

Bradnams Group Sustainable Procurement Policy

Bradnams Group is committed to providing a Safe, Ethical and Sustainable workplace for all our employees and expect the same from all our business partners and suppliers.

Our goal is to partner with suppliers that demonstrate a commitment to honesty, transparent communication and continuous improvement. Suppliers that care for both their employees and the environment.

Bradnams Group regards any non-conformance of these policy requirements as unacceptable. Supply will not proceed until verifiable rectification is undertaken.

Integrity

We expect that all our business partners conduct business fairly and with integrity. Any form of Fraud, Bribery, Secret Commissions, Facilitation Payments and any other improper behaviour will not be tolerated.

Bradnams Group personnel and all its business partners must report immediately to the Bradnams CEO any actual or suspected fraud, bribery or corrupt behaviours or actions.

Fair Competition

Our business partners are expected to compete fairly and comply with all Australian Competition and Consumer Commission (ACCC) laws, as well as any local laws in other countries.

They must not enter into agreements that restrict market competition, such as price fixing, market share agreements or abuse of market dominance.

Conflict of Interest

Decisions made by Bradnams Group and business partner personnel must not be influenced by any personal or private interests. Personal or friendly relationships with Bradnams Group employees may not be used to influence the employee's business decisions.

Intellectual Property and Personal Data

Our business partners are expected to respect all intellectual property rights of both Bradnams and any other companies. Appropriate measures must be in place to prevent unauthorised disclosure or use of Bradnams intellectual property.

Personal data of Bradnams Group employees should only be used for legitimate business purposes only. Appropriate security measures must be in place to protect and personal data.

Human Rights

Our business partners must recognise the human rights of all people as defined in the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights.

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All suppliers are required to:

- Comply with all applicable laws and regulations, and international accepted standards relating to human rights, including International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. These include but are not limited to, trafficking of people, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour.
- Comply with minimum employment age limits defined by local laws in the country of employment, or the ILO convention 138, whichever is higher.
- Comply with local laws related to employment conditions for young workers and ensure that young workers are not required to work during evening and night-time hours or in hazardous conditions.
- Not use illegal labour and be able to verify the legal eligibility of their employees to work in the country of employment.
- Not use forced, bonded or involuntary labour. Work or service must not be performed under threat physical or monetary penalty, such as prison, indentured or bonded labour.
- Treat all workers with respect and dignity and ensure the workplace is free from discrimination based on gender, ethnicity, religion, disability, marital status, sexual orientation, pregnancy or political affiliation.
- Provide employee wages and benefits that meet or exceed applicable local laws and industry benchmarks. Are paid regularly and on time, and subject to accurate and transparent record keeping. Overtime is compensated and leave is given in compliance with local laws in the country of employment.
- Cascade these or equivalent requirements to their suppliers.

Environment

Our business partners must comply with all relevant environmental laws and ensure any required permits or licenses are in place and current. Be committed to the efficient use of raw materials, energy and natural resources while minimising waste and emissions, and aspire to continuous improvement to reduce their environmental footprint.

Supplier Management

Our business partners should have in place an effective supplier management policy. These or equivalent requirements should be a required of their suppliers.

Audit

Suppliers or facilities identified by Bradnam's Group as requiring an audit must, within 3 months of receiving a request either:

- Undergo a Bradnam's Group supplier compliance audit for the facilities used in the production of products, or
- Provide Bradnam's Group with evidence and all final reports of an ethical audit, conducted within the past 2 years by a qualified professional to an internationally recognised ethical audit standard.

Bradnam's Group may elect to engage a 3rd party audit firm to perform supplier compliance audits on its behalf. Reasonable access to all areas within operating facilities is expected, as well as access to documents, records and employees. Corrective actions identified during the self-assessment or audit processes must be included in an improvement plan with timeframes acceptable to Bradnam's Group.



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Compliance

We confirm that we will conform to the principles and requirements of this policy.

Company Name: _____

Company Number: _____

Authorised Company Signatory

Signatory should be the
company Director, CEO or
Senior Supply Chain Executive

Name: _____

Position: _____

Signature: _____

Date: _____