Ethical Sourcing Policy

ETHICAL SOURCING POLICY

Wormald is committed to conducting and managing our business in a manner that reflects our high ethical and moral values, and in line with community standards. We expect our suppliers to respect and adhere to the same philosophy in the operation and management of their businesses and reserve the right not to do business with suppliers that do not share and demonstrate our commitment.

Our Ethical Sourcing Policy (**Policy**) sets out our minimum requirements and expectations that all suppliers, and their (and their contractors') manufacturing facilities must comply with in order to do business with Wormald and its subsidiaries. In addition to complying with local laws and regulations, suppliers must demonstrate compliance with, and continuous improvement towards, the following standards.

1.1 Child Labour

Suppliers must comply with the minimum employment age limit defined by national law or by International Labor 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 national law.

1.2 Wages, Benefits, Working Hours and Transparent Record Keeping

Suppliers must comply with all laws regulating local wages, overtime other applicable compensation, and legally mandated benefits. Wage and benefit policies must satisfy all applicable laws and regulations. Under ordinary business circumstances, employees must not be required to work excessive working hours per week, including overtime We require that all record keeping will be strictly accurate, complete and transparent at all times.

1.3 Forced / Bonded Labour

Suppliers must not, and must ensure that their contractors do not, use any type of forced labour, which means any work or service performed involuntarily under threat of physical or other penalty, such as prison, indentured or bonded labour. Further, they shall respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment.

1.4 Discrimination

All conditions of employment must be based on an individual's ability to undertake the requirements of the role and not on the basis of personal characteristics including but not limited to gender, ethnic origin, religion or personal beliefs. Suppliers must ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.

1.5 Harassment and Abuse

Workers shall be treated with dignity and respect. In particular, Suppliers must provide a workplace free from harassment, which can take many forms including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.

© Wormald Australia Pty. Limited.

1.6 Freedom of Association

Suppliers must respect the right of employees to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country where business is conducted. Suppliers must not interfere with, obstruct or prevent legitimate activities.

1.7 Health and Safety

Conditions in all Supplier facilities, including in production and residential facilities, must be safe, clean and consistent with all applicable laws, regulations and industry best practices in order to avoid preventable work-related accidents and injuries.

a Environment

Suppliers, as a minimum, must meet all relevant environmental protection laws, and must strive to comply with international environment protection standards.

1.8 Business Integrity

Suppliers must demonstrate a high degree of professionalism and have a close affinity with our business ethics. In particular, honesty, fair dealing and the proper treatment of workers are required at all times. Bribes, favours, gifts, benefits, facilitation payments, secret commissions or similar unlawful or improper payments, in cash or kind, are strictly prohibited, whether given to obtain business or otherwise.

1.9 Compliance with the Law

Wormald requires all Suppliers to comply, and to ensure that their contractors comply, fully with the legal requirements of the countries in which they operate. All requirements in this Policy are in addition to compliance with applicable local laws.

2.0 Management Systems

Suppliers must adopt or establish a management system for all its manufacturing sites and suppliers providing materials or labour in the manufacture of goods ordered by Wormald. The management system must be designed to ensure: (a) compliance with applicable laws and regulations; (b) conformance with this Policy; (c) identification and mitigation of operational risks related to this Policy; and (d) a means of reporting any suspected or actual bribery, or improper conduct. It should also facilitate continual improvement.

2.1 Compliance with our Ethical Sourcing Policy

Wormald will monitor compliance with this Policy, and we, or our representatives, may visit Suppliers' facilities to ensure compliance with this Policy. Any violations of our Policy will be reported to the Supplier for follow up and corrective action. Suppliers are required to cooperate with the entire process. Where there are violations, or the Supplier does not demonstrate a willingness to comply, Wormald reserves the right to discontinue business with the supplier.

© Wormald Australia Pty. Limited.