

Under Raps Pty Ltd

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Ethical Sourcing Policy

UnderRaps Pty Ltd t/a Intercept Australia is committed to sourcing products in an ethical and responsible manner, and considers the welfare of workers, health and safety and potential environmental impacts. The UnderRaps Pty Ltd t/a Intercept Australia Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions.

1. Policy Requirements

- 1.1. All suppliers are required to agree to the principles in the Ethical Sourcing Policy.
- 1.2. If suppliers are unable to demonstrate compliance with the Ethical Sourcing Policy, UnderRaps Pty Ltd t/a Intercept Australia reserves the right to terminate any supply agreement.
- 1.3. Suppliers must complete an 24month annual self-assessment and UnderRaps Pty Ltd t/a Intercept Australia may, at its discretion, require an independent audit, at the supplier's expense, of compliance with this policy.

2. Legal Requirements

- 2.1. All suppliers must fully comply with all local laws and regulations regarding labour, health, safety, and the environment. Suppliers must also fully comply with the legal requirements of the countries in which they operate in addition to all elements of this Ethical Sourcing Policy.

3. Forced/ Bonded Labour

- 3.1. Suppliers must not use Forced, Bonded or Involuntary Labour.
- 3.2. Employment must be freely chosen.
- 3.3. Workers must not be required to lodge deposits or identity papers with suppliers.
- 3.4. Workers must be free to leave their employment after reasonable notice, not more than 1 month, has been given.

4. Child Labour

- 4.1. Suppliers must not use child labour. Child labour is defined as work that deprives children of their childhood, the opportunity to attend school and fulfil their potential, or that is harmful to their physical and mental development.
- 4.2. Suppliers must be able to verify the age of all employees to ensure no child labour is used. UnderRaps Pty Ltd t/a Intercept Australia refers to the International Labour Organization's Minimum Age Convention, 1973 (No. 138), where the minimum age for work is defined as being below the age for finishing compulsory schooling, and in any case not less than 15 years of age.

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5. Illegal Labour

5.1. Suppliers must not use Illegal Labour.

5.2. Suppliers must be able to verify the legal entitlement of their employees to work in the country of employment.

6. Harsh or Inhumane Treatment

6.1. Physical abuse or physical discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.

7. Business Integrity

7.1. Suppliers must engage professional business ethics in all dealings and provide transparent documentation and records.

7.2. Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise.

8. Wages and Benefits

8.1. Wages and benefits paid for a standard working week must meet as a minimum national or industry standards, whichever is the higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.

8.2. 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 that they are paid.

8.3. Deductions from wages may only occur with the express written permission of the worker concerned.

8.4. Deductions from wages for disciplinary measures are not permitted.

9. Working Hours

9.1. Including any overtime, workers must not work above the maximum hours per week or per month as stipulated by local laws, or where local laws do not exist, a total of 50 hours per week.

9.2. Workers must have at least one day off in 7 days or two days off in every 14 days.

9.3. Overtime must be voluntary and compensated as prescribed by local laws.

9.4. Record keeping on hours worked must be accurate, complete and transparent at all times.

10. Freedom of Association

10.1. Suppliers acknowledge that workers have a right to freedom of association and to bargain collectively.

10.2. Workers have a right to join or form trade unions of their choosing. Suppliers are required to adopt an open attitude towards the activities of trade unions and their organisations activities.

10.3. Where the right to freedom of association and collective bargaining are restricted under local laws, suppliers will not hinder the development of alternative means of independent and free association and bargaining.

11. Sub-Contracting and Supply Chain

11.1. There must be no sub-contracting unless documented and available for review by UnderRaps Pty Ltd t/a Intercept Australia or an independent auditor, including but not limited to records of subcontractors' names and locations. UnderRaps Pty Ltd t/a Intercept Australia considers sub-contracting to mean:

- i) Sites contracted by UnderRaps Pty Ltd t/a Intercept Australia direct suppliers to produce product in its final form for retail sale, packed in the retail unit, or produced in bulk in final form for retail packing elsewhere, or received in bulk final form for retail packing.
- ii) Sites that significantly contribute to the final form of the product.

11.2. Suppliers must have adequate policies and processes in place for properly managing subcontracting, to ensure that subcontractors operate in accordance with applicable laws, regulations and the Ethical Sourcing Policy.

12. Safe Working Conditions

12.1. Plant and systems of work which are safe and without risk to health will be provided.

12.2. 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.

12.3. Workers must receive adequate, recorded training to perform their jobs in a safe manner.

12.4. Personal protective equipment must be supplied, and workers trained in its use.

12.5. Safeguards on machinery must meet or exceed local laws.

12.6. Where suppliers provide worker accommodation, it must be clean, safe and meet the basic needs of workers.

12.7. Workers must have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.

13. Discrimination

13.1. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

14. Regular Employment

14.1. To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

14.2. Employees who have a regular employment relationship with their employer are afforded a number of obligations from their employer relating to labour and social security laws and regulations. These obligations shall not be avoided through the use of labour-only contracting, sub-contracting, home-working arrangements, fixed term contracts or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

15. Environment

15.1. Suppliers must comply with local and national environmental laws and regulations.

15.2. Suppliers must use reasonable endeavours to comply with international standards on environmental protection.

16. Documentation and Policies

16.1. Appropriate documentation is in place to ensure effective ethical management practices.
