

# ETHICAL SOURCING POLICY

## 1. Purpose and Commitment

This purpose of this policy is to outline the Ethical Sourcing and Labour Standards we promote, the expectations of our suppliers and contractors as part of our supply chain and our ongoing commitment to eliminate the risk of modern slavery.

At Select Harvests (SHV) we strive to engage in ethical and sustainable relationships with all people, whether they are our direct employees, or as part of our supply chain, including suppliers, third party labour hire providers, labour hire workers, contractors, customers, the community and stakeholders we engage with.

## 2. Values

Our values and behaviours are critical to our culture in delivering our 3 key strategic priorities. SHV recognises that by living the values, and treating each other with trust and respect, we all contribute to the long-term success of the business and safety of our people. Ethical sourcing drives trust into each part of our values statement. It is a visible commitment across the business to delivering effective and commercially sustainable outcomes.

Trust & Respect	Integrity & Diversity	Sustainability	Performance	Innovation
Treat all stakeholders with trust and respect	All decisions and transactions will not compromise the integrity of the organisation or individual	Our focus is on the long-term sustainability of our environment, business and community	Exceed expectations on a daily basis	Constantly challenge ourselves to improve everything

## 3. Scope of Policy

This policy applies to all divisions of SHV, including directors, management, employees, individuals, contractors, visitors and those engaged as part of SHV's supply chain, including suppliers and third-party labour hire providers.

## 4. Policy Objectives

The policy objectives are to uphold human rights, protect the environment and operate in a sustainable manner, whilst being a respected leader in our industry and communicating the same expectations of our suppliers and their supply chains.

## 5. Definitions

**Modern Slavery:** The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The *Modern Slavery Act 2018* (Cth) defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

**Supplier:** A person or organisation that provides something needed such as a product or service. This includes third party labour providers, and companies that supply us with various goods and services on either ongoing or short-term basis.

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**Third Party Labour Provider (TPLP):** An organisation or Contractor that sources people to perform work/services for a company, employs/contracts the person and then provides the person to a company to perform the work/services.

**Labour Hire Agency (LHA):** A company that employs or contracts a person to perform work or service at a company site or on behalf of a company upon request from the host employer.

**Host Employer:** A host employer uses labour hire workers supplied by a TPLP.

**Labour Hire Worker (LHW):** A person who performs work or services, but is employed or contracted by an agency, not employed or contracted directly with the host employer.

**Contractor:** An individual or company that runs their own business and contracts with the company to provide material or services. This is different from Labour Hire Agency Staff.

### 6. Ethical Sourcing

We are committed to managing the economic, environmental and social challenges across our supply chain. We believe a responsible supply chain is one that:

- Respects people, their safety and individual human rights
- Produces and manufactures safe food
- Respects the welfare of wildlife and the preservation of the environment
- Actively supports the responsible management and improvement of all resources in particular bee and water resources
- Promotes the most responsible agricultural and food manufacturing processes
- Reduces environmental impact whilst conserving scarce resources
- Ensures operating as a good citizen in our community

We achieve this by committing to:

- Employ innovative approaches to conserve resources and reduce impacts to help preserve, improve and protect the environment
- Promote responsible agricultural and food manufacturing practices
- Safeguard the quality and integrity of the food we produce, market and manufacture
- Respect people and human rights by treating our employees, suppliers, and contractors with dignity and respect and providing safe, secure and healthy work environments, and expecting the same from our supply partners

### 7. Commitment to Human Rights

SHV is one of Australia's largest almond exporters and continues to build strong relationships in the fast-growing markets of India and China, as well as maintaining established routes to markets in Asia, Europe and the Middle East. We have a complex global supply chain with a long-standing commitment to a large number of domestic and international suppliers.

Therefore, we need to pay close attention to our supply chains, especially in areas which have historically proven to:

- Outsource activities (such as transport, cleaning, waste management, etc.)
- Hire low skilled labour
- Source of raw materials/commodities

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Our commitment as a company, to ensure our people are safeguarded, treated fairly and with dignity, include:

- Maintaining clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- Developing our supply chains and suppliers by being clear regarding our expectations and standards
- Leading by example and conducting appropriate checks on all employees, third party labour providers, and suppliers
- Providing clarity on our hiring, disciplinary and termination policies
- Training Managers to remain alert and respond appropriately to indicators of slavery, listening and being approachable to employees, and raising awareness
- Providing a clear grievance process which outlines whistleblower protections
- Reviewing our Ethical Sourcing and Labour Standards as required to ensure compliance with relevant Federal and State laws

### 8. Ethical Sourcing and Labour Standards

Our Ethical Sourcing and Labour Standards are designed in accordance with our company values and legal obligations under Federal and State laws.

STANDARD	REQUIREMENTS
<p><b>Child Labour</b></p> <p><i>Child labour (defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development) is strictly not allowed to be present.</i></p>	<ul style="list-style-type: none"> <li>• Suppliers maintain a written hiring policy and age verification procedure and ensure that there are no workers employed under the local minimum age and under the age of mandatory schooling as required by law.</li> <li>• Suppliers keep copies of official government records and identification papers that verify workers' date of birth and legal right to work.</li> <li>• Young workers (under the age of 18 but above the legal minimum working age) shall not engage with any night work in accordance to ILO Convention 090.</li> <li>• Suppliers shall comply with local laws on employment of young workers. Young workers shall not engage with any hazardous work that could potentially cause harm to their health, safety, or development.</li> <li>• 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.</li> <li>• Where required by law, suppliers obtain all legal approvals for all young workers, e.g. health examinations for young workers prior to employment and/or on a regular basis after start of employment, paying for any expenses associated with registering young workers with local authorities, etc.</li> <li>• Suppliers encourage and allow eligible workers, especially young workers, to pursue educational opportunities.</li> <li>• 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.</li> <li>• Suppliers with childcare facilities available to workers shall not have these facilities overlap with production areas.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Children are prohibited to access production areas at all times, even when the production areas are not in operation.</li> </ul>
<p><b>Equal Opportunity, Bullying and Harassment</b></p> <p><i>All workers must be treated with respect and dignity and feel safe at work.</i></p> <p><i>Suppliers must not allow discrimination, harassment or bullying at the workplace.</i></p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Suppliers shall not subject workers to psychological or mental abuse.</li> <li>• Security practices or pat-downs shall be gender-appropriate and non-intrusive to the workers.</li> </ul> <p><i>(Reference – EEO, Anti-Discrimination, Harassment and Bullying Policy)</i></p>
<p><b>Forced Labour</b></p> <p><i>Forced or involuntary labour is strictly prohibited.</i></p>	<ul style="list-style-type: none"> <li>• Suppliers have a written policy prohibiting all forms of forced labour and training is provided to all workers and management to ensure understanding of this policy.</li> <li>• Employment is freely chosen. All workers have the right to enter into or terminate their employment without fear of retaliation, threat of physical or mental coercion, or face unlawful notice periods.</li> <li>• Overtime work is voluntary, and workers have the right to refuse it.</li> <li>• Workers shall not be forced to work by a family member, associate, or friend for any reason.</li> <li>• Workers retain possession of their own original identification papers or personal things (e.g. passports, visas, ID cards, bank cards, etc.). Where security is a concern and workers do not have access to a safety box, suppliers may retain the worker’s documentation if workers provide written consent and the suppliers allow workers access to these documents at all times.</li> <li>• 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 where repayment terms suggest debt bondage or forced labour is strictly prohibited.</li> <li>• 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.</li> <li>• Workers shall have the freedom to take designated breaks (e.g. bathroom, drinking water, etc.) or personal leave for family emergencies or illnesses, without fear of retaliation or disciplinary action.</li> <li>• Workers shall not be forcibly required to live in employer-owned or controlled housing arrangements. For workers who live in employer-owned or controlled housing facilities, the freedom of movement shall not be unreasonably restricted.</li> </ul>
<p><b>Freedom of Association and Right to Enterprise Bargaining</b></p>	<ul style="list-style-type: none"> <li>• Suppliers demonstrate an open attitude towards the activities of worker representative groups and union organisations and do not discriminate against, interfere with or prevent these activities.</li> </ul>

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<p><i>Workers have the right to freedom of association and may enter into collective bargaining.</i></p>	<ul style="list-style-type: none"> <li>• Collective Bargaining Agreements (CBAs) are negotiated freely, voluntarily, and in good faith.</li> <li>• Suppliers adhere to the terms of the CBAs.</li> <li>• Records are kept of all past and present CBAs.</li> <li>• 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.</li> </ul>
<p><b>Grievance Mechanisms</b></p> <p><i>Suppliers need to have multiple grievance mechanisms, train workers on their options, and keep records of any grievances raised.</i></p>	<ul style="list-style-type: none"> <li>• 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 and anonymous means for workers to raise grievances.</li> <li>• Workers are trained and aware of grievance mechanism options and understand that they can communicate without fear of retaliation, intimidation, harassment, or discrimination.</li> <li>• Suppliers maintain a resolution history of grievances raised, including evidence of communication between management and workers, and whether or not a resolution was reached.</li> </ul> <p><i>(Reference – Whistleblower Policy)</i></p>
<p><b>Health and Safety</b></p> <p><i>Health and safety is our number 1 priority, and all our suppliers, must strive to achieve a Zero Harm workplace by preventing injuries before they occur.</i></p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Suppliers have a health and safety policy and provide regular health and safety training to all workers. Training records are maintained.</li> <li>• If required by law, suppliers shall have a health and safety committee with documented regular meetings.</li> <li>• A senior manager should be assigned to be responsible for health and safety.</li> <li>• 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.</li> <li>• 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.</li> <li>• Production floors have proper construction, drainage, and maintenance to prevent workers from slipping.</li> <li>• There shall be sufficient number of functional and sanitary toilets in accordance with local law per floor and gender.</li> <li>• All workers have access to potable drinking water and clean water for washing.</li> <li>• Smoking is prohibited in areas where there may be fire risks.</li> <li>• 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.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Suppliers comply with all laws regarding machine safety and take all steps to ensure machine safety with operational safety devices or guards.</li> <li>• First-aid kits and medical care shall be available onsite at all times.</li> <li>• Suppliers have a system to identify, evaluate, and minimise risk from physically demanding work to prevent work-related injuries or health impacts on workers.</li> <li>• 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.</li> <li>• Suppliers maintain structural and building safety and maintain all legally required building or construction certificates/reports/permits.</li> <li>• Suppliers comply with all applicable laws regarding fire safety and take measures to plan for emergencies and prevent injuries and accidents.</li> </ul> <p><i>(Reference – OHS Policy and Statement)</i></p>
<p><b>Health and Safety (Accommodation)</b></p> <p><i>Dormitories and canteens need to comply with health and safety standards.</i></p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Sleeping areas have clearly identifiable gender segregated options.</li> <li>• The living space per resident in the sleeping areas meet or exceed local laws or industry standards, whichever is more stringent.</li> <li>• Residents are provided with their own mats or beds and not required to share with others for hygiene purposes.</li> <li>• Residents have lockable storage space for personal possessions.</li> <li>• Residents have free access to sufficient toilets and showers by gender according to local law or industry standard, whichever is more stringent.</li> <li>• Potable drinking water is provided to all workers in dormitories and canteens.</li> <li>• All kitchen and food service staff have valid health certificates as legally required.</li> <li>• Suppliers provide hygienic equipment for food storage and preparation (e.g. refrigerators).</li> </ul>
<p><b>Hiring, Disciplinary and Termination Practices</b></p> <p><i>Suppliers need to have a fair and unbiased recruitment process that details recruitment practices and worker expectations.</i></p>	<ul style="list-style-type: none"> <li>• Suppliers have a recruitment policy and/or procedure that details recruitment practices and worker expectations.</li> <li>• Suppliers conduct own due diligence on third-party recruitment partners or agencies to ensure that worker recruitment practices are aligned with their recruitment policy.</li> <li>• Workers are not indebted or coerced to work. No workers should pay to work.</li> <li>• Workers are not required to leave deposits or identity papers (e.g. passports, visas) or bank cards with their employers.</li> <li>• Employment contracts are to be signed with a signed copy provided to each worker for their records.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Probationary periods must be outlined in contracts and in alignment with local law.</li> <li>• 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.</li> <li>• 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.</li> <li>• Managers and supervisors are trained on the disciplinary procedure and worker engagement practices.</li> <li>• 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.</li> <li>• Suppliers maintain written records of disciplinary actions taken, including termination records as required by law.</li> </ul> <p><i>(Reference – Recruitment Policy)</i></p>
<p><b>Legal Compliance</b></p> <p><i>Suppliers must show they operate in full compliance with all applicable local and international laws, rules and regulations relating to business integrity and ethics, transparency, bribery and corruption.</i></p>	<ul style="list-style-type: none"> <li>• Suppliers have a valid and current business license and all other documents required for legal operation.</li> <li>• Suppliers are transparent with their policies and processes and allow access to all relevant records to ensure compliance including complete and accurate documents related to payroll, time attendance, and production records for the past 12 months at the minimum, or longer if available.</li> <li>• Suppliers shall not “coach” workers to provide false or misleading responses to questions during interviews.</li> <li>• Suppliers are prohibited to offer, pay, solicit, or accept bribes, including payments, gifts, or other favours intended to take advantage.</li> </ul>
<p><b>Management Systems</b></p> <p><i>Suppliers must have management systems in the form of written policies and procedures to oversee all aspects of compliance, including, but not limited to code of conduct, health and safety, recruitment practices, worker welfare and so on.</i></p>	<ul style="list-style-type: none"> <li>• Suppliers appoint a senior manager or management team to be accountable for all compliance requirements in the facility.</li> <li>• Suppliers maintain a list of local law regulations and customer requirements and routinely update this list to identify and monitor changes in legal compliance.</li> <li>• Suppliers communicate policies and procedures to all workers to ensure understanding and implementation.</li> <li>• Training and training materials are provided in a language that workers understand, and training records are maintained.</li> <li>• There is regular review and update of policies and systems (e.g. meetings with management and workers, workshops and trainings) with changes documented and communicated to workers.</li> <li>• Suppliers conduct internal audits (at least annually) to identify improvement opportunities. Audit reports are maintained and available for review.</li> </ul>

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	<p><i>(Reference – Code of Conduct, OHS Policy and Statement, Recruitment Policy)</i></p>
<p><b>Non-Discrimination</b></p> <p><i>Suppliers shall treat all workers with dignity and respect.</i></p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• All workers have the equal opportunity for employment, promotion, training, and retirement based on their ability and job performance.</li> <li>• Suppliers shall not require pregnancy or medical testing of workers as a condition of employment. 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.</li> </ul> <p><i>(Reference – Recruitment Policy, Inclusion and Diversity Policy, EEO, Anti-Discrimination, Harassment and Bullying Policy)</i></p>
<p><b>Overseas and Foreign Migrant Workers</b></p> <p><i>Overseas or foreign migrant workers (defined as workers who are not citizens or permanent residents of the country of employment) have additional requirements before being allowed to work and suppliers are expected to meet these requirements and not take advantage or exploit them.</i></p>	<ul style="list-style-type: none"> <li>• Suppliers have a management system in place to monitor and check labour hire agencies against legal compliance and hiring practices.</li> <li>• Suppliers communicate a clear policy to all labour hire agencies that no recruitment fees or other forms of payment are to be levied to workers.</li> <li>• 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.</li> <li>• Employment contracts are signed by workers and accurately reflect the agreed payment, terms and conditions, and are written in a language understood by workers.</li> <li>• 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 labour hire 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 commencing work.</li> <li>• All training or on-boarding records shall be maintained for each worker.</li> <li>• Workers shall not have their passports, identity papers, or ATM cards retained for employment. If 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 workers full access at all times.</li> <li>• Suppliers have an appointed individual in management, or a translator who speaks the local language of the workers or access to a similar service, to facilitate grievance resolutions.</li> </ul>

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<p><b>Subcontracting and Homeworkers</b></p> <p><i>Policies and procedures need to ensure fairness for subcontractors and homeworkers.</i></p>	<ul style="list-style-type: none"> <li>• Subcontracting and homeworkers are prohibited unless suppliers obtain written approval from SHV. If 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.</li> </ul>
<p><b>Wage and Benefits</b></p> <p><i>Suppliers must pay the legal minimum wage for regular hours worked or the industry wage agreed within an EBA (if applicable), whichever is higher.</i></p> <p><i>Overtime hours need to be correctly paid at premium rates as legally required or agreed within an EBA, whichever is higher.</i></p>	<ul style="list-style-type: none"> <li>• Suppliers maintain complete and accurate payroll documents and worker profiles for each worker for at least 12 months, or longer if required by law.</li> <li>• Suppliers pay the legal minimum wage, or the industry wage agreed within a (CBA) if applicable, whichever is higher.</li> <li>• Suppliers pay workers correctly on overtime hours at premium rates as legally required or agreed within a CBA, whichever is higher.</li> <li>• 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.</li> <li>• 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.</li> <li>• Suppliers provide workers a 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.</li> <li>• Workers are paid in a timely manner (if no time frame limits are specified by law, payment must be made within thirty 30 days).</li> <li>• Suppliers provide all legally required benefits, including all forms of paid leave (including but not limited public holidays and sick leave), to all workers.</li> <li>• Suppliers forward all withholdings to appropriate government authorities as required by law.</li> <li>• 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.</li> <li>• Workers are paid correctly for all paid time off (e.g. breaks and leaves) and work stoppages, if any, as required by law.</li> <li>• 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.</li> <li>• Suppliers provide workers with all the necessary tools, personal protective equipment (PPE), and uniforms to perform work at no charge.</li> <li>• Benefits, such as social insurance, retirement benefits, severance, maternity, etc., are paid correctly and on time, as required by law.</li> <li>• Wages for probationary workers are not less than the lowest wage for the equivalent job within the company.</li> <li>• Suppliers shall not change or terminate worker contracts for purposes of avoiding wage and benefit requirements.</li> </ul>

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### Working Hours

*Working hours should be in accordance with the local laws or EBA, whichever is stricter.*

- Suppliers keep complete time attendance records for each worker for at least 12 months, or longer if required by law.
- 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.
- Regular working hours shall not exceed 48 hours per week or allowable limits under applicable laws or CBA, whichever is stricter.
- Overtime hours do not exceed the legal limits or 12 hours per week (total of 60 hours), whichever is lesser, however exceptions are made if:
  - allowed by national law or CBA
  - safety measures are implemented
  - there are exceptional circumstances (e.g. production peaks, accidents or emergencies)
- Suppliers have management systems in place to monitor, determine and remediate excessive working hours to demonstrate management and control of working hours.
- 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.
- Suppliers provide workers with reasonable meal and rest breaks in accordance with local laws.
- Suppliers comply with national/local laws for workers' entitlements to public and annual holidays.
- Suppliers have a reliable system to keep accurate and complete time records.
- Suppliers provide a functioning and reliable timekeeping system that allows workers to record their own hours (e.g. punch in, swipe card, etc.).

## 9. Selection of Third Party Labour Providers (TPLPs)

Prior to selecting a TPLP, we need to identify whether it is suitable to engage an LHA or a Contractor for the work or service. LHAs provide workers to perform work or services, whereas contractors generally provide services on a contractual basis for a specified period of time.

### 9.1 Labour Hire Agencies (LHAs)

SHV ensures that all LHAs we engage with meet the following requirements:

- (a) Provide a signed SHV 'Contractor Agreement' and all required documentation to meet SHV's ethical sourcing requirements
- (b) Comply with all Federal and State legislative requirements
- (c) Comply with all SHV's relevant HR policies and procedures including the Code of Conduct, OHS Policy and Statement, EEO, Anti-Discrimination, Harassment and Bullying Policy, and any other policies as may be required and/or updated
- (d) Align with SHV's values and commitment to Ethical Sourcing and Labour Standards
- (e) Obtain insurance coverage including WorkCover, Professional Indemnity and Public Liability
- (f) Demonstrate practices of compliance in employing workers with working rights in Australia

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- (g) Provide proof of competence e.g. membership of trade/professional associations and references from previous clients
- (h) Implement a detailed candidate selection process – e.g. aptitude testing, health assessments, original or certified qualifications/certificates/licences of candidates sighted and copies kept on file, and reference checks completed to confirm suitability
- (i) Use robust payroll practices with accurate and legitimate payment to workers – e.g. tax, penalty rates, superannuation, etc.
- (j) Comply with SHV's clock in system (hand scanning technology)
- (k) Have a Safety Policy and Procedures with an open partnership with SHV to ensure safe work practices are enforced, including site safety induction with a Supervisor or Inductor as detailed in the SHV Safety Manual
- (l) Have a Drug and Alcohol Policy and testing process available

### 9.2 Contractors

Contractors are subject to the requirements listed in item 9.1, with the exception of item (j) and are required to submit accurate and reliable invoices. Prior to commencing work for SHV, Contractors are required to complete an assessment of their qualifications and safety performance through the Contractor Selection Checklist.

Verification of relevant insurances are to be a part of this evaluation. Please refer to SHV's Safety Manual, Section 9.1 for Contractor Management procedures including:

- Contractor Selection Checklist
- Emergency Contractor Use
- Contractor Induction
- Supervision and Spot Checks
- Contractor Evaluation
- Non-Conformances

### 10. Audits

As part of SHV's due diligence practices, we conduct random audits on TPLPs and Suppliers to ensure fair payment and treatment in accordance with our Ethical Sourcing and Labour Standards.

If selected for a random audit, TPLPs will be required to provide the following information to ensure correct payments are being made to Labour Hire Workers (LHWs) and Contractors:

- Pay slips
- Pay rate
- Pay rate by hours worked
- Superannuation contributions
- Penalty rates, allowances, etc.

To ensure that all LHWs and Contractors have the legal rights to work in Australia, SHV will request copies of evidence prior to commencement. It is the responsibility of the TPLPs engaged to update SHV with any changes in eligibility once the LHWs or Contractors are on site. The following will be checked to ensure eligibility to work in Australia is valid:

- Visa Expiry
- Visa Classification
- Work Restrictions

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Random supplier audits will be conducted in accordance with SHV's Supplier Audit document. Furthermore, SHV may conduct unannounced site audits of both domestic and international suppliers, which are designed to verify that suppliers are complying with our Ethical Sourcing and Labour Standards.

SHV reserves the right to request audits of any other relevant information as detailed in this policy.

### 11. Breaches

If a provider is found to have breached SHV's Contractor Agreement, policy or legislative requirements, a review with the HR Department and the respective Manager will be conducted to determine severity and whether there will be a continuation of services.

For serious breaches, contracts shall be terminated with appropriate file notes kept to ensure reoccurrence is eliminated. SHV does not condone unlawful behaviour nor engagement in unlawful activities. Furthermore, SHV does not engage with suppliers who promote slavery practices and unethical behaviour.

### 12. Remedy and Grievance Procedure

It is important to SHV that if breaches are identified, we are able to provide effective remedies to the affected people and communities where it is identified that our operations have caused or contributed to adverse impacts. The nature of these remedies may differ according to the situation and may include direct engagement with the affected people and communities, or collaboration with our suppliers, police, or other third parties.

SHV is committed to ensuring channels are provided through which adversely affected people and communities can raise complaints or concerns without fear of retaliation, intimidation, harassment, discrimination or victimization.

Anyone who wishes to report concerns or breaches of our Ethical Sourcing and Labour Standards can do so under the following options:

- Verbally or in writing to your immediate Supervisor/Manager
- Verbally or in writing to a member of the HR Department
- In writing as part of our Whistleblower Policy

If you feel unable to report to your immediate Supervisor/Manager, you can notify a member of the HR Department outlined below or send an anonymous report to our postal address:

#### **Nick van Luyt**

Human Resources and Safety Manager – Food Products

Phone: +61 3 9474 3502

Email: [nvanluyt@selectharvests.com.au](mailto:nvanluyt@selectharvests.com.au)

#### **Sandra Kitt**

Human Resources and Safety Manager – Almond Division

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## ETHICAL SOURCING POLICY

### Postal Address (for anonymous reports):

Human Resources Department  
 Select Harvests Limited  
 360 Settlement Road  
 Thomastown Vic 3074  
 Australia

### 13. Reference Material / Other Related Policies

- *Modern Slavery Act 2018* (Cth)
- ILO Convention 090
- Modern Slavery Act 2018: Draft guidance for reporting entities
- Contractor Management – Safety Manual, Section 9
- Contractor Selection Checklist – Safety Manual, Appendix 9.1
- Contractor and Labour Hire Undertakings, Select Harvests
- Supplier Audit, Select Harvests
- Labour Hire Audit Requirements Letter, Select Harvests
- Labour Hire Compliance Form, Select Harvests
- HCA000A – Code of Conduct
- HCP000 – Recruitment Policy
- HCP001 – Inclusion and Diversity Policy
- HCP008 – Workplace Fair Treatment Policy
- HCP009 – EEO, Anti-Discrimination, Harassment and Bullying Policy
- HCP028 – Whistleblower Policy
- HCP030 – Environment and Sustainability Policy
- OHSP01 – OHS Policy and Statement

### 14. Authorisation and Approval

Document Name	HCP025 – Ethical Sourcing Policy
Document Manager	General Manager – People, Safety and Sustainability
Document Department	Human Resources
Contact	HR@selectharvests.com.au
Approval Authority	Managing Director
Approval Signature	
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\*Version History can be found in “SHV Company Policy Register”