



## Supplier Code of Conduct

Swannдри New Zealand is committed to creating quality products, without compromising our people or the planet. Our products stand the test of time, and we are committed to conducting our business responsibly. Our supply chain partners are part of our journey, and we expect each of them to demonstrate social compliance practices that address the general wellbeing of employees, as well as meeting and / or improving upon key environmental standards.

Swannдри New Zealand Limited's Supplier Code of Conduct seeks to further align its supply chain to the conventions of the International Labour Organisation, and the standards set out by the Ethical Trading Initiative, and the United Nations Global Compact. The Code sets out the minimum requirements that our suppliers are expected to adhere to, and to which they will be held accountable through the company's multi-level relationships and the ongoing development of its management practices. The Code applies to all factories, agents, sub-contractors, and material/component suppliers who make or supply any products/services to Swannдри New Zealand.

Ultimately, we hope that this will help to ensure that ethical standards are upheld and improved within the entire industry over time.

### **BUSINESS INTEGRITY**

- **Legal Requirements** - *compliance with the law*
  - All suppliers, at a minimum, are to comply with all relevant local and national laws and regulations in which they operate.
- **Anti-Corruption and Bribery** - *corruption and bribery shall not be used*
  - The use of bribery or any other practice that is unlawful or encourages non-compliance is prohibited.
  - The offering, paying, soliciting or accepting of bribes including facilitation payments is strictly prohibited.
  - Suppliers are to introduce an anti-bribery and anti-corruption policy in all areas of business, with which compliance is expected.
- **Governance** - *management of this code*
  - Suppliers must agree that representatives from Swannдри, or an organisation nominated by Swannдри may conduct visits to the suppliers' and its subcontractors' production facilities to monitor standards specified in this Code, and will be allowed unrestricted access, the right to review any employee time and wage records maintained by employers and to interview employees.
  - Suppliers must make sure that the Code of Conduct is read and understood by all workers in their facility, and is viewable at all times by all employees. Regular checks and clear records are to be kept to monitor compliance – at least once annually.

### **LABOUR PRINCIPLES**

- **Child Labour** – *under age labour shall not be used*
  - Suppliers will not employ persons under the age of 16 years old.
  - If the legal age for employment is higher than 16, then the higher age shall apply.
  - Refer to the *Swannдри No Child Labour Policy*
- **Voluntary Labour** – *employment is freely chosen*
  - There shall be no forced, bonded or involuntary prison labour.
  - Forced labour includes the use of prison labour, indentured labour, bonded labour, or any labour obtained through human trafficking or slavery.
  - All work must be conducted on a voluntary basis.
  - Workers shall not be required to lodge "deposits" or their identity papers with their employer
  - Workers shall be free to leave their employer after reasonable notice.
- **Health & Safety** – *working conditions are safe & hygienic*

Employers will:

  - Provide a safe & hygienic work environment.
  - Provide ongoing training and adequate equipment to ensure workplace safety.
  - A safe and healthy workplace should include; adequate provision of light, heat and ventilation, fire extinguishers and fire exits, access to safe drinking water, clean food preparation facilities, and sanitary washing facilities. Suppliers should provide personal protective gear to all workers.
  - Documented assessment of all risks and hazards in the facility that may impact the health and safety of the workers shall be conducted regularly. Health and safety risks to include are; risk of exposure to noise, dust, chemicals, fire, machinery, equipment, electrocution and the structural integrity of the facility.
  - Provide safe and healthy housing (where residential housing is provided for workers).
- **Working Hours** – *working hours are not excessive*

- Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
  - The total hours worked in any 7-day period shall not exceed 60 hours unless there are exceptional circumstances, but providing this is allowed by national law; this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; appropriate safeguards are taken to protect the workers' health and safety; and the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
  - Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.
  - All overtime should be voluntary and shall not exceed 12 hours per week, and compensated at a premium rate.
- **Wages & Benefits** – *workers are paid a living wage.*
    - Swannndri believes that every person should earn a 'living' wage.
    - A 'living' wage is defined as a wage that meets the basic needs of workers, such as nutritious food, housing, healthcare, clothing, transportation, energy, water, childcare, education, and also provides some discretionary income.
    - Employees shall be paid at least the minimum wage required by local law, and paid in full and on time, and are provided with all other legally mandated benefits.
    - Any overtime work must be paid at a premium rate.
    - Any deductions from wages as a disciplinary measure will not be permitted, without the expressed permission of the worker concerned.
- **Regular Employment** - *all workers have continuous employment*
    - Suppliers must ensure their workers are employed on the basis of negotiated, legal, written contracts and must provide a copy to the worker in a language they can understand
    - Obligations of employment shall not be avoided through the use of contracting, sub-contracting or apprenticeship arrangements, where there is no intent to provide regular employment.
- **Workers Representatives** – *freedom of association*
    - All workers have the right of association, to join or form trade unions and participate in collective bargaining of their choosing, without harassment, interference or retaliation.
    - Where these rights are restricted under law, the supplier shall not hinder workers efforts in the development of alternative means for independent association and bargaining.
- **Equal Opportunities** – *no discrimination*
    - All workers in the supply chain deserve to be treated fairly and equally.
    - Suppliers shall not discriminate in recruitment or employment practices including, hiring, remuneration, access to training, promotion, termination or retirement, based on race, skin colour, nationality, caste, religion, physical or mental disability, gender, sexual orientation, marital or maternity status, political opinions, union membership or age.
    - See our *Supplier Gender Inequality and Non-Discrimination Policy*
- **Subcontracting** – *extension of standard*
    - We would prefer our suppliers do not use sub-contractors or home workers for any Swannndri orders.
    - If the specialist skills are needed from other workers in the supply chain, all contract workers must be declared to Swannndri in writing before an order is placed. Written permission must be granted by Swannndri before this order is commenced.
    - It is our supplier's responsibility to ensure that any sub-contractor undertaking work on Swannndri products has read and understood this Code.
- **Transparency** - *traceability of all products*
    - To ensure responsible business practices throughout the supply chain Swannndri reserves the right to request information from suppliers regarding their suppliers, subcontractors, country of origins, identities and locations of raw material and components.

## ENVIRONMENTAL PRINCIPLES

- We expect all our suppliers to respect the environment and, at a minimum, abide by all applicable local and national environmental laws and regulations.
- All environmental permits and licenses for operations must be kept up to date.
- For all other environmental expectations, please refer to our *Environmental Policy*

## AGREEMENT

*Suppliers agree to implement this Code and applicable laws into business practices and submit to assessment along with any applicable training programs. Suppliers commit to take responsibility for their practices related to the standards in the Code of Conduct and work to implement management practices and improvement programs to prevent problems recurring. Suppliers are expected to communicate with Swannndri New Zealand any challenges that arise in the course of their business arrangement and commit to addressing these challenges collaboratively.*

*The senior management of the Supplier agrees to ensure compliance with this Code and to work with Swannndri New Zealand over a reasonable time to meet their obligations under this Code.*

Date: .....

<i>Supplier Company</i>	
<i>Authorised Signature</i>	
<i>Printed Name of Signee</i>	
<i>Title of Signee</i>	
<i>Email of Signee</i>	