



## **ETHICAL TRADING POLICY**

PurePac Limited recognises the responsibility that we share with our suppliers to source products in an ethical manner. We want our customers to be confident that people are treated fairly, are not exploited and are not exposed to unsafe working conditions. Our Ethical Trading Policy requires all our suppliers to comply with our ethical code which is based on the International Labour Organisation (ILO) and national and international laws.

### **Commitment to Ethical Trading**

We recognise the need to communicate our commitment to key stakeholders including suppliers and the people who work with our suppliers. We seek to develop long term relationships with our suppliers who share our ethical standards. These relationships are based on the principle of fair, open and honest dealings at all times. Only suppliers that share our standards and can demonstrate compliance will be considered appropriate to trade with.

### **Improvement**

We encourage and support continuous improvement in supplier standards and we regularly measure supplier improvement. We recognise our suppliers may need time and support to ensure compliance, however, all our suppliers must demonstrate that any breach of our ETC is addressed in appropriate timescales. Where we are alerted to breaches of our ETC we will take action considered appropriate. We will work with suppliers to resolve ethical trading issues. If suppliers are unable or unwilling to address critical issues associated with any breach of our ETC within the required timescales, we reserve the right to terminate the relationship in accordance with our contractual rights.

### **Transparency**

We will strive to be open and honest when we work with others and ensure reporting is fair and transparent.

## **Ethical Trading Code**

Suppliers shall at all times comply with this code and with the applicable national and international laws, regulations, codes and standards, both in the country in which the supplier works and in the country in which the product and/or services are sourced/provided. Suppliers shall ensure, as far as is reasonably practicable, that their suppliers, agent(s), subcontractors and consultants, who are directly or indirectly involved in the provision of goods and/or services to PurePac Limited comply with the code.

Suppliers shall ensure:

### **Employment is freely chosen**

There is no forced, bonded or involuntary prison labour.

Workers are not required to lodge monetary deposits or their identity papers and are free to leave their employment after reasonable notice.

### **Working conditions are safe and hygienic**

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of industry and of any specific hazards.

Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as reasonably practicable the causes of hazards inherent in the working environments.

Workers shall receive regular recorded health and safety training.

Workers are provided with access to clean toilet facilities and to safe drinking water, and, if appropriate sanitary facilities for food storage shall be provided.

A Senior Management Representative is responsible for Health and Safety.

### **Child labour shall not be used**

There shall be no use of child labour.

Young persons under 18 shall not be employed at night or in hazardous conditions.

These policies and procedures relating to Child Labour shall conform to the provisions of the relevant International Labour Organisation (ILO) Standards.

### **Remuneration**

Salaries and benefits paid for a standard working week meet, at a minimum, national legal or industry benchmark standards, whichever is higher.

All workers shall be provided with written and understandable information about their employment conditions including information with respect to salaries before they enter employment, and about the particulars of their salaries for the pay period concerned each time they are paid.

Deductions from salaries as a disciplinary measure shall not be permitted.

All disciplinary measures to be recorded.

### **Working hours are not excessive**

Working hours must comply with national laws and the provisions defined in the clauses below, whichever affords the greater protection for workers.

Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, the frequency and hours worked by individual workers and the workforce as a whole. Overtime shall always be compensated at a premium rate.

### **No discrimination is practised**

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

### **Regular employment is provided**

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

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting and home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed- term contracts of employment.

### **No harsh or inhumane treatment is allowed**

Suppliers provide a workplace in which any form of harassment is unacceptable. Examples include physical abuse or discipline, the threat of physical abuse or sexual or other harassment and verbal abuse or other forms of intimidations.

**Entitlement to work**

Only workers with a legal right to work in the country are employed.

For both workers and agency workers, original documents are reviewed and then returned to workers to verify the right to work.

**Labour Providers**

Labour providers only supply workers registered with them.

Relationships with labour providers is covered by a Service Level Agreement which meets all national legal requirements.

Labour providers are to be audited on a regular basis to ensure compliance with national requirements/legislation.