

# Responsible Sourcing Policy

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## **Introduction**

Endeavour Group's purpose is to create a more sociable future together. We believe in earning our customers' trust by acting responsibly and doing the right thing for our people, our customers, our communities, and our environment. We are committed to upholding human rights, not only with respect to our own team members but also for workers in our global supply chain. This policy covers our approach to our upstream supply chain in all of our businesses and outlines our expectations for all Endeavour Suppliers in their own business and underlying supply base.

## **Our expectations**

We expect that our suppliers and our suppliers' suppliers (our upstream supply chain) are committed to the same standards as we are. Achieving this together means we must build stronger partnerships and strive to improve supply chain sustainability and the livelihood of workers within it.

Our suppliers must be able to meet our minimum expectations and have capacity to continuously improve on key responsible sourcing indicators.

We expect our suppliers to share this Responsible Sourcing Policy with their suppliers so that our expectations and standards are known and implemented at multiple supplier tiers.

We encourage our suppliers to be open and honest about the challenges they face so we can work together to find practical solutions. We are committed to continuous improvement and expect the same of our suppliers.

## **Our commitment to responsible sourcing**

Endeavour Group is an Australian company with operations in Australia and New Zealand. We have a complex global upstream supply chain, with a long standing commitment to a large number of domestic and international suppliers.

We recognise that there are a number of different legal frameworks and cultural environments that our suppliers operate in globally. We also recognise that we need to continuously monitor our responsible sourcing framework. We will formally review this policy every two years, or when circumstances dictate; for example, to align with changes in regulations or address emerging issues.

We require all suppliers with whom we have a direct relationship for goods and/or services we sell or use in our businesses to comply both with all relevant laws, rules and regulations in the countries in which they operate, and with this policy. We regularly review our supplier arrangements and we encourage our suppliers to be open and honest about the challenges they face so we can support them to find practical solutions.

We require our direct suppliers to communicate this policy to their own suppliers and extend the principles of this policy through their supply chain. We are committed to working with our suppliers to implement improvement plans and help them achieve compliance.

To support this policy, Endeavour Group has developed a set of Responsible Sourcing Policy Standards, which are outlined below.

## Policy foundations

Endeavour Group is committed to respecting the human rights of our own team members and the workers in our upstream supply chain and endorses the principles and guidance contained in the United Nations Guiding Principles on Business and Human Rights. This means we undertake due diligence activities to identify, prevent and mitigate any adverse human rights impacts derived from our internal or external operations. Endeavour Group upholds and expects our suppliers to commit to respecting each of the International Labour Organisation's (ILO) fundamental principles and rights at work. These include: the right not to be subject to forced labour, child labour or discrimination in respect of employment and occupations; and freedom of association and the right to collective bargaining.

Endeavour Group is a signatory to the United Nations Global Compact (UNGC) and this policy embraces and reflects the UNGC's core values of human rights, labour standards, the environment and business integrity.

The Responsible Sourcing Policy has been benchmarked to leading international standards. These include the following:

- International Labour Organisation (ILO)'s core conventions
- United Nations Universal Declaration of Human Rights (UDHR)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Ethical Trading Initiative (ETI)'s Base Code
- United Nations Global Compact's (UNGC) core values on human rights, labour standards, the environment and anti-corruption
- Emerging best practices from global peer programmes in various industry sectors

In line with our purpose and values, Endeavour Group is committed to the regular review of our responsible sourcing approach. Governance oversight of our approach to human rights management is provided by the Board.

## Who does this policy apply to?

This Responsible Sourcing Policy applies to all of our suppliers globally with whom we have a direct relationship for goods and/or services we sell or use in our businesses. It also applies to all workers engaged by our suppliers in providing such goods/services to us including, but not limited to, foreign migrant workers, part-time/temporary workers, female workers, young workers and old workers. Where suppliers operate in countries that have requirements and standards less stringent than our policy, suppliers are expected to uphold the standards in our policy for their business and their own supply chain.

## Contact us

If there are any questions or feedback regarding this policy or our approach to responsible sourcing, please contact us directly at: [humanrights@edg.com.au](mailto:humanrights@edg.com.au)

## Remedy and grievance mechanisms

It is important to Endeavour that effective remedies are available for affected people and communities where it is identified that our operations or those of our supply partners have caused or contributed to adverse impacts. We are committed to engaging with potentially or actually affected stakeholders, including local communities, either directly, or in collaboration with our suppliers or other third parties to provide remedy.

We recognise particular groups in our global supply chains may be disproportionately impacted. We are committed to promoting women's and children's rights as well as those of internal and foreign migrant workers in our operations and supply chain. We expect the same of our suppliers.

Endeavour is committed to ensuring channels are provided through which adversely affected people or communities can raise complaints or concerns without fear of retaliation, intimidation, harassment, discrimination or victimisation. Endeavour provides a Whistleblowing service (outlined below). We are committed to working with our suppliers to ensure appropriate mechanisms are made available within their own supply chains.

## How to report a breach of the policy

Endeavour provides a Whistleblowing service for our team members and suppliers (and their team members) as a mechanism by which responsible sourcing concerns can be raised anonymously. For more information and to report a breach of the Standards, please visit the Supplier Whistleblowing website: [www.endeavourwhistleblowing.deloitte.com.au](http://www.endeavourwhistleblowing.deloitte.com.au)

## Verification of compliance with the policy

We expect suppliers to respect and comply with the criteria set out in our Responsible Sourcing Policy and develop the necessary tools and management systems to support this compliance.

Endeavour will verify compliance to the policy. This may be in the form of a supplier self-assessment, requesting policies, procedures or records, implementing a corrective action plan, or a site visit or formal audit. Our verification and audit framework is built on recommended practises from recognised social compliance industry programs.

The type of verification or audit request will be determined by the nature of the responsible sourcing risk. Details of our approach to verification are outlined in our [Responsible Sourcing Program Supplier Guidelines](#).

## Responsible Sourcing Policy Standards

### Compliance with Local Laws

Suppliers shall comply with local laws in the countries in which they operate, along with other applicable laws, rules, and regulations. Where there is a gap between our policy and the local laws, rules and regulations, the more stringent requirements and standards apply.

#### **Applicable laws or legal requirements:**

Any reference to applicable laws or legal requirements in this means any laws (statute, legislation, ordinance, code or other law) including any regulations under them and any code of practice, rules or standards issued by relevant authorities, regulators or industry bodies, that are applicable to the supplier, its workers, its operations, the goods or services provided or the supplier's dealings with us.

Endeavour also has a strict policy on bribery and corruption. We do not tolerate, permit, or engage in any bribery, corruption, fraud or unethical practices in dealing with business partners, public officials and/or with any Endeavour Group representatives. Any offer, solicitation or acceptance of payments and gifts to Endeavour Group businesses and affiliated partners is strictly prohibited.

#### **1. Business Integrity and Ethics**

- 1.1. 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, and environmental compliance.
- 1.2. Suppliers have a valid and current business license and other documents required for legal operation, including but not limited to building safety, fire safety, and waste disposal permits.
- 1.3. There are no omissions or errors in government permits, certificates, and other facility records.

#### **2. Transparency**

- 2.1. Suppliers are transparent with their policies, processes, and records to Endeavour and affiliated partners.
- 2.2. Suppliers allow assessor(s) full access to its facility premises, workers, and records.
- 2.3. Suppliers shall not interfere with assessor(s) during the worker interview process. Suppliers shall not “coach” workers to provide false or misleading responses to questions during interviews.

- 2.4. Suppliers provide complete and accurate documents related to payroll, time attendance, and production records for the past 12 months at the minimum, or longer if available.
- 2.5. Suppliers are not hiding workers and premises (e.g. dormitories, warehouses). Subcontracting or moving production capacity to another site or worker's home is not done without written approval by Endeavour.

### **3. Bribery and Corruption**

- 3.1. Suppliers are prohibited to offer, pay, solicit, or accept bribes, including payments, gifts, or other favours intended for inappropriate business advantages to and from Endeavour, Endeavour's representatives, third-party auditing firms, customs or trade officials, sub-tier suppliers, recruiting agents, and etc.
- 3.2. Suppliers are prohibited to bribe assessors in form of any monetary compensation, gifts, or favours that may impact the outcome of the assessment.

### **4. Modern slavery**

- 4.1. Suppliers must ensure they have effective policies, procedures and systems in place to mitigate risks of modern slavery practices occurring in their own operations and supply chain.
- 4.2. Suppliers must comply with any relevant laws and regulations in relation to modern slavery and modern slavery risk management in the jurisdictions in which they operate as well as any contractual provisions relating to modern slavery as agreed with Endeavour from time to time.
- 4.3. Suppliers required to report under the Australian *Modern Slavery Act 2018* (Cth), or any other foreign modern slavery legislation (for example, the *Modern Slavery Act 2015* (UK)), must report and disclose on their actions to identify, assess and address modern slavery risks, as well as any other requirements under the relevant legislation.
- 4.4. If a supplier identifies any instances of modern slavery in their own operations or that of their suppliers', they must inform Endeavour Group as soon as reasonably practicable, provided doing so is permissible by law.

## **Management Systems**

We believe that management systems are important for suppliers to build and develop in order to support compliance requirements and sustainability goals. Suppliers are responsible to establish these management systems to support their operations.

## **5. Management Systems**

- 5.1. Suppliers appoint a senior manager or management team to be accountable for all compliance requirements in the facility or facilities.
- 5.2. Suppliers maintain a list of local law regulations and customer requirements and routinely update this list to identify and monitor changes in legal compliance.
- 5.3. Suppliers have written policies and internal procedures to oversee all aspects of compliance, including, but not limited to modern slavery, code of conduct, health and safety, environment, recruitment practices, worker welfare, etc. Suppliers communicate all policies and procedures to all workers to ensure understanding and implementation.
- 5.4. Training and training materials are provided in a language that workers understand and training records are maintained on a regular basis.
- 5.5. There is regular review and update of policy and systems (e.g. meetings with management and workers, workshops and training) with changes documented and communicated to workers.
- 5.6. Suppliers communicate this policy and its expectations to their suppliers.

## **6. Hiring, Disciplinary and Termination Practices**

- 6.1. Suppliers have a recruitment policy and/or procedure that details recruitment practices and worker expectations.
- 6.2. Suppliers conduct their own due diligence on third-party recruitment partners or agencies to ensure that worker recruitment practices are aligned with their recruitment policy.
- 6.3. Workers are not indebted or coerced to work. No workers should pay to work.
- 6.4. Workers are not required to leave deposits or identity papers (e.g. passports, visas) or bank cards with their employers.
- 6.5. Employment contracts are to be signed with a signed copy provided to each worker for their records.
- 6.6. Probationary periods must be outlined in contracts and in alignment with local law.
- 6.7. Employment contracts shall comply with applicable local laws and international standards and are written in a language that the worker understands. Employment contracts shall contain but are not limited to information on: scope of work, wage, benefits, leave, working hours, overtime, disciplinary and grievance mechanism.
- 6.8. Suppliers document and communicate with all workers a disciplinary policy with regards to escalating disciplinary action steps, workers' code of conduct, suspension and termination. A copy of this acknowledgement shall be kept in

the worker's records.

- 6.9. Managers and supervisors are trained on the disciplinary procedure and worker engagement practices.
- 6.10. Workers are informed when a disciplinary procedure has been initiated against them and have a right to participate and right to appeal without fear of reprisal during this process.
- 6.11. Suppliers maintain written records of disciplinary actions taken, including termination records as required by law.

## Social and Labour Standards

All workers shall be treated with respect and dignity. Suppliers are to provide workers with a safe place to work, and respect workers' rights to freedom of association. Worker grievances are to be heard, appropriately investigated, and any required remediable action taken, in addition to building capacity and awareness around social and labour practices.

### 7. Child Labour

Child labour refers to work that:

- Is mentally, physically, or morally harmful to children;
- Prohibits educational or social development:
  - by depriving them of the opportunity to attend school;
  - by obliging them to leave school prematurely;
  - by requiring them to attempt to combine school attendance with excessively; or
  - long and heavy work.

Child labour should not be present in Endeavour's supply chain and no child should partake in the production of goods and services in the supply chain. We rely on our suppliers and community partners to keep children in schools and other educational facilities until they reach the legal minimum age to work.

- 7.1. Suppliers maintain a written hiring policy and age verification procedure in place for the recruitment of all workers, both full-time and part-time or temporary.
- 7.2. Suppliers keep copies of official government records and/or identification papers that Verify the worker's date of birth and legal right to work. In countries where proof-of-age documents, birth certificates, or other government-issued forms of identification are not available, suppliers shall seek an independent and reliable way of determining a worker's age to verify the worker's age (e.g. education certificates, election cards, residential document, etc.)
- 7.3. Suppliers are prohibited from employing any children for work under the age of 15. However, in countries where the local minimum age is 14 in accordance to ILO Convention 138, the younger age shall apply.
- 7.4. There are no workers employed who are under the age for mandatory schooling, as required by local law.
- 7.5. Young workers (who are under the age of 18 and above the legal minimum



working age) shall not engage with any night work in accordance to ILO Convention 090.

- 7.6. Suppliers shall comply with local laws on employment of young workers. Young workers shall not engage with any hazardous work.
- 7.7. Suppliers take necessary precautions and protocols to ensure that young workers are protected from working conditions that could potentially pose harm to their health, safety, or development.
- 7.8. Suppliers comply with working hours and overtime hour restrictions for young workers as required by law and comply with minimum wage and legally entitled benefits to them.
- 7.9. Where required by law, suppliers obtain all legal approvals for all young workers. This may include but is not limited to providing health examinations for young workers prior to employment and/or on a regular basis after start of employment, as well as paying for any expenses associated with registering young workers with local authorities.
- 7.10. Suppliers encourage and allow eligible workers, especially young workers, to pursue educational opportunities.
- 7.11. Suppliers comply with all local regulations and requirements for all legal apprenticeship or vocational education programs (e.g. student workers), and maintain documentation of these programmes.
- 7.12. Suppliers with childcare facilities available to workers shall not have these facilities overlap with production areas.
- 7.13. Children are prohibited to access production areas at all times, even when the production areas are not in operation.

## **8. Forced Labour**

- 8.1. Suppliers have a written policy prohibiting all forms of forced labour, including but not limited to bonded, indentured, prison, or involuntary labour.
- 8.2. Suppliers communicate this policy to all workers and conduct training to all managers and supervisors to ensure understanding of this policy.
- 8.3. Employment is freely chosen. All workers shall have the right to enter into or terminate their employment freely without fear of retaliation, threat of physical or mental coercion, or face unlawful notice periods.
- 8.4. All overtime work shall be voluntary. Suppliers shall ensure that workers have the right to refuse overtime work without fear of retaliation or disciplinary actions.
- 8.5. Workers shall not be forced to work by a family member, associate, or friend for any reason.
- 8.6. Workers retain possession of their own original identification papers or personal things (e.g. passports, visas, ID cards, bank cards etc.).

- 8.7. Suppliers shall not subject, bind, or encourage workers to employment as a condition of fulfilling terms of debt to a third party or to the employers themselves. Personal loans to workers under circumstances where repayment terms suggest debt bondage or forced labour is strictly prohibited.
- 8.8. Workers have the freedom of leaving the workplace premise at the end of their working shifts. If entrances are guarded for safety reasons, workers shall have free access at all times.
- 8.9. Workers have the freedom of movement during working shifts to take designated breaks (e.g. bathroom, drinking water, etc.) and/or under exceptional cases where they need to take personal leave for family emergencies or illnesses, without fear of retaliation or disciplinary action.
- 8.10. Workers shall not be forcibly required to live in employer-owned or -controlled housing arrangements. For workers who live employer-owned or -controlled housing facilities, the freedom of movement shall not be unreasonably restricted.

## **9. Harassment or Abuse**

- 9.1. Suppliers shall not engage in or support any form of corporal punishment, mental or physical coercion such as sexual harassment and verbal abuse, as a means to maintaining labour discipline.
- 9.2. Suppliers educate and train supervisors and managers to prohibit the use of or threat of verbal and physical violence, including slaps, pushes, screaming, yelling, demeaning language, or verbal intimidation as a means to maintaining labour discipline.
- 9.3. Suppliers shall not subject workers to psychological or mental abuse, such as signing letters of self-criticism and publicly humiliating workers who are subjected to disciplinary measures.
- 9.4. Security practices or pat-downs shall be gender-appropriate and non-intrusive to the workers.

## **10. Non-Discrimination**

- 10.1. Suppliers treat all workers with dignity and respect.
- 10.2. Suppliers make employment decisions (e.g. recruitment and hiring, promotions, job assignments, compensation, allowances and bonuses, etc.) on the basis of a worker's education, training, demonstrated skills, and job performance.
- 10.3. Suppliers shall not discriminate against workers based on individual characteristics, race, caste, social background, disease, ethnic and national origin, religion, age, disability, gender, marital status, pregnancy, sexual orientation, political affiliation, and/or participation in worker organisations.
- 10.4. All workers have the equal opportunity for employment, promotion, training, and retirement based on their ability and job performance.

- 10.5. Suppliers shall not require pregnancy or medical testing of workers as a condition of employment.
- 10.6. Suppliers shall not make decisions on a female worker based on her pregnancy status that may result in dismissal, threats, or disadvantages in employment benefits. Pregnant workers shall not be engaged in work that creates substantial risk to themselves and their babies.

## **11. Freedom of Association and Rights to Collective Bargaining**

- 11.1. Suppliers respect the right of all workers to freedom of association and collective bargaining. No workers shall be subjected to harassment, intimidation, or retaliation in their efforts to associate or bargain collectively.
- 11.2. Suppliers adopt an open attitude towards the activities of worker representative groups and union organisations and do not interfere with or prevent these activities.
- 11.3. Suppliers shall not discriminate against union members or worker representatives by refusing to hire them or by terminating workers based on union affiliation or organising efforts.
- 11.4. Worker representatives shall be elected freely without supplier management interference.
- 11.5. Suppliers give worker representatives access to the workplace to carry out their representative functions, including access to workers and management.
- 11.6. Where a collective bargaining agreement (CBA) is in place, suppliers must adhere to the terms of the agreement. The CBA shall be negotiated freely, voluntarily, and in good faith. Suppliers shall keep all past and present CBAs on record.
- 11.7. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

## **12. Grievance Mechanisms**

- 12.1. Suppliers maintain and provide multiple grievance mechanisms (e.g. confidential suggestion boxes, hotlines, email, worker committees, designated space for worker meetings, meetings between management and worker representatives, etc.) as a way to provide confidential means for workers to raise grievances.
- 12.2. Workers are trained and aware of grievance mechanism options and understand that they can communicate without fear of retaliation, intimidation, harassment, or discrimination.
- 12.3. Suppliers maintain a resolution history of grievances raised, including evidence of communication between management and worker, and whether or not the resolution was reached.

### 13. Wages and Benefits

- 13.1. Suppliers maintain complete and accurate payroll documents and worker profiles for each worker for at least 12 months, or longer if required by law.
- 13.2. Suppliers pay the legal minimum wage for regular hours worked or the industry wage agreed within a CBA (if applicable), whichever is higher.
- 13.3. Suppliers pay workers correctly on overtime hours at premium rates as legally required or agreed within a CBA, whichever is higher.
- 13.4. All workers shall be provided with written information in a language they understand about their employment conditions including wages, incentive systems, compensation and benefits, and bonuses to which all workers are entitled to under applicable law.
- 13.5. Suppliers maintain a wage calculation example including regular hours and overtime hours (with premium). Wage calculation shall be communicated to workers and acknowledged in writing.
- 13.6. Suppliers provide workers an understandable wage statement or pay slip, which includes information on days worked, standard hourly rate or piece rate, overtime hours and premiums, bonus and all deductions, etc.
- 13.7. Suppliers pay workers in a timely manner within defined time frames. Where no timeframe limits are specified by law, payment must be paid at least within thirty (30) days.
- 13.8. Suppliers provide all legally required benefits, including all forms of paid leave (including but not limited public holidays and sick leave), to all workers.
- 13.9. Suppliers forward all withholdings to appropriate government authorities as required by law.
- 13.10. Suppliers shall not take deductions from workers' wages as a disciplinary measure or any deductions from wages not provided for by law, without written consent from the worker.
- 13.11. Workers are paid correctly for all paid time off (e.g. breaks and leaves) and work stoppages, if any, as required by law.
- 13.12. Workers have a right to refuse goods and services provided by employer, such as housing and meals. Deductions for these goods and services shall be reasonable and not exceed the actual cost to the suppliers.
- 13.13. Suppliers provide workers with all the necessary tools, personal protective equipments (PPEs), and uniforms to perform work at no charge.
- 13.14. Benefits, including but not limited to social insurance, retirement benefits, severance, maternity, etc, are paid correctly and on time, as required by law.
- 13.15. Wages for probationary workers shall not be less than the lowest wage for the equivalent job within the company.

- 13.16. Suppliers shall not change or terminate worker contracts for purposes of avoiding wage and benefit requirements.

## **14. Working Hours**

- 14.1. Suppliers keep complete time attendance records for each worker for at least 12 months, or longer if required by law.
- 14.2. Suppliers maintain and communicate a working hours policy to all workers. Workers may refuse overtime work without any fear of retaliation, disciplinary actions, or punishments.
- 14.3. Regular working hours shall not exceed 48 hours per week or allowable limits under applicable laws or CBA, whichever is stricter.
- 14.4. Overtime hours shall not exceed the legal limits or 12 hours per week (total of 60 hours), whichever is lesser. The following exceptions are allowed, if:
- Allowed by national law or CBA
  - Appropriate safety measures are implemented to protect workers
  - Suppliers can demonstrate and prove exceptional circumstances (e.g. production peaks, accidents, or emergencies)
- 14.5. Suppliers have management systems in place to monitor, determine and remediate excessive working hours to demonstrate management and control of working hours.
- 14.6. Workers are provided with at least 1 rest day for every 6 days consecutive work period or required by applicable law or CBA, whichever is stricter.
- 14.7. Suppliers provide workers with reasonable meal and rest breaks in accordance with local laws.
- 14.8. Suppliers comply with national/local laws for workers' entitlements to public and annual holidays.
- 14.9. Suppliers have a reliable system to keep accurate and complete time records.
- 14.10. Suppliers provide a functioning and reliable timekeeping system that allows workers to record their own hours (e.g. punch in, swipe card, etc.).

## **15. Health and Safety**

- 15.1. Suppliers comply with all applicable laws regarding working conditions, good housekeeping, and provide workers with a safe and hygienic workplace. Health and safety procedures shall comply with all national and local laws.
- 15.2. Suppliers have a health and safety policy and provide regular health and safety training to all workers. Training records are maintained.
- 15.3. If required by law, suppliers shall have a health and safety committee with

documented regular meetings.

- 15.4. A senior manager should be assigned to be responsible for health and safety.
- 15.5. Suppliers provide adequate and effective ventilation to allow proper circulation of air in the workplace and maintain temperature control. Windows or ventilation systems shall comply with legal requirements.
- 15.6. Suppliers provide appropriate and sufficient lighting to allow workers to see potential barriers or obstacles on their way to nearest exits, perform their jobs, and stay alert of their surroundings.
  - 15.6.1. Surrounding grounds are well lit if night work is done.
  - 15.6.2. All exit routes, including but not limited to stairways, are well lit and have handrails.
- 15.7. Production floors have proper construction, drainage, and maintenance to prevent workers from slipping.
- 15.8. There shall be sufficient number of functional and sanitary toilets in accordance with local law per floor and gender.
- 15.9. All workers have access to potable drinking water and clean water for washing.
- 15.10. Smoking is prohibited in areas where there may be fire risks.
- 15.11. Where applicable, workers shall be provided with personal protective equipment (PPE) including but not limited to masks, gloves, goggles, ear plugs, guards, and boots at no cost.
  - 15.11.1. Workers have been trained on how to properly use PPEs and their benefits, and training records are maintained.
  - 15.11.2. Suppliers monitor to ensure that workers are correctly using the provided PPEs.
- 15.12. Suppliers comply with all laws regarding machine safety and take all steps to ensure machine safety with operational safety devices or guards.
  - 15.12.1. Machines and equipment are inspected and maintained on a regular basis with records kept.
  - 15.12.2. Specialised equipment or machinery have all required and valid licenses/permits (e.g. forklifts, cargo lifts, boilers, compressors, etc.)
  - 15.12.3. Specialised equipment or machinery operators are licensed where legally required and trained in safety operating procedures.
- 15.13. First-aid kits and medical care shall be provided and available onsite at all times.
  - 15.13.1. First aid kits contain, at a minimum: bandages, cotton balls, scissors, gloves, and antiseptic wipes.
  - 15.13.2. Suppliers conduct and pay for regular occupational health checks for workers as required by local law.

- 15.13.3. Suppliers maintain functioning emergency eye wash stations or showers where corrosive chemicals or solvents are used.
- 15.14. Suppliers have a system to identify, evaluate, and minimise risk from physically demanding work to prevent work-related injuries or health impacts on workers.
- 15.15. Suppliers maintain a procedure for handling worker injury and incidents. All incidents are reported and recorded for at least 12 months or longer. Where required by law, incidents are reported to local authorities.
- 15.16. Suppliers maintain structural and building safety, and maintain all legally required building or construction certificates/reports/permits.
  - 15.16.1. Building inspections are conducted on a regular basis, or as required by local law or standard practice.
  - 15.16.2. Maximum occupancy signage is visibly posted in each room of the building, near each entrance. Maximum occupancy shall be within building permit requirements.
- 15.17. Suppliers comply with all applicable laws regarding fire safety and take measures to plan for emergencies and prevent injuries and accidents.
  - 15.17.1. Suppliers maintain all valid and legally required fire safety certificates, licenses, and inspections.
  - 15.17.2. Suppliers designate an emergency response team with defined responsibilities.
  - 15.17.3. Suppliers maintain a suitable fire detection and emergency alarm system that covers all areas of the production premise.
  - 15.17.4. Emergency alarm system is audible, functional, inspected, and tested regularly.
  - 15.17.5. Fire extinguishers shall be sufficient in numbers as required by local law and adequately labelled according to the types of fire emergencies that they are used for.
  - 15.17.6. Fire extinguishers and/or fire hoses are functional and properly mounted and secured through the workplace.
  - 15.17.7. All fire-fighting equipment, including fire extinguishers and fire hoses, is clearly marked and easily accessible with operating instructions labeled. These equipment are checked routinely with relevant logs maintained.
  - 15.17.8. Sprinkler systems meet legal requirements and are regularly maintained by licensed professional.
  - 15.17.9. There are sufficient number of emergency exits in the workplace per floor, warehouse, office, etc.
  - 15.17.10. Emergency lighting are provided with backup power and included along all exit routes, including stairways. The lighting is industrial grade and

inspected regularly. Anti-explosive lights are installed in areas in which flammable and combustible materials are stored.

- 15.17.11. Emergency exits are kept clear, unlocked, and accessible at all times and open in the direction of emergency egress. Emergency exit doors meet legal requirements.
- 15.17.12. Fire and emergency evacuation plans are posted on every floor. Evacuation plans reflect floor layout, including a “you are here” sign, and are in a language understood by workers.
- 15.17.13. Evacuation drills are conducted regularly, at least once a year or more as required by local law, whichever higher. Evacuation drills are conducted to cover all shifts, floors and buildings, and are recorded with photos and attendee list.
- 15.17.14. Designated emergency assembly points are large enough to safely accommodate all workers during emergency evacuations.
- 15.17.15. Exit routes are marked and visible during fire emergencies and kept unobstructed and clear at all times.
- 15.17.16. Workers and supervisors are trained at regular intervals in fire safety, use of fire extinguishers, and other fire prevention procedures and emergency evacuation plans. Trainings are recorded and documented.
- 15.18. Suppliers comply with legal requirements regarding electrical safety. Electrical panels, wiring, circuits, outlets etc. shall be routinely checked for integrity and marked with appropriate safety warning labels.
- 15.19. Suppliers must inform Endeavour should there be a significant and immediate risk to the health or safety of workers (e.g. flooding, fire, chemical accidents, etc).

## **16. Health and Safety: Dormitories and Canteens**

- 16.1. Suppliers have procedures for monitoring and maintaining dormitories or housing accommodations and canteens or kitchens, when provided, to be safe, hygienic, separate from production areas, and meet all related laws regarding building structural integrity, electrical safety, and fire safety.
- 16.2. Sleeping areas have clearly identifiable gender segregated options.
- 16.3. The living space per resident in the sleeping areas meet or exceed local laws or industry standards, whichever is more stringent.
- 16.4. Residents shall be provided with own mats or beds and not required to share mats with others for hygiene purposes.
- 16.5. Residents have storage space for personal possessions that can be locked.
- 16.6. Residents have free access to sufficient toilets and showers by gender according to local law or industry standard, whichever is more stringent.



- 16.7. Potable drinking water shall be provided to all workers in dormitories and canteens.
- 16.8. All kitchen and food service staff have valid health certificates as legally required.
- 16.9. Suppliers provide hygienic equipment for food storage and preparation (e.g. refrigerators).

## Environmental Standards

Suppliers are expected to comply with all applicable environmental laws and regulations, and maintain an environmental management system that identifies and manages environmental impacts.

### 17. Environment

- 17.1. Suppliers comply with national and local environmental laws and regulations.
- 17.2. Suppliers maintain an effective environmental management system that identifies environmental impacts including and not limited to water, wastewater, energy, air emissions, waste, hazardous materials, and other significant environmental risks.
- 17.3. Suppliers maintain all legally required and valid environmental permits, licenses, approvals, and other certifications.
- 17.4. Suppliers have a response plan for environmental accidents or emergencies. Where applicable, suppliers shall also include procedures for notifying local community authorities.
- 17.5. Suppliers have trained environmental personnel to handle environmental accidents or emergencies.
- 17.6. Workers are trained on first aid and emergency actions in case of environmental accidents or emergencies.
- 17.7. Suppliers shall maintain a record of environmental emergencies or accidents, along with corrective and preventative plans.
- 17.8. All monitoring reports including but not limited to air, water, and noise shall be maintained regularly per local law.
- 17.9. Suppliers maintain a wastewater treatment policy and procedure with trained staff to oversee the operation. Wastewater treatment facilities must be appropriately sized and functioning to handle effluent capacity at all times.
- 17.10. Suppliers maintain an updated chemicals inventory that lists all chemicals used onsite in conjunction with Material Safety Data Sheets (MSDS) for each chemical in the inventory.
- 17.11. Suppliers shall prohibit the use of hazardous substances listed in Zero Discharge of Hazardous Substances - Manufacturing Restricted Substances List

(ZDHC MRSL).

- 17.12. Suppliers comply with legal requirements regarding chemical management and handling, particularly hazardous substances used in the workplace.
  - 17.12.1. Chemicals and hazardous substances are properly stored (e.g. away from ignition or combustible sources and sealed properly) and labeled with appropriate identification and safety handling precautions.
  - 17.12.2. Chemical storage sites should be separate and covered, equipped with appropriate fire safety equipment, with proper ventilation, anti-explosive lights, and special PPEs for workers handling chemicals.
  - 17.12.3. Chemicals and hazardous substances are contained in secondary containment to prevent leakages, spills, and accidents. Secondary containment provides sufficient volume to store chemicals and hazardous substances.
  - 17.12.4. Suppliers separate hazardous from non-hazardous materials. Flammable and combustible materials and chemicals are safely stored away from sources of ignition.
  - 17.12.5. Workers are trained regularly to handle, clean up, and dispose of chemicals and hazardous substances. Training records are maintained.
  - 17.12.6. Gas cylinders are properly marked, used, inspected, stored, and secured.
  - 17.12.7. Expired or deregistered chemicals and used chemicals shall be properly and safely disposed of by certified third party professionals.
  - 17.12.8. If applicable, chemicals used in agriculture comply with industry standards and local law.
    - 17.12.8.1. Agrichemical applications must be recorded (e.g. where, when, dosage, climatic conditions, etc.) and available upon request.
    - 17.12.8.2. Suppliers monitor and manage runoffs to adjacent environment from workplace activities.
    - 17.12.8.3. Suppliers comply with all local resources management laws (e.g. tree clearing regulations, water usage regulations, etc.)
    - 17.12.8.4. Suppliers comply with all local laws for pest management, including large vertebrate birds or other pests according to environmental standards.
- 17.13. Suppliers have proper waste management procedures in place to carefully dispose and handle waste materials on site according to local law. Suppliers ensure that there is no illegal dumping of waste to the local environment.

## Additional Standards (If Applicable)

### 18. Overseas or Foreign Migrant Workers

Overseas or foreign migrant workers are any workers who are not a citizen or permanent resident of the country of employment and have additional requirements before being allowed to work in the country. They are often found in countries and industry sectors where the labour supply is limited and can face unique risks that make them vulnerable to exploitation.

These Additional Standards on Overseas or Foreign Migrant Workers apply if suppliers recruit, either directly or via a third party, overseas or foreign migrant workers into their business or supply chain. This includes meeting additional legal standards before workers are allowed to work in the country. The same requirements throughout this document apply to overseas or foreign migrant workers.

- 18.1. Suppliers have a management system in place to monitor and check labour hiring / recruitment agencies against legal compliance and hiring practices.
- 18.2. Suppliers communicate a clear policy to all labour hiring / recruitment agencies that no recruitment fees or other forms of payment are to be levied to workers.
- 18.3. Suppliers ensure that there were no deposits or other charges paid or services provided by workers either for their jobs or to cover other fees at the site or at their place of origin, including fees levied during termination.
- 18.4. Suppliers maintain and keep on record a signed contract with the recruiting agency. The contract shall clearly stipulate the contractor's obligation to comply with Endeavour's Responsible Sourcing Policy.
- 18.5. Workers contracts accurately reflect the agreed payment, the agreed terms in the recruitment process and are written in a language understood and signed by workers.
- 18.6. Where applicable for workers recruited overseas, all workers shall get pre-departure training in their native language and arrival training in a language they understand. Suppliers must work with third-party recruitment agencies to ensure that this requirement is met.

If foreign workers are recruited within the country, suppliers shall verify that the conditions for arrival training are met before allowing workers to commence work.

- 18.7. All training or on-boarding records shall be maintained for each worker.
- 18.8. Workers shall not have their passports, identity papers, or ATM cards retained for employment.

Exceptional cases where security is of concern, workers shall be provided with a means of personal retention. If this is not possible, suppliers must receive written permission from workers to safe-keep their documents and allow full access at all times.

- 18.9. Suppliers have an appointed individual in management, a translator who speaks

the local language of the workers or access to a similar service, to facilitate grievance resolutions.

- 18.10. Workers must be able to access and use the internal grievance mechanisms in a language they understand.

## **19. Subcontracting and Homeworkers**

- 19.1. Subcontracting is prohibited unless suppliers obtain written approval from Endeavour for any subcontracting work before it begins.

If subcontractors are approved, suppliers shall maintain appropriate records of approved subcontractors for at least 12 months or longer.

- 19.2. Homeworkers are prohibited unless suppliers obtain written approval from Endeavour.

If homeworkers are approved, suppliers shall have policies and procedures in place to control external working arrangements and working conditions, maintain a roster for all homeworkers used, ensure correct payment for homeworkers, as well as maintain all legally mandated documents as required by law.

## **20. Responsible Sourcing of Minerals**

- 20.1. Where the minerals tin, tungsten, tantalum and gold are a key component of final production, suppliers must have adequate due diligence and disclosure procedures in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

<b>Date approved:</b>	V.02 2 May 2023  By Endeavour Group Limited Board of Directors
<b>Date effective:</b>	2 May 2023
<b>Accountable:</b>	Chief Executive Officer
<b>Contact:</b>	Human rights team via:  <b>Email:</b> <a href="mailto:humanrights@edg.com.au">humanrights@edg.com.au</a>
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