



Ingham's Supplier Code of Conduct

Purpose

Inghams is committed to robust ethical standards in all its business practices. We are on a journey to continuously improve our ethical sourcing processes and are working closely with all our suppliers to achieve this. Inghams' Supplier Code of Conduct ("Code of Conduct") therefore incorporates detailed supplier requirements to adhere to the Inghams' Procurement Policy ("Policy").

1. General Requirements

- 1.1 Suppliers must fully adhere with all local, national and international applicable laws including but not limited to those laws related to work hours, wages, labour relations, immigration and foreign labour, health, safety, animal welfare and the environment.
- 1.2 Suppliers, which includes parent, subsidiary or affiliate entities as well as all their employees (permanent, temporary, contract, agency and migrant workers), are required to comply with the principles of this Code of Conduct and the Policy. Suppliers must be able to demonstrate adherence to this Code of Conduct and the Policy and must disclose any non-conformance to Inghams as soon as they become aware of them.
- 1.3 Suppliers are expected to take responsibility for ensuring that the principles of this Code of Conduct and the Policy are achieved and maintained within their own supply chain. We aim to work with suppliers and promote solution orientated discussion that leads to continuous improvement.

2. Labour Practices / Human Rights

2.1 General

Suppliers must ensure the people working for them are treated with respect and their health, safety and basic human rights are protected and promoted.

2.2 Child Labour

- (a) Suppliers must not use child labour, nor exploit children in any way.
- (b) Suppliers must be able to verify the age of all workers, and comply with the International Labour Organization's Minimum Age Convention, 1973 (https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138).

2.3 Labour Rights

- (a) All workers must be engaged freely and without coercion or undue pressure or influence. Suppliers must ensure there is no forced, bonded or involuntary labour.
- (b) Workers must not be required to lodge deposits or their identity papers.
- (c) Workers must be free to leave their employer after reasonable notice and receive all owed salary and entitlements (as applicable).
- (d) Suppliers must comply with the International Labour Standards by the International Labour Organization.
- (e) Suppliers must comply with the Australian Modern Slavery Act 2018 (Cth) and take reasonable steps to ensure that there is no modern slavery or human trafficking in its supply chains or other parts of its business.

2.4 Living Wages

- (a) Employees paid for a standard working week meet, at a minimum, country of origin national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs and to provide some discretionary income.
- (b) All workers must be provided with written and understandable information about their employment conditions in respect to wages before they enter employment, and about the particulars of their wages for the pay period concerned each time they are paid.
- (c) Deductions from wages as a disciplinary measure must not be permitted. Deductions from wages may only occur in line with applicable laws.

2.5 Working Hours

Working hours must comply with the country of origin local and/or national laws, and where no measure exists, benchmark to the Australian National Employment Standards.

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2.6 Discrimination

- (a) Suppliers must treat all workers with respect and dignity.
- (b) Suppliers must ensure there is no discrimination based on personal attributes unrelated to job performance, such as race, colour, national extraction, social origin, age, sex, gender identity, sexual orientation, physical or mental disability, relationship status, religion, political opinion, pregnancy, breastfeeding, family or carer's responsibilities, union membership or political affiliation.
- (c) Suppliers should have an equal opportunity employment policy that promotes gender equality in employment practices, and states maternity leave provision and support for childcare where appropriate.

2.7 Harassment, Abuse and Harsh or Inhumane Treatment

- (a) Suppliers must commit to a workplace free of harassment and abuse. Suppliers must not tolerate any form or threat of physical, sexual or verbal abuse, corporal punishment, mental coercion, physical coercion or other forms of intimidation.
- (b) Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.
- (c) Suppliers must prohibit harassment and unlawful discrimination in the workplace.
- (d) Suppliers should provide training to workers on - preventing and dealing with discrimination and harassment.

2.8 Illegal Labour

- (a) Suppliers must not use illegal labour and must ensure that all of their employees have the relevant legal entitlement to work in the country of employment in accordance with local or national laws.
- (b) Suppliers must have a process that enables them to ensure that all of their employees are documented and have a right to work legally in the country of employment.

2.9 Freedom of Association

- (a) Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively, without prior authorisation from suppliers' management, according to national law.
- (b) Suppliers are required to adopt an open attitude towards the activities of trade unions and their organisational activities.
- (c) Workers' representatives or trade union members are not discriminated against because of their membership of, or affiliation with, a trade union, or their legitimate trade union activity, in accordance with international labour standards.
- (d) Suppliers must give workers' representatives access to the workplace in order to carry out their representative functions, in accordance with country of origin local or national law and international labour standards.
- (e) Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment.

2.10 Safe and Hygienic Working Conditions

- (a) Suppliers will provide workers with a safe and clean working environment taking into consideration the prevailing knowledge of the industry and of any specific hazards.
- (b) Workers must have access to clean toilet facilities, potable water and where appropriate sanitary facilities for food preparation and storage.
- (c) If accommodation is provided by Suppliers to their workers, it must be clean, safe and meet the basic needs of workers and accommodation arrangements must not restrict workers' freedom of movement or of association.
- (d) Suppliers must provide appropriate and effective personal protective clothing and equipment to their workers where required and ensure workers are trained in its use.
- (e) Safeguards on machinery must meet or exceed local laws.
- (f) The responsibility of health and safety must be assigned to a senior management representative and the representative must carry out regular risk assessments.
- (g) Suppliers must provide access to adequate medical assistance and facilities.
- (h) Suppliers must ensure that all of their workplaces have an effective fire safety management system in place. Suppliers must provide adequate safeguards against fire, and must ensure the strength, stability and safety of buildings and equipment, including residential facilities where provided.

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2.11 Disciplinary Procedures

- (a) Suppliers must establish written disciplinary procedures and must explain them in clear and understandable terms to their workers. All disciplinary actions and performance management actions must be recorded and explained to workers.
- (b) Workers must have the right to a support person, which may include a trade union representative, at disciplinary action which may lead to significant disciplinary penalties or dismissal.

2.12 Workplace Grievances

Suppliers must provide or be working towards implementing a grievance mechanism for workers (and their organisations, where they exist) to raise workplace concerns. This grievance mechanism must involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism must also allow for anonymous complaints to be raised and addressed. The existence and scope of this mechanism must be clearly communicated to all workers and their representatives, and all workers must have equal access.

2.13 Regular Employment

- (a) To every extent possible, work performed must be on the basis of recognised employment relationship established through country of origin national law and practice, and international labour standards.
- (b) All directly engaged employees must be provided with written and understandable information about their employment conditions, including wages, hours and holidays, before they enter into employment, and about details of their wages for the pay period concerned each time they are paid.
- (c) Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship must not be avoided through the use of labour-only contracting, sub-contracting or home-working arrangements, or through apprenticeships schemes where there is no real intent to impart skills or provide regular employment, nor must any such obligations be avoided through the excessive use of fixed-term contracts of employment.

2.14 Agency / Indirectly Employed Workers

- (a) Suppliers must have due diligence processes in place to ensure that workers on their site do not pay any form of recruitment fees to any agents to gain employment.
- (b) Suppliers are responsible for the rights of all workers on their site whether they are directly employed or employed or engaged through a labour provider, agent or a contractor.
- (c) Suppliers must have a process to ensure that they have a record of all workers working at their site including those engaged through an agency, labour provider or contractor within three days of beginning employment or being on site.
- (d) Suppliers must meet any local laws relating to the use of agency / labour provider workers including to workers at their own suppliers and subcontractors, and to workers supplied by agencies, for example by including these standards in contractual or procedural agreements with third party employers.
- (e) Suppliers must have a clear written agreement with their labour provider to ensure that the welfare of workers is safeguarded (including their health and safety, payment and benefits terms, accommodation, non-discrimination), and must monitor adherence to this agreement.

3. Business Integrity

- 3.1 Suppliers must engage in professional and transparent business ethics in all dealings.
- 3.2 Bribes, favours, benefits, or any other similar improper payments, and the dishonest or partial use of power or position which results in a person/group being advantaged is prohibited.
- 3.3 Suppliers must not offer/give to, or receive from, Inghams' staff or agents or contractors working on Inghams' behalf, any gift or other benefit that could be considered a bribe.
- 3.4 Suppliers must accurately record and disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable laws and regulations and prevailing industry practices.
- 3.5 Suppliers are expected to engage with the Inghams' ethical trading programme and be open to audits, visits and training programmes, including worker interviews as required.
- 3.6 Suppliers must avoid conflicts of interest.



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4. Environment

- 4.1 Suppliers must have a commitment to protect the environment and be able to demonstrate continuous environmental improvement.
- 4.2 Suppliers must identify and document key environmental impacts and implement controls to minimise or eliminate the impact on the environment, including but not limited to:
 - (a) pollution;
 - (b) water, energy and material conservation; and
 - (c) reduce, reuse, recycle or recover.
- 4.3 Suppliers must have or be working towards an environmental management plan.
- 4.4 Suppliers must train employees of the potential environmental impacts of their actions.

5. Animal Welfare

- 5.1 Minimum industry guidelines must be enforced.
- 5.2 Suppliers must ensure that the principles of the five freedoms of animal welfare are met:
 - (a) freedom from hunger and thirst, by ready access to fresh water and a diet to maintain full health and vigour;
 - (b) freedom from discomfort, by providing an appropriate environment including shelter and a comfortable resting area;
 - (c) freedom from pain, injury or disease, by prevention through rapid diagnosis and treatment;
 - (d) freedom to express normal behaviour, by providing sufficient space, proper facilities and company of the animal's own kind; and
 - (e) freedom from fear and distress, by ensuring conditions and treatment which avoid mental suffering.

Supplier Support

Ingham's understand that suppliers may need support, guidance, or time in meeting the principles set out in this Code of Conduct and the Policy. We aim to work with suppliers and are committed to open and constructive communication to ensure the principles of this Code of Conduct are met. However, ongoing non-conformance may lead to the supplier no longer qualifying as a supplier of Inghams.

If you are an existing or prospective supplier with questions, comments, or any concerns about this Code of Conduct please write to us at: ethicalsourcing@ingham.com.au.

References

Inghams Modern Slavery Statement <https://investors.ingham.com.au/Resources/files/FY21%20Inghams%20Modern%20Slavery%20Statement.pdf>
Fairwork Australia <https://www.fairwork.gov.au/>
Five Freedoms http://kb.rspca.org.au/Five-freedoms-for-animals_318.html
Ethical Trading Initiative Base Code <https://www.ethicaltrade.org/eti-base-code>
Global Social Compliance Programme https://www.theconsumergoodsforum.com/wp-content/uploads/2018/01/GSCP_Reference_Tools_RC_interactive.pdf
Modern Slavery Act 2018 (Cth) <https://www.legislation.gov.au/Details/C2018A00153>
Sedex Supplier Workbook <https://www.sedexglobal.com/sedex-supplier-workbook/>
UN Universal Declaration of Human Rights <http://www.un.org/en/universal-declaration-human-rights/>
ILO Declaration on Fundamental Principles and Rights at Work <http://www.ilo.org/declaration/lang--en/index.htm>
UN Guiding Principles on Business and Human Rights <https://www.unglobalcompact.org/>
UN Women's Empowerment Principles <http://weprinciples.org/Site/PrincipleOverview/>
UN Human Right to Water and Sanitation https://www.unwater.org/app/uploads/2018/10/WaterFacts_water_and_human_rights_sep2018.pdf
Children's Rights and Business Principles <http://childrenandbusiness.org/>
UN Global Compact <https://www.unglobalcompact.org/what-is-gc/mission/principles>