

APG & Co Supplier Code of Conduct

This APG & Co Supplier Code of Conduct (Code) sets out the **minimum standards of ethical and responsible behaviour** that APG & Co expects from its suppliers and business partners. It is based on International Labour Organization (ILO) standards, national legislative requirements and accepted best business practice.

This Code sets out **fundamental requirements** for all our suppliers and business partners (including all authorised sub-contractors or raw materials suppliers). The requirements of this Code, in conjunction the APG & Co Global Sourcing Principles, **MUST be satisfied** if you supply goods and/or services to APG & Co.

If you require a **translation of this Code** into another language or further information about the requirements of this Code, please contact us at contactus@apgandco.com.

Be aware that we will work with our suppliers to support any improvements they need to take to meet the requirements of this Code, but that we will also take action, which may involve cancelling agreements and ceasing to trade, if suppliers are not prepared to make appropriate changes and adhere to this Code.

APG & Co aims to support and work proactively with our suppliers and business partners to ensure legal compliance and promote best practice within our business and supply chains. Please contact us to discuss the requirements of this Code at any time.

ALL SUPPLIERS TO APG & CO MUST:

1. APPLICATION OF THIS CODE

- **Read, understand and adhere** to this Code and the APG & Co Global Sourcing Principles.

2. TRANSPARENCY

- Be working towards full traceability in relation to their relevant supply chains, goods, services or raw materials, and understand that as part of the supplier approval process APG & Co may require evidence of social audit assessment. APG & Co also reserves the right to request provision of manufacturing sources, certifications, memberships and other evidence from its suppliers or conduct unannounced audit visits by an independent officer to facilities producing goods for APG & Co.

3. RECRUITMENT AND EMPLOYMENT TERMS

- Ensure all workers have secure employment, that their rights are safeguarded under relevant local and international labour laws, and that they are provided with legible information in accessible language about their employment conditions.
- Not confiscate, destroy, withhold or otherwise deny workers' access to their identity or immigration documents, nor charge workers any fees or costs for recruitment.

4. WORKING CONDITIONS

- Provide a safe and healthy work environment to all workers in accordance with relevant laws, and have workplace measures or procedures in place to identify and mitigate risks of harm, injury or other negative impacts to workers.
- Ensure all workers have unrestricted access to basic necessities such as clean drinking water and toilets, and ensure workers' freedom of movement is not restricted.

5. WAGES AND PAYMENTS TO WORKERS

- Ensure all workers are paid a fair wage for the region in which they work (minimum wage required by law plus legally mandated benefits), ensure said wage reflects the experience and qualifications of the worker, and that wages are reviewed and improved over time.
- Pay worker wages and benefits regularly and on time without delaying, deferring, withholding reducing or forcing workers into debt bondage.

7. WORKING HOURS

- Ensure hours of work comply with applicable local laws. Where the law is silent, normal working hours shall not exceed 48 hours per week, and total working hours including overtime shall not exceed 60 hours per week.
- Take steps to ensure overtime shall be purely voluntary and compensated in accordance with applicable laws, and that no worker is threatened with overtime work
- Ensure adequate provision of days off in accordance with local or national laws.

8. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

- Recognise and respect the right of workers to freedom of association and collective bargaining and ensure all workers, without exception, have the right to join or form a trade union of their own choosing and to bargain collectively.

9. DISCRIMINATION, HARASSMENT OR ABUSE

- Not discriminate in hiring, remuneration, access to training, promotion, termination, or retirement on the basis of race, gender, religion, age, disability, sexual orientation, nationality, political opinion, social groups or ethnic origin.
- Ensure workers are not subjected to physical, sexual, verbal or psychological abuse
- Ensure temporary or migrant workers are afforded the same rights and conditions of work as country nationals

10. MODERN SLAVERY

- Take all steps necessary to ensure that, in all of the supplier's (and authorised sub-contractors') operations and supply chains, there is no slavery or forced servitude of any kind. This includes trafficking in persons; forced, compulsory, bonded, indentured or prison labour; debt bondage; child labour or labour facilitated through coercion or deception.
- Not employ persons under the age of 15 years or under the age of completion of compulsory education, and adhere to legal limitations for the employment of persons under the age of 18
- Ensure that any worker can submit a grievance without suffering any prejudice or retaliation.

11. OUTSOURCING OF PRODUCTION OR SERVICES

- Not engage in out-sourcing of agreed production or services unless authorised by APG & Co, and understand that APG & Co will not under any circumstances accept goods or services from a non-approved sub-contractor
- Ensure that any business partners used for outsourcing of production, services or supply of raw materials retain information and documentation to allow verification and compliance with all aspects of this Code and APG & Co's Global Sourcing Principles.

12. CONSUMER LAW AND MANDATORY STANDARDS

- Ensure that all products supplied to APG & Co comply with consumer laws and conform to all applicable Mandatory Safety and Information Standards in force under Australian Consumer Law and the New Zealand Fair Trading Act.
- Ensure that all representations and claims made in relation to any products supplied are not false or misleading and are able to be substantiated with verifiable evidence.

13. BRIBERY AND CORRUPTION

- Not take part in activities or dealings which constitute bribery or corruption, nor accept improper payments or gifts in conducting business on behalf of APG & Co, and declare any conflict of interest in business dealings with APG & Co

- Not engage in any APG & Co related business practice that results in any unauthorised personal benefit, receipt of discounts, carrying on of a personal business, fraud, conflict of interest, deception or misuse of a position.

14. ENVIRONMENT

- Take steps to protect long-term ecosystem health by preventing harm to the environment. This includes managing factory waste and emissions, water usage, treatment of wastewater, and safe labelling and storing of hazardous products.
- Adhere to all local and national environmental responsibility and sustainability regulations for manufacturing
- Not use any hazardous or toxic substances during any of the production processes used in the manufacture or supply of products and services for APG & Co.

15. ANIMAL WELFARE

- Take steps to prevent harm to animals and not conduct animal testing in the manufacture of products or provision of services for APG & Co.
Not use any wool or animal hair products from mulesed sheep in the manufacture of products for APG & Co and take steps to ensure all facilities producing wool, hair, down or other animal materials for APG & Co meet the 'Five Freedoms' requirements in relation to treatment of animals and are third-party verified by a humane certification program.

16. RESTRICTED PRODUCTS AND RAW MATERIALS

- Not use real animal fur/raw materials from any animal species on the CITES or IUCN red list
- Take steps to prevent the use of cotton from the Xinjiang region, or any region where there is an increased risk of human rights abuses, in any APG & Co product.
- Not use any of the harmful substances outlined in clause 10.3 of APG & Co's Global Sourcing Principles, and keep full records relating to use of azo dyes, chlorinated phenols or formaldehyde in the manufacture of products for APG & Co.

17. CONFIDENTIALITY

- Ensure that APG & Co's confidential information, know-how and intellectual property is respected and safeguarded, and that any information not in the public domain is deemed confidential and it is only to be used for its intended purpose.

APG & CO SUPPLIER COMMITMENT

As a supplier and/or business partner to APG & Co I/we:

- understand that APG & Co is focussed on continuously working to promote best practice within its business and supply chains, is committed to going beyond compliance with our basic legal requirements, and aims to be an industry leader in ethics, transparency and responsible business dealings;
- confirm that we have read, understood and will adhere to the *APG & Co Supplier Code of Conduct* (the Code) and the attached *Global Sourcing Principles*;
- commit to complying with the fundamental requirements as outlined in Code and to take whatever steps are required to implement them into our supply chains and operations;
- understand that a failure to comply with the Code may result in the termination of our agreement to supply of goods and/or services to APG & Co; and
- recognise that the Code is drafted in the English language, and that where there are other versions of the document, that the English version will prevail in any case of discrepancy.

Agent/Supplier Signature:

Agent/Supplier Name:

Signatory Name:

Title of Signatory:

Signature and Date:

Company Stamp/ Chop

Factory Signature:

Factory Name:

Signatory Name:

Title of Signatory:

Signature and Date:

Company Stamp/ Chop