



## Ethical Sourcing and Social Accountability Policy

### 1. STATEMENT

Bindaree Food Group (BFG) is committed to integrating ethical and socially responsible business practices into all facets of our operations, working to the highest legal, moral and ethical standards, partnering with customers and suppliers who share these values, and in doing so, exceeding the expectations of our valued stakeholders.

The BFG Ethical Sourcing and Social Accountability Policy incorporates all relevant conventions of the International Labour Organisation (ILO) and the principles of the United Nation's Universal Declaration of Human Rights and aims to ensure all areas within our supply chain exceed the appropriate minimum ethical and social standards. BFG will take reasonable and practical steps to identify, assess, manage, and improve the elements of its operation that can impact adversely on our ethical and social responsibilities. In line with sound business practices, BFG will:

- Conduct business with fairness, honesty, integrity, and respect for the interests of stakeholders.
- Comply with laws and regulations within the countries in which BFG operates, endeavouring to achieve the highest standards for ethical conduct, environmental protection whilst ensuring the safety, quality and integrity of our product and process.
- Ensure the rights of workers and other relevant stakeholders in our business operations and supply chains are respected whilst actively seeking opportunities to improve working conditions.
- Prevent the use of child labour and forced labour, improve health and safety, support freedom of association, prevent discrimination, implement performance management, and manage working hours.
- Develop a management system that establishes responsibilities, supporting policies, monitoring methods and a review process of performance.
- Actively engage with stakeholders who support BFG's principles and commitment to ethical sourcing and social accountability and strive to continually improve the ways in which we promote, communicate, and manage our ethical and social obligations with our employees, suppliers, contractors, and the wider communities in which we operate.

### 2. SCOPE

This policy and its principals applies to all team members and stakeholders within the BFG supply chain.

### 3. PRINCIPLES

#### Business Integrity

Engage professional business ethics in all dealings and provide transparent documentation and records.

Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise.

Appropriate policies are developed, and documentation is in place to ensure effective ethical management practices.

Version	Amendment Date	Authorised By	Position
2	3 April 2023	Andrew McDonald	Chief Executive Officer

**Freedom of Association and Right to Collective Bargaining**

All team members shall have the right to form, join, and organise trade unions of their choice and to bargain collectively on their behalf with the company, in accordance with local laws and established practices. Moreover, effective protection shall be accorded to workers’ representatives.

Worker’s representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under Law, facilitation will occur and will not hinder, the development of parallel means for independent and free association and bargaining.

**Safe Working Conditions**

Committed to providing a safe and hygienic workplace environment and shall take effective steps to prevent potential accidents and injury to workers’ health arising out of, associated with, or occurring in the course of work. BFG will afford the following and engage with suppliers and contractors that ensure the following requirements are met:

- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Workers shall receive adequate, recorded training to perform their jobs in a safe manner.
- Access to clean toilet facilities and to clean and drinkable water and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- Personal protective equipment is available, and workers are trained in its use.
- Safeguards on machinery must meet or exceed local laws.
- Suppliers shall assign responsibility for health and safety to a senior management representative.

**Child Labour**

Support the International Labour Organisations Minimum Age Convention, 1973 No. 138 with regard to the appropriate age of workers and will ensure compliance with local laws and requirements. BFG will not engage suppliers or contractors who use child labour. Child labour refers to work that deprives children of their childhood, their potential and their dignity, and is harmful to their physical and mental development. Child Labour includes work that:

- Is mentally, physically, or morally harmful to children;
- Can negatively affect their mental, physical, or social development, and
- Interferes with their schooling:
  - by depriving them of the opportunity to attend school;
  - by obliging them to leave school prematurely; or
  - by requiring them to attempt to combine school attendance with excessively long and heavy work.

**Forced or Compulsory Labour**

Employment is freely chosen and as such there is no use of forced, bonded or involuntary labour. Workers are not required to pay ‘deposits’ or lodge identification papers with our company upon commencing employment and are free to leave their employment after reasonable notice is given. We ensure that forced

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or compulsory labour is not used in the supply of our materials, and we ensure that the overall terms of employment are voluntary.

### **Entitlement to Work and Immigration**

BFG and our suppliers will not engage in the use of Illegal Labour. All workers, including employment agency staff are validated for their legal right to work by reviewing original documentation. Stringent processes are in place to enable adequate control and ensure compliance with related legislation.

### **Remuneration**

Respect the right of personnel to a living wage and legally mandated benefits. We ensure that remuneration paid for a normal work week shall meet, at a minimum, national legal standards and shall be sufficient to meet the basic needs of personnel and to provide some discretionary income.

All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

Deductions from wages as a disciplinary measure or any deductions from wages not provided for by Law shall not occur without the expressed permission of the worker concerned. Deductions for disciplinary measures will not occur.

### **Working Hours**

Working hours comply with any Law and benchmark industry standards, whichever affords greater protection. Including overtime, workers must not work above the maximum hours per week or per month as stipulated by local laws.

Overtime shall be voluntary, shall not be excessive, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

Record keeping on hours worked is accurate, complete and transparent.

### **Regular Employment**

To every extent possible work performed must be on the basis of a recognised employment relationship established through national law and practice.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

### **Discrimination**

There is no discrimination in hiring, remuneration, access to training, promotion, termination, or retirement based on race, colour, national extraction or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions or affiliations, age, or any other condition that could give rise to discrimination.

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**Disciplinary Practices, Harsh or Inhumane Treatment**

All personnel will be treated with dignity and respect at all times. Physical abuse or discipline, the threat of physical abuse, mental or physical coercion, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

**Sub-Contracting and Home Working**

There shall be no sub-contracting unless previously agreed with BFG.

Suppliers must have adequate processes in place for properly managing sub-contracting and home working to ensure sub-contractors do not abuse, exploit or provide unsafe working conditions for their employees.

**Environment Compliance**

The facility shall comply with national and local environmental laws and regulations.

The facility shall dispose of its production waste in accordance with local environmental laws and regulations.

The facility must have identified and documented its key environmental impacts and implemented controls to minimise its impact on the environment with respect to solid waste disposal, hazardous chemicals storage and management, air and water emissions.

**4. COMPLIANCE WITH THIS POLICY**

BFG commits to comply with all aspects of this Policy and will endeavour to engage in working partnerships with its suppliers to help achieve compliance with this Policy. In the event where any supplier is unwilling or unable to demonstrate continuous improvement towards full compliance with these requirements, the trading agreement between BFG and the supplier will be terminated.

We value a culture of openness, where all individuals feel comfortable in disclosing matters that are of legitimate concern to them without fear of retribution. We will take seriously any allegations that human rights are not properly respected. We expect and encourage our employees and suppliers to report any concerns regarding unethical or illegal conduct, including in relation to human rights, firstly to their manager, or directly through the Whistleblower Policy. Where concerns are investigated and substantiated, we will take appropriate action.

**5. VARIATIONS**

BFG reserves the right to vary, replace or terminate this policy from time to time.

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