

## **GWA Group Supplier code of conduct**



GWA Group Limited ( **GWA, we, us, our** ) is committed to supporting the safety and human rights of workers in our supply chain and operations. To facilitate ethical and environmentally friendly procurement we require our suppliers to comply with the minimum standards set out in this code of conduct (**Code**). The principles of this Code are guided by ISO 20400:2017 Sustainable Procurement – Guidance, the United Nations Ethical Trade Initiative (**ETI**) and International Labour Organisation (**ILO**) Conventions.

## 1. Who this applies to

This Code applies to all suppliers who provide goods or services to us and their employees, agents, and subcontractors, who are involved in the supply of goods or services.

As a GWA supplier it is your responsibility to communicate the Code to your related entities, employees, agents, subcontractors or other suppliers who support you in supplying goods or services to us.

If you have any questions or queries as to whether or not the Code applies to you or the requirements of the Code please contact GWA's Company Secretary via [companysecretary@gwagroup.com](mailto:companysecretary@gwagroup.com).

## 2. Compliance with local laws

Suppliers must comply fully with the legal requirements of the countries in which they operate and have all requisite licenses or permits.

The requirements in this Code are in addition to compliance with laws.

## 3. Gifts, benefits, anti bribery, and corruption,

Suppliers will maintain business integrity at all times, such that they adopt a zero-tolerance approach to bribery and corruption and conduct business with honesty and integrity.

Suppliers must:

- not attempt to conceal or disguise gifts or hospitality given or received;
- not promise to give, or offer a payment, gift or hospitality with the expectation, intention or hope, that a business advantage will be received, or to reward a business advantage already given; and
- not participate in bribes, pay-offs, prohibited business practices, extortion or any other improper benefits, whether directly or indirectly.

## 4. Environment

Suppliers must:

- incorporate environmental and resource management principles into their operations

and pursue enhancements in environmental and resource management practices;

- comply, measure, monitor, and report environmental data in line with local and national laws, regulations, permits, licenses or approvals;
- maintain and keep up to date all required permits, licenses, approvals and registrations; and
- ensure factories have procedures to alert local environmental authorities of accidental discharge of pollutants or for any other environmental emergency.

## 5. Facility permits and safety

Suppliers must ensure their manufacturing facilities:

- have a valid and current business license and other documents required for legal operation, including but not limited to building safety, fire safety, and waste disposal permits.
- have an appropriate number of clearly marked and properly maintained exits for emergency evacuations;
- store properly maintained firefighting equipment and relevant first aid equipment;
- have properly maintained electrical equipment and wiring;
- have a fire alarm system that is audible throughout the entire facility, inspected regularly and tested with fire drills; and
- store flammable materials in a designated area away from emergency evacuation routes, open flames, heated surfaces, sparks, and unprotected electrical wiring.

Suppliers must:

- communicate fire and emergency evacuation plans and post the diagrams in the local language in locations around manufacturing facilities;
- conduct fire and emergency evacuation drills for all areas and shifts on an annual basis as required by law; and
- train designated personnel at regular intervals in fire safety, and how to administer the fire prevention procedures and emergency evacuation plan.

## 6. No child labour

Suppliers must comply with the minimum employment age limit which is the older of:

- the age limit under local law; or
- the limit under ILO Convention 138 (the local mandatory schooling age, but not less than 15 years of age).

Any exceptions to this rule must be agreed with us and allowed by the ILO and local law.

Suppliers must have policies and procedures to verify the age of workers to confirm no child labour is used, including an employment policy specifying the minimum age for employment.

Workers under 18 years old should not be engaged in hazardous tasks or night work in accordance with ILO Convention No. 090.

## 7. No Forced, Bonded or Involuntary Labour

Suppliers must:

- support us in meeting our obligations under the Australian Modern Slavery Act 2018 (CTH);
- verify that only workers with a legal right to work are employed;
- prohibit engagement in forced, bonded, human trafficking, indebted labour or involuntary prison labor; and
- ensure workers are free to leave their employment at their will after a reasonable notice period.

Suppliers must not:

- keep worker passports or identity documents;
- require workers to submit any form of financial deposits with employers or head contractors; or
- confiscate in part or full, the wages of workers to pay off debt or recruitment fees (costs relating to recruitment and placement of workers should be borne by the employer).

## 8. Working hours and overtime

Suppliers must keep accurate records of hours worked by all workers, including those employed through third party agents or labour providers for at least the previous 12 months.

Workers must:

- not work more than 72 hours per week (including overtime) or lesser time required by any local law;
- receive at least 2 days off in every 14 days.

Overtime work must be voluntary, must not be excessive, and must be compensated as required by local laws.

## 9. Wages, and benefits

Suppliers must:

- provide workers with written contracts in a language each worker understands, with clearly explained terms;
- ensure wages and benefit entitlements meet at a minimum, the higher of any applicable local laws or industry practices;
- pay wages directly, regularly, on time and

- within 30 days or shorter time required by law;
- ensure workers have full control of income earned. Wages must not be paid into a bank account in the name of the employer, or to a spouse or relative;
- pay any outstanding payments on termination or no later than the next payroll date, in full;
- grant workers compensation for paid leave, and all legally required benefits in accordance with the higher of local laws or industry practices; and
- where accommodation, meals or other goods are provided, ensure fees are not unreasonable and that the worker has the right to refuse them.

## 10. Regular employment

Suppliers must ensure workers with a regular employment relationship with their employer have at minimum, the mandatory rights under applicable local law relating to labour and social security.

## 11. Freedom of association

Suppliers must allow workers the right to join, and form trade unions, and to collectively bargain. Suppliers must:

- where local laws restrict the right to freedom of association and collective bargaining, not hinder the development of alternative means of independent and free association and bargaining; and/or
- not discriminate against workers' representatives who perform their lawful representative functions.

## 12. Grievance Mechanism

Suppliers must maintain and provide mechanisms which permit workers to provide a confidential way for workers to raise grievances and make workers aware of these grievance mechanisms.

Workers must be able to communicate grievances without fear of retaliation.

Suppliers must maintain a record of grievances raised and how they were resolved.

## 13. Workplace, health and safety

Suppliers must:

- provide workers with a safe and hygienic working environment with access to hygienic and dignified sanitation facilities, and clean potable water;
- ensure workers receive adequate, recorded training to perform their jobs safely;
- have a workplace policy for health and safety that ensures risks are assessed and records of

accidents and near misses are maintained, investigated and reported, and corrective action is performed to minimise risk of re-occurrence;

- hold appropriate employers' liability insurance;
- ensure personal protective safety equipment is available where necessary, and workers are trained in its use;
- ensure safety guards on machinery meet or exceed local laws and valid certifications are maintained for special machines;
- ensure risk areas such as toxic substances and dangerous machinery are identified and managed, and ensure chemicals are properly stored and labelled with Material Safety Data Sheets available to workers in the local language;
- ensure emergency eyewash stations and/or showers are provided where hazardous chemicals are handled and used; and
- respect the right of a worker to refuse work that they have justification to believe is unsafe, without suffering discrimination or loss of pay.

Where local law requires, suppliers, vendors and service providers must provide compensation to workers covering medical treatment for work related accidents, and compensation for work related accidents resulting in permanent disability.

## 14. Harassment, abuse or discrimination

Suppliers must:

- treat workers with respect and dignity. No worker should be subject to any form of inhumane treatment including intimidation, physical, sexual, psychological or verbal harassment or abuse;
- treat migrant workers equally to local workers ensuring they have the same entitlements as local workers, as stipulated by local law; and
- not discriminate against workers in any form based on race, caste, nationality, religion, age, pregnancy, disability, gender, marital status, sexual orientation, union membership or political affiliation.

## 15. Supplier governance

Suppliers must:

- keep us up-to-date where a product is being produced or assembled (including in subcontracted assembly centres) and obtain our prior approval for any changes to a product's manufacturing site;
- facilitate timely disclosure of material legal, ethical, social, and environmental matters that could adversely impact us;
- for each facility have a senior manager with overall responsibility for that facility;
- comply with our reasonable and lawful

requests to cease using a manufacturing site or subcontractor;

- conduct regular internal audits of their compliance with this Code;
- join the Supplier Ethical Data Exchange (**SEDEX**), complete an assessment, renew SEDEX membership, and address any identified issues as mutually agreed; and
- have a business continuity plan and risk management framework to minimise business impacts in the event of significant disruption.

## 16. Code of conduct requirements and review

We expect suppliers to have in place their own management tools, procedures and training to ensure their compliance with this Code. GWA may require:

- the supplier from its own records, self-assessments or audit reports, provide documentation and evidence to demonstrate the supplier's compliance with this Code; and
- GWA or independent auditor access to manufacturing facilities of the supplier to confirm compliance with the Code.