

Ethical Sourcing and Modern Slavery Policy

Maggie Beer Holdings Limited

ACN 092 817 171

(the Company)

and its subsidiaries (the Maggie Beer Holdings Group)

Adopted by the Board April 2022

Ethical Sourcing and Modern Slavery Policy

Maggie Beer Holdings Group

1. Introduction

1.1 Background

Modern slavery involves the most serious forms of human exploitation and takes many forms, including: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

This Policy pursuant to the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by the Company to address ethical sourcing and modern slavery risks in its business operations and supply chain.

1.2 Terms and definitions

Suppliers is defined as factories, supplier sites and providers of goods or services to the Group.

Operations is defined as activity controlled by the Group.

Supply Chains is defined as suppliers and service providers to the Group.

2. Purpose

The Company is committed to identifying and mitigating the risk of modern slavery and human trafficking occurring within its business operations or supply chain.

The purpose of this Policy is to ensure that the Company and its subsidiaries (**Group**):

- comply with local, national and other applicable laws and regulations in the areas in which the Group's businesses operate;
- source products and services in accordance with legal obligations and community expectations while working with suppliers; and
- act to prevent, mitigate and where appropriate, remedy modern slavery in their operations and supply chains.

3. Policy Application

The principles of this policy fall within the Company's broader values and approach to human rights risk and is to be assessed and managed consistently with the Company's established risk framework.

The Company strives to be a leading provider of innovative and practical products that protect and enhance the environments and lifestyles of its customers, and to achieve this through a core set of values by being: **Passionate, Nimble, Ambitious, Inclusive and Community-Focused.**

The principles of this policy must be complied with or incorporated into the Group's other applicable charters and policies. This policy should be read in conjunction with the Company's Code of Conduct, Anti-Bribery and Corruption Policy and Whistleblower Policy.

4. The Policy

The Company rejects any form of modern slavery such as slavery, servitude, human trafficking and forced labour. The Group is committed to implementing controls to ensure modern slavery does not occur in its business. The Company aims to identify and manage risks related to human rights across its business and through its supply chain management.

4.1 Adopt Appropriate Procedures

Each applicable business unit must adopt policies and procedures to ensure that it is addressing modern slavery and ethical sourcing risks in its operations and supply chains in a way that is appropriate for that business unit.

4.2 Standard Supplier Terms

Each applicable business unit must, as far as practicable, include in its operational and supplier contract terms, requirements that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate.

4.3 Minimum Standards

Each business unit must, as far as practicable, incorporate in supplier contracts terms that:

- provide for a specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy;
- require contracted suppliers to hold their own suppliers to the same standards; and
- provide the Company with rights of termination if the supplier is unable or unwilling to comply with this policy.

4.4 Risk management

The Company will conduct risk assessments to determine which parts of the business and which supply chains are most at risk from modern slavery so efforts can be focused on those areas. Where appropriate, as informed by the risk assessment, the Company will engage directly with suppliers in respect of this Policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within these businesses, and where necessary, require that they implement systems and processes to effectively manage their own modern slavery risk.

Each business unit must implement an approach to modern slavery risk management in accordance with the guidelines in Annexure A.

5. Other matters

5.1 Consequences for breaching the Policy

Any breach of this Policy will be taken seriously and conduct in contravention of this Policy may be regarded as misconduct, leading to disciplinary action. An individual may also be exposed to criminal or civil liability for breaching the Act.

The Company reserves the right to inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of the law.

5.2 Whistleblower Procedure

An individual can make an anonymous disclosure in accordance with the Company's Whistleblower Policy. This allows reporting of breaches of any law, regulation, or any Group Policy, including concerns relating to modern slavery. All reports pertaining to any breach of law, regulation or policy are taken very seriously and are assessed and investigated accordingly.

5.3 More information

If there are any questions regarding any aspect of this Policy, please contact the Company Secretary.

5.4 Amendment of policy

This Policy can only be amended with the approval of the Board.

5.5 Adoption of Policy and Board review

This Policy was adopted by the Board on 21 April 2022 and takes effect from that date and replaces any previous policy in this regard.

The Board will review this Policy periodically. The Company Secretary will communicate any amendments to employees as appropriate.

Annexure A - Modern slavery risk management for each business unit

Accountability for modern slavery issues	Each applicable business unit will nominate a specified individual or role to be responsible for addressing modern slavery issues in operations and supplier contracts.
Supply chain mapping and risk assessment	Each applicable business unit must assess the risks of modern slavery across their operations. The risk assessment must initially address the modern slavery risks of those suppliers who are determined by the business unit to be high risk.
Due Diligence	Each applicable business unit must perform due diligence on suppliers to determine their risk level and control procedures in relation to ethical sourcing and modern slavery with consideration to the Minimum Standards set out below.
Minimum Standards	<p>In undertaking the due diligence set out above, the following are the Minimum Standards expected of suppliers:</p> <ul style="list-style-type: none"> • No forced or bonded labour, including but not limited to child labour (see below), human trafficking (e.g. derived from migration for employment), involuntary prison labour, coercion in wage payment (including debt bondage and bonded labour), threat of disciplinary measures, compulsory overtime or document retention. • No child labour (<i>Child Labour is defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.</i>) • Comply with all laws regulating local wages, overtime compensation and legally mandated benefits • Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable International Labour Organisation standards • Written contracts of employment are provided in language that all employees can easily understand. The contract includes all terms of service and clearly indicates employees and employers' rights and responsibilities with regard to payment of wages, working hours, valid grounds for termination, and other issues related to preventing forced labour. • Suppliers must ensure that they provide a healthy and safe work environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour • Bribes, favours, benefits or other similar unlawful or improper payments, whether in cash or in kind, are strictly prohibited • Suppliers must have adequate processes in place for properly managing sub-contracting to ensure that subcontractors operate in a way that is aligned with this policy • Suppliers must ensure they comply with relevant local and national environmental protection laws • If applicable, suppliers must ensure animals are treated humanely and with respect

- If suppliers employ or engage migrant workers, they must ensure that such workers have the same entitlements as local workers as stipulated by local law

Training

Each applicable business units must ensure that team members with relevant roles in relation to the policy receive adequate training on the Policy and any supporting processes applicable to their role.

Resolution

Each business unit must be work with suppliers to address and resolve any breaches of this Policy.