates to your dealings with Clareville Pty Limited (**Harrison**), and its associated entities from time to time including:

- Harrison Manufacturing CO Pty Limited;
- A S Harrison & CO Pty Limited;
- Harrison Investments Pty Limited;
- Harrison SPARC Pty Limited; and
- A S Harrison & Co Pty Limited (NZ).

(together, the **Harrison Group**).

The Harrison Group is committed to our corporate values of integrity, quality, innovation, safety and success. We are committed to a high standard of ethical behaviour and ethical decision making is key to our business processes and our approach to our operations and supply chain.

2. What is the purpose of this Supplier Code of Conduct?

Identifying and assessing these risks in our large and complex operations and supply chains can sometimes be challenging. Our customers and other stakeholders are increasingly concerned about the ethical sourcing of our goods and services. Like them, we also care about how we make and where we source our products and services.

We care about human rights and the environmental practices involved in our business and supply chains. We are committed to implementing processes in our business which will help address modern slavery and human trafficking risks within our operations and supply chains.

This Code serves as one of those processes to further enhance our engagement with suppliers in order to identify and implement the steps to respond to modern slavery and human trafficking risks across our supply chains.

The Harrison Group is committed to upholding the human rights of workers and to treating them with dignity and respect as understood by the international community.

This applies to the Supplier's workers, including temporary, migrant, student, contract and direct employees.

3. **What are modern slavery and human trafficking?**

Unfortunately, modern slavery and human trafficking are global problems involving grave human rights abuses for victims and can occur in the operations or supply chains of any organisation, regardless of the industry or sector.

Modern slavery covers all types of slavery and servitude, including forced or compulsory labour, debt bondage, indentured servitude, force marriage or the worst forms of child labour. An example of modern slavery is if an organisation engages workers for the purpose of producing raw materials and these workers live in a dormitory provided by their employer but are only allowed to leave the dormitory to work.

Human trafficking refers to the recruitment, transportation, transfer, harbouring, or receipt of persons for the purposes of exploitation, including modern slavery, by means of the threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability, or the giving of payments or other benefits. An example of human trafficking is if a recruitment agency promises some foreign workers that they will be carrying out IT services in Australia but when they arrive, they have their passports confiscated and are forced to do menial work in a clothing factory with no pay and limited food.

Appendix 1 to this Policy has some potential indicators of modern slavery and human trafficking, which you will find helpful if you are involved in procuring goods or services, recruiting staff or visiting factories, or simply want to learn more about this issue.

4. **Who does this code apply to?**

This Code applies to all of Harrison Group's suppliers who provide goods and service to the Harrison Group (together, **Suppliers** and individually **Supplier**). Suppliers are responsible for ensuring their employees workers, representatives, agents and sub-suppliers comply with this code.

5. **Our expectations**

All Suppliers must have in place policies and systems that are consistent with the commitments outlined in this Code. We expect our Suppliers to share these same standards with its sub-suppliers so that our standards of conduct flow upstream in our supply chain.

All Suppliers must in all of their activities for an on behalf of the Harrison Group follow the applicable laws and regulations of the countries in which they operate. For the avoidance of doubt, where this code imposes more requirements than the applicable

local laws or regulations, the expectation is that suppliers will adhere to the local laws and regulations as well as this Code.

The Harrison Group recognises that Suppliers may not be able to deliver all of the requirements of this Code instantaneously. As part of our commitment to working with our supply chains, we will work with our Suppliers to continuously improve on any conduct that falls short of the expectations set out in this Code. We encourage our Suppliers to be transparent in their communications with us, so that we can work together to effect change over time.

Consequences for non-compliance will depend on the nature of the violation and, depending on the circumstance, may include the suspension or termination of the Harrison Group's relationship with any non-compliant Supplier.

Our goal is to work with Suppliers to improve conditions through communications, supplier engagement, monitoring and follow-up assessments and expects Suppliers to cooperate with us to identify and remediate potential violations of the Supplier Code.

6. How to report a breach and contact information

If you have any questions about the content of this Code or wish to inform the Harrison Group of any known or suspected issues of non-compliance with this Code, please contact us at harrisongroup@harrison.com.au.

Appendix 1: Supplier Standards

The Harrison Group expects its Suppliers to act ethically and with integrity in all business dealings and requires that each Supplier—at a minimum—adhere to the following standards:

1. **Child labour**

Suppliers will not use child labour at any stage of its manufacturing process.

the term 'child labour' refers to the labour of persons below the greater of the following ages:

- (a) the minimum age for employment in the country of employment; or
- (b) the age for completing compulsory education in the country of employment.

However, in countries where the minimum age for employment or the age for completing compulsory education is below 15 years old, we expect Suppliers to use their best efforts to ensure that they do not employ any workers below that age, even if applicable laws in the countries of employment continue to permit employment of such workers.

Suppliers may use legitimate, voluntary workplace apprenticeship programs, such as student internships, only if they comply with all laws and regulations of the country of employment, and if the participants receive some form of compensation for their work. Appropriate compensation may include academic credit for a course of study at a reputable educational institution, or wages consistent with the rate for other entry-level workers performing equivalent tasks. Suppliers should ensure proper management of participants in legitimate, voluntary workplace apprenticeship programs through the provision of appropriate support and training to participants, proper maintenance of participant records, rigorous due diligence of educational partners, and protection of participants' rights in accordance with applicable laws and regulations. Suppliers must not ask workers to perform work that is likely to jeopardise their health, safety or well-being.

We are also cognisant of the health, safety and morals of young workers (individuals aged between the minimum employment age limit and 18 years) and Suppliers must ensure that they are protected from working conditions that may harm their health, safety or development.

In order to prevent the occurrence of child labour, Suppliers must take steps including but not limited to:

- Having appropriate employment policies specifying the minimum age for employment and having documented processes and procedures in place to verify the age of job applicants (including, where applicable, ensuring any third-party agencies conduct identification checks have processes in place to verify the age of workers);
- Having documented policies, procedures and training to ensure that young workers are protected from working conditions, including night work and hazardous conditions, that may harm their health, safety or development;
- Complying with all relevant local regulations and laws in relation to employment young people, recruiting interns and apprentices (and maintaining necessary documentation of the relevant programs); and
- Ensuring that all children are prohibited from accessing any production areas at all times, (even when not in operation).

2. **Forced, bonded or involuntary labour**

Workers must be able to work freely under their own volition and cannot be forced, bonded or obligated to work against their will.

We do not tolerate any form of servitude, slavery, forced, bonded, indentured, human trafficked labour or other forms of modern slavery as defined under the *Modern Slavery Act 2018* (Cth).

Workers must be permitted to terminate their employment without retaliation in any form—threats, coercion, harassment, intimidation, violence, reassignment, demotion or firing—has no place in our supply chain. Any overtime work must be voluntary, and workers must have rights to refuse overtime work without fear of retaliation as described directly above. In addition, Suppliers must not induce or encourage workers to employment as a condition of fulfilling terms of debt to a third party or to the Supplier themselves.

Suppliers must not request workers to surrender any identification documents including but not limited to government issued documents such as passports, drivers' licences, birth certificates, other identification cards or personal items as a condition of employment.

In order to prevent the occurrence of forced, bonded or involuntary labour, Suppliers must take steps including but not limited to:

- Having written policies in place to prohibit all forms of forced labour, including but not limited to bonded or involuntary labour;
- Communicating this Code to workers and educating management level workers to ensure understanding of this Code;

- Ensuring overtime is voluntary and Suppliers allow workers to refuse work without fear of retaliation or disciplinary action;
- Ensuring there are processes and procedures in place to allow workers the freedom of movement during working hours to take breaks and to take leave from work in emergencies or exceptional circumstances such as illness, without the fear of retaliation or disciplinary action; and
- Having remediation processes in place where there is a suspected or potential occurrence of forced, bonded or obligated labour and complying with all applicable laws in this regard.

3. Wages and benefits

Suppliers must set wages and benefits to meet all applicable local laws. If a country does not have laws or regulations in regard to minimum wages or benefits then a Supplier must have regard to the industry standards within the country.

Wages should be paid regularly, directly to the worker and on time.

Suppliers must provide workers with plain and simple written documentation (in the worker's native language) explaining the terms and conditions on which workers are paid. This is so that workers can verify that they have been accurately compensated for the work they have performed.

In addition, Suppliers must take steps including but not limited to:

- Maintaining complete and accurate payroll documents in accordance with relevant local law requirements;
- Providing workers with information (in the worker's native language) about their employment conditions including pay, hours, overtime, benefits, compensation, leave entitlements, bonuses and incentives prior to them commencing work;
- Providing workers with information about the particulars and details of their wages (including days worked, leave entitlements, standard hourly rates, tax payable, overtime, etc) for the pay period concerned, each time that they are paid e.g. pay slip. Workers should have full control over any money earned;
- Having systems in place to make timely payments to workers including outstanding payments upon a worker's termination;
- Deducting wages only with the express permission of the worker. However, Suppliers must not make deductions from wages as a disciplinary measure or as part of a deceptive recruitment practice;

- Providing workers will all necessary equipment and tools (including personal protective equipment where applicable) to perform work safely; and
- Maintaining records of all disciplinary measures taken. These records must explain what the disciplinary measure was for, how the disciplinary measure was administered, and any actions taken to help prevent disciplinary action in the future.

4. Working hours and leave

Workers should only work those hours that ensure a safe and healthy working environment. Overtime must be voluntary and not excessive taking into account the extent, frequency and hours worked by an individual worker and the entire workplace.

- Suppliers must allow for adequate rest or leisure time between shifts. Workers should neither be disciplined by forcing them to work overtime, nor should there be a threat of dismissal where workers refuse to work beyond contracted hours.
- In addition, Suppliers must take steps including but not limited to:
- Keeping accurate and transparent record of all hours worked by workers and keeping such records for as long as required by local laws and regulations;
- Ensuring workers are working hours (including overtime) consistent with any local laws and industry standards, whichever enforces greater protection to workers;
- Having systems, policies and processes in place to monitor and assess excessive working hours to ensure control of working hours; and
- Ensuring workers entitlement to leave on public and annual holidays.

5. Migrant workers

Migrant workers are any workers who are not a citizen or permanent resident of the country of employment and have additional requirements to be eligible to work in the country. Migrant workers are vulnerable and more likely to be exploited by their employers since such workers are often found in countries where supply is limited. As such, Supplier's must ensure that all of the labour standards outlined in this Code apply to migrant workers.

The process of recruiting migrant workers must be transparent and migrant workers should be informed about the local labour laws prior to commencement of employment.

In addition, Suppliers must take steps including but not limited to:

- Having processes in place to verify migrant workers have the necessary rights to work under the local laws and regulations;
- Having a management system in place to check legal compliance of recruitment practices and ensuring recruitment agencies do not impose recruitment fees or other charges on migrant workers (including through contractual obligations);
- Working with recruitment agencies to ensure workers recruited overseas are trained in their native language and understand the terms and conditions of their employment prior to their departure;
- Ensuring that Supplier's absorb the full costs of recruitment, placement, training and on-boarding for workers;
- Ensuring that migrant workers are not required to surrender any identification documents; and
- Appointing, if necessary, an individual that is able to interpret and translate the local language of the migrant work to facilitate any grievance resolutions.

6. Regular Employment

Suppliers must provide each worker with an employment contract which stipulates all legally required terms and conditions. Workers who have a regular employment are entitled to benefits relating to labour and social security laws and regulations.

Supplier's labour obligations detailed above should not be avoided through the use of casual, temporary arrangements, fixed term contracts, voluntary schemes, apprenticeships or internship where there is no intention to provide regular employment.

7. Freedom of association

Suppliers must respect the right of workers to associate freely, join or not join labour unions or similar organisations and to bargain collectively. Workers should not be discriminated against for exercising this right. Worker representatives should be freely elected without supplier management involved and must have access to carry out their representative functions in the workplace.

Suppliers must permit workers to openly communicate and share grievances with management about working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

Where a collective bargaining agreement (**CBA**) is in place, Suppliers must adhere to the terms of the agreement. The CBA must be negotiated freely, voluntarily, and in good faith.

8. Harassment, abuse or discrimination

Suppliers must ensure that every worker is treated with respect and dignity. Suppliers must be committed to a workforce free of harassment and unlawful discrimination.

Suppliers must not engage in or support any form of harsh or inhumane treatment including intimidation, mental or physical coercion, physical, sexual, psychological or verbal harassment or abuse including the threat of any such treatment.

Suppliers must not engage in discrimination based on race, colour, age, gender, sexual orientation, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. In addition, Suppliers must not subject workers or potential workers to medical tests or physical examinations that could be used in a discriminatory way.

Suppliers must clearly define and communicate to workers the disciplinary policies and procedures in support of these requirements. Where possible, Suppliers should also provide training to supervisors and managers to inform them about harassment, abuse and discrimination in the workplace and how it should be managed.

9. Health and safety

Suppliers must provide a safe work environment to all their workers. This includes providing regular health and safety training to all workers, complying with all applicable laws and regulations regarding working conditions, controlling worker exposure to potential safety hazards, implementing emergency plans and response procedures and having procedures and systems in place to prevent, manage, track and report workplace injury and illness. Suppliers must have procedures that allow workers to report complaints about their working conditions.

In addition, Suppliers must take steps including but not limited to:

- Providing access to clean toilet facilities with suitable privacy and clean and drinkable water and, if appropriate, sanitary facilities for food storage. If accommodation is provided by the Supplier, it must be clean, safe, and meet the basic needs of the workers;
- Providing personal protective equipment where necessary and conducting regular inspections and checks on machinery in compliance with local laws and regulations;

- Appointing a senior management representative who is responsible for health and safety of the workplace; and
- Installing suitable emergency exits for all people at the workplace.

10. Environment

The Harrison Group is committed to integrating environmental practices and sustainability principles within its operations and supply chains. The Harrison Group expects all its suppliers and contractors not only to comply with all environmental laws, but to take all reasonable steps to minimise risks and negative impacts to the environment and community and strive to meet international environmental protection standards.

Suppliers must have response procedures in place to alert local environmental authorities in the event of an environmental accident or emergency. Suppliers should have trained environmental workers to handle environmental accidents or emergencies.

In addition, Suppliers must take steps including but not limited to:

- Maintaining all monitoring reports including but not limited to air, water, and noise per local law and regulation;
- Maintaining and keeping current all required environmental permits (e.g. discharge monitoring), licences, certifications, approvals and registrations and Suppliers must follow their operational and reporting requirements;
- Identifying and managing chemicals and other hazardous substances or materials posing a hazard to human health, human safety or the environment to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Suppliers must comply with local laws and regulations prohibiting or controlling the use of particular chemicals and other hazardous substances or materials;
- Characterising, monitoring, controlling and treating as required prior to discharge or disposal all waste water and solid waste generated from operations, industrial processes and sanitation facilities. Suppliers must ensure that there is no illegal dumping of waste to the local environment;
- Characterising, monitoring, controlling and treating as required prior to discharge all air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations;
- Committing to using resources efficiently and supporting renewable power. The Harrison Group wants Suppliers who share our commitment to the environment and who conduct their business in a similar way. Suppliers

must work to reduce consumption of resources, including raw materials, energy and water, throughout all aspects of the product lifecycle (e.g. product design, manufacturing process, packaging design, transportation, product use and product end-of-life management); and

- Managing and disposing of all materials in accordance with applicable laws, rules, regulations and directives, and in an environmentally responsible and secure manner, protective of the environment. At Harrison Group's request, Suppliers must provide evidence acceptable to the Harrison Group confirming that Suppliers have managed and disposed of materials in accordance with this Code.

11. **Business Integrity**

The Harrison Group prohibits Suppliers from engaging in fraud, bribery, corruption, extortion and embezzlement in any form in dealing with business partners, public officials and/or with any Harrison Group representatives. Suppliers must engage ethically in all dealings and provide transparent documentation and records. Suppliers must have a zero tolerance policy towards any and all forms of bribery, corruption, extortion and embezzlement and must monitor and enforce procedures to ensure compliance with relevant anti-corruption laws.

Suppliers must have valid and current business registrations and other documents required for legal operation, including but not limited to building safety, fire safety, and waste disposal permits.

Supplier is expected to exercise honesty, fair dealing and proper treatment of workers at all times.

12. **Management Systems**

Suppliers should have written policies and internal governance systems to manage Supplier compliance with local laws and regulations, including, but not limited to business code of conduct, work, health and safety, environment, recruitment practices, anti-corruption, etc. Suppliers should be communicating all policies and procedures to all workers to ensure understanding and implementation including where possible undertaking training on a regular basis.

The Harrison Group expects Suppliers to communicate the standards and expectations set out in this Code to their suppliers. In addition, Supplier should be conducting internal reviews and audits to identify improvement opportunities. Audit reports should be available for inspection by the Harrison Group.

13. **Compliance with laws**

Suppliers operate in full compliance with all applicable local laws and other applicable internationally agreed laws, rules, and regulations related to worker welfare, health and safety environmental compliance and the humane treatment of

animals. All requirements in this Code are in addition to (or in some instances reflect) compliance with applicable local laws and regulations.

14. Humane treatment of animals

Suppliers must use humane procurement and sound practices designed to prevent the mistreatment of animals. Suppliers must not use any animal labour or practices that cause unnecessary harm to animals in the manufacturing process. This includes but is not limited to, the use of animals to do physical labour such as carrying goods, or harvesting fruit or vegetables.

Animal testing for cosmetics has been banned in Australia since 1 July 2020. This means that new ingredients used exclusively in cosmetics manufactured or sold in Australia can no longer use data from animal tests to prove that they are safe for human use. Suppliers should be aware of the ban and comply with the ban on animal testing for cosmetics if applicable to their business.

Suppliers that produce ingredients that are for a non-cosmetic purpose, or are exempt from the ban on animal testing, should still use alternatives to animal testing where possible. If applicable to their business, Suppliers shall treat animals humanely, including minimising pain and stress.