



Ethical Sourcing Policy

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Our Commitment

EBOS Limited and its subsidiaries (EBOS) are committed to the highest standards of conduct and ethical behaviour in all of our business activities, and to promoting and supporting a culture of honest and ethical behaviour and corporate compliance.

As part of this commitment EBOS has established an Ethical Sourcing strategy. The goal of the Group's Ethical Sourcing strategy is to engage with suppliers that are aligned with the broader EBOS's corporate values and ESG Program. Our ESG Program sets out the actions we will take to ensure we consistently and sustainably deliver on our responsibilities as a provider of essential infrastructure, products, and services.

Supplier Code of Conduct and this Policy

As part of the Ethical Sourcing strategy, EBOS has adopted a Supplier Code of Conduct (the Code) which sets out our basic expectations or minimum standards of suppliers.

This Ethical Sourcing Policy provides further details regarding some of the standards in the Code related to people, safety, workplace conditions and environmental standards.

Our expectations

Our expectation is that all suppliers adhere to the minimum standards established by the Code and this Policy.

EBOS is committed to working in partnership with its suppliers to help achieve compliance with the Code and the Policy. We will work collaboratively with suppliers, and their respective manufacturing sites, subcontractors, agents or personnel (as applicable) that may not yet meet the minimum standards but are open to improvement and genuinely committed to rectifying issues within agreed timeframes.

The level of monitoring and controls required will be in proportion to the nature of the relationship between EBOS and the supplier and certain risk factors. The monitoring and controls may include due diligence questionnaires, providing information via a third party (such as SEDEX), desktop audits and conducting on-site factory visits and assessments. EBOS may, at its discretion, require an independent audit of our suppliers to demonstrate compliance with the Code and this Policy.

In the event any supplier is unwilling or unable to meet the minimum standards established in the Code or this Policy, or improve within the agreed timeframes, any contracts between EBOS and the supplier may be suspended or terminated.

Minimum Standards

1. People and Safety

EBOS is committed to the health and wellbeing of its people and complying with labour laws and expects its suppliers to demonstrate the same commitment.

1.1. Child Labour

Suppliers must not use child labour; the use of child labour is a critical breach of the Code and this Policy.

Suppliers must comply with the minimum employment age limit defined by the local law applying to the supplier or by the International Labour Organization (ILO) Convention 138, whichever is higher. The ILO Convention 138 minimum employment age is the local mandatory schooling age, but not less than 15 years of age, subject to exceptions allowed by the ILO and local law.

Suppliers must be able to verify the age of all workers to ensure no child labour is used. Suppliers should have an employment policy specifying the minimum age for employment and have effective age verification procedures in place to implement this Policy. Suppliers should ensure any third-party agencies have procedures in place to verify the age of workers.

Persons between 16 and 18 years of age are considered young workers. Suppliers must ensure the health and safety of young workers are considered and protected.

Where the use of child labour is found to exist, EBOS is committed to placing the interests of the child at the centre of its response and remediation expectations of suppliers.

1.2. Forced, Bonded, Involuntary Labour

EBOS considers instances of forced labour, bonded labour, human trafficking, prison labour and indentured labour a critical breach of the Code and this Policy.

Employment must be freely chosen.

No worker passports or identity documents should be retained by their employer. Workers should have free and complete access to their own passport, identity documents, and residency papers at all times. Workers should have freedom of movement and not be confined to the supplier premises, including dormitories or provided housing.

Workers must not be required to lodge any form of financial deposits with their employer or head contractor and should be free to leave their employer or head contractor after a reasonable notice period. Workers shall not have wages confiscated in part or in full to pay off debt (unless that debt is lawfully owed to the employer) or unreasonable recruitment fees. All costs relating to the recruitment and placement of workers should be borne by the employer.

1.3. Harassment, Abuse or Discrimination

The use or threat of physical force, sexual violence, or intimidation of any kind is considered a critical breach of the Code and this Policy.

Every worker shall be treated with respect and dignity.

No worker shall be subject to any form of harsh or inhumane treatment including intimidation, physical, sexual, psychological or verbal harassment or abuse.

There should be no unlawful discrimination in hiring, compensation, access to training, promotions, termination or retirement based on the following grounds: a) race, b) sex; c) gender identity; d) race (including colour, nationality, descent, ethnic, ethno-religious or national origin); e) disability/impairment, including physical, mental and intellectual disability; f) breastfeeding; g) carers' responsibilities, family responsibilities, carer or parental status, being childless; h) industrial/trade union membership, non-membership or activity; i) marital status, domestic status, relationship status; j) physical features; k)

political belief, opinion, affiliation, conviction or activity; l) pregnancy (including potential pregnancy); m) profession, trade, occupation or calling; n) religious appearance or dress; and/or o) religious belief, affiliation, conviction or activity.

1.4. Wages and Benefits

Underpayment of workers' wages or benefits is considered a critical breach of the Code and this Policy.

Wages and benefits must meet, at a minimum, any applicable local laws or industry practices. Wages should be paid regularly, directly and on time.

Record keeping must be accurate and transparent.

All workers should be provided with written contracts in a language that the worker understands, with all terms and conditions, for example: hours, piece rate, overtime, pay, deductions, benefits and leave, clearly explained and including all legally required employment terms and conditions. Details of disciplinary and grievance mechanisms should also be provided.

Workers must be granted and correctly compensated for any types of paid leave and social insurance to which they are legally entitled. Examples of such leave include annual leave, maternity, parental, carer and sick leave. Employers must also cover the insurance requirements of workers consistent with local laws.

Deductions from wages may only occur with the express written permission of the worker concerned or as required by law. Worker permission must be obtained without coercion. Deductions from wages for disciplinary measures are not permitted. If the employer provides accommodation, the fees must be reasonable.

Workers should have full and complete control of any money earned. Pay should be deposited into a bank account in the worker's own name, not in the name of the employer, nor into the account of a spouse or male relative.

Outstanding payments upon termination are to be paid in full (or no later than the next payroll date). Workers must not be coerced to continue working to receive any outstanding payments.

1.5. Working Hours and Leave

Overtime must be voluntary, must not be excessive, shall not be demanded on a regular basis and must be compensated as prescribed by local laws.

Overtime shall be used reasonably, considering the extent, frequency and hours worked by individual workers and the workforce as a whole. Overtime shall not be used to replace regular employment.

Inclusive of overtime, workers must not work "excessive" hours (e.g., >60hrs) per 7-day period and must have a minimum of 1 day off per 7-day period. "Excessive" hours may occur in exceptional circumstances where all the following criteria are met:

- This is allowed by a collective agreement freely negotiated with a workers' organisation or representative.
- Appropriate safeguards are taken to protect workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

Workers should not be forced to work overtime, and disciplinary measures should not include forced overtime work, nor should there be a threat of dismissal, penalty, or involuntary repatriation in cases where workers refuse to work beyond contracted hours.

Record keeping of hours worked by all workers, including those employed via third party agents or labour providers, must be accurate, complete and transparent at all times.

1.6. Regular Employment

Where relevant work performed must be on the basis of a recognised employment relationship established through local law and practice.

Obligations to employees under labour or social security laws and regulations arising from a regular employment relationship must 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.

1.7. Migrant Workers

All workers should be treated equally.

Migrant workers should be treated equally to other workers performing the same or similar work. Migrant workers must have the same entitlements as local workers as stipulated by local law.

Migrant workers should be informed about local labour laws prior to commencement of employment.

Suppliers must ensure that each of their employees, agents, contractors have a valid right to work under applicable local laws.

1.8. Freedom of Association

Suppliers shall respect the right of workers to join or form trade unions and to bargain collectively. Workers should not be discriminated against for exercising this right.

Suppliers must adopt an open attitude towards the activities of trade unions and their organisational activities. Where the right to freedom of association and collective bargaining are restricted under local laws, suppliers will not hinder the development of alternative means of independent and free association and bargaining.

Worker representatives shall not be discriminated against and should have access to carry out their representative functions in the workplace.

2. Workplace Conditions

2.1. Health & Safety

Suppliers must provide a safe working environment and have in place processes and practices designed to mitigate risks to workers' physical and mental health in the workplace, having regard to the prevailing knowledge of the industry the supplier operates in and of any specific hazards.

Suppliers must respect the right of a worker to refuse work if the worker reasonably believes the workplace is unsafe, without suffering discrimination or loss of pay.

Adequate steps must be taken to prevent accidents and injury to workers arising out of, associated with or occurring in the course of work, by minimising so far as reasonably practicable, the causes of hazards inherent in the working environment.

Workers must receive adequate, recorded training to perform their jobs in a safe manner. It is expected that suppliers assign responsibility for health and safety to a senior management representative within their organisation.

2.2. Toilets & Facilities

Suppliers must provide safe and dignified sanitation facilities to all workers.

Workers shall have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.

Toilet facilities must be well maintained and regularly cleaned, ensuring the availability of soap or hand wash, and toilet tissue or paper. Workers must be afforded privacy and toilet stalls must be equipped with lockable doors. If female workers are employed the supplier shall provide adequate and hygienic means for napkin disposal.

2.3. Equipment

Suppliers must provide plant and systems of work that are safe and without risk to health.

Suppliers must ensure that, where required for duties, personal protective safety equipment is available, and workers are trained in its use.

Safety guards on machinery must meet or exceed local laws. Valid certifications are maintained for special machines/facilities operators (boiler operator, forklift operator, cargo lift operator etc.).

Risk areas, such as toxic substances and dangerous machinery, are identified and effectively managed by providing the applicable training and ensuring chemicals are properly stored and labelled with Material Safety Data Sheets (MSDS) and available to workers in the local language. Emergency eyewash stations and/or showers are provided where hazardous chemicals are handled and used.

Electrical equipment and wiring are properly maintained, covered/insulated to prevent exposure of wires. Electrical cords and outlets are in a safe, working condition. Electrical control panels are clearly marked, are easily accessible and unblocked at all times.

2.4. Building Structural Safety and Fire Safety

Inadequate and unsafe fire safety equipment and emergency exit facilities are considered a critical breach of the Code and this Policy.

Suppliers should ensure their facilities have all relevant permits, certificates and licences. Supplier's facilities must have an adequate number of unlocked, freely accessible and clearly marked exits for emergency evacuations, properly maintained firefighting equipment and relevant first aid equipment which is readily available.

Manufacturing facilities shall communicate fire and emergency evacuation plans and post the diagrams in the local language in various locations around the manufacturing site.

Supplier factories must conduct fire and emergency evacuation drills for all areas and shifts on an annual basis, with the presence of the local fire service and/or the civil defence authority, or as required by law.

Supplier facilities must have a fire alarm system in place that is audible throughout the entire factory. The system is inspected regularly and tested in coordination with fire drills.

3. Environmental Standards

Suppliers must comply with local environmental laws and regulations.

Suppliers must manage their waste, wastewater, and pollutants responsibly and seek to improve their environmental performance where practicable.

Where required by law, environmental records and certificates must be maintained for the manufacturing site. Hazardous materials and chemicals will be disposed in accordance with the law to ensure these materials are not discharged and do not pollute the environment.

Suppliers must have procedures in place to alert local environmental authorities in the event of accidental discharge of pollutants or for any other environmental emergency.

4. Management Controls

3.1. Sub-Contractors

Unauthorised subcontracting is considered a critical breach of the Code and this Policy.

It is an EBOS expectation that suppliers keep and maintain transparent documentation and records. Where requested by EBOS, suppliers must keep EBOS up to date at all times regarding where each product is being produced and packaged. EBOS may require a supplier to seek its' prior approval for any changes to a product manufacturing site.

Suppliers must ensure that, to the extent possible, all subcontractors, and third-party vendors providing materials or labour in the manufacture of goods ordered by EBOS comply with the Code and this Policy.

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