

---

# CODE OF CONDUCT POLICY

---

**HALLENSTEIN  
GLASSON** HOLDINGS  
LIMITED

# CODE OF CONDUCT POLICY

## VERSION 3 - 2021

This CODE applies to all our suppliers, their employees and subcontractors. We expect suppliers to ensure this is communicated to all stakeholders; to respect and comply with our Code of Conduct.

### 1.1. LEGAL REQUIREMENTS

Factories that produce goods for Hallenstein Glassons Brands shall operate in full compliance with the laws of their respective countries and with all other applicable laws, rules and regulations.

### 1.2. NO CHILD LABOUR SHALL BE USED

No supplier shall engage in or support the use of child labour under 16 years of age, unless the minimum age for work or mandatory schooling is higher by local law, in which case the stipulated higher age applies in that locality.

Employers must verify the age of their employees and maintain copies of their workers proof of age.

Young workers between the ages of 16-18 shall not be employed at night or in hazardous conditions.

If children are found to be working directly or indirectly for the supplier, HGH ethical compliance manager must be notified immediately. The facility must participate in HGH Child Remediation Process which provides for the child to remain in quality education until no longer a child.

### 1.3. PREVENTION OF FORCED LABOUR AND HUMAN TRAFFICKING

As a supplier to HGH Group you must comply with Australia's Modern Slavery Act - [Australian Modern Slavery Act](#).

Supplier shall ensure that all work is voluntary.

Supplier shall not traffic persons or use any form of slave, forced, bonded, indentured or prison labour.

# CODE OF CONDUCT POLICY

## VERSION 3 - 2021

Supplier shall not retain original identification papers and shall not require personnel to pay 'deposits' to the organization upon commencing employment.

Any Overtime Hours above contractual requirements is absolutely voluntary.

### **1.4. NO DISCRIMINATION IS PRACTISED**

There shall not be any discrimination in employment, including; hiring, compensation, benefits, advancement, discipline, termination or retirement.

There shall not be any discrimination on the basis of; gender, race, religion, age, disability, sexual orientation, nationality, union membership, political opinion or ethnic origin.

Supplier shall not require pregnancy or medical tests, except where required by applicable laws or regulations for workplace safety. Suppliers shall not improperly discriminate based on test results.

The factory is required to have a functioning grievance mechanism which includes investigation and efforts to address grievance. All workers should be trained on their rights and entitlements and how to use a grievance mechanism.

### **1.5. SAFE & HEALTHY WORKING ENVIRONMENTS SHALL BE PROVIDED**

Worker health and safety is important to Hallenstein Glassons Group. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.

Supplier shall obtain, keep current and comply with all required health and safety permits.

Supplier shall meet compliance with up-to-date fire safety laws, fire-fighting equipment and the implementation of evacuation procedures and emergency plans.

Employers shall ensure that workers have access to clean drinking water, sanitary washing facilities and an adequate number of toilets.

All suppliers shall minimize or eliminate, so far as is reasonably practicable, the causes of injury and accidents in the workplace, based upon the prevailing health and safety knowledge of the industry sector and of any specific hazards.

# CODE OF CONDUCT POLICY

## VERSION 3 - 2021

Hazards shall include, but not be limited to; fire safety, building safety, machine safety, chemical safety, and health safety.

These standards must also be met in any canteen, dormitory, rest and recreational area provided for workers.

### **1.6. WAGES & BENEFITS**

All suppliers shall ensure that wages for a normal work week, not including overtime, shall always meet at least the minimum legal wage or collective bargaining agreement (where applicable).

Supplier shall provide all legally mandated benefits and communicate pay structure and pay period to all workers.

As a company we support Living Wage and encourage our suppliers to meet Living Wage benchmarks.

All overtime shall be reimbursed at a premium rate as defined by national law or established by a collective bargaining agreement (where applicable).

Regular working hours (excluding OT) should not exceed 48 hours per week and have at least one day off in seven.

We prohibit the use of excessive Overtime. Working hours should not exceed 60 hours in any 7 day period.

All suppliers shall comply with applicable laws, collective bargaining agreements (where applicable) and industry standards on working hours, breaks and public holidays.

### **1.7 NO HARSH OR INHUMANE TREATMENT IS ALLOWED**

All suppliers shall treat their personnel with dignity and respect. Supplier shall commit to a workplace free of harassment and abuse.

No supplier shall engage in or tolerate the use of corporal punishment, mental or physical coercion.

# CODE OF CONDUCT POLICY

## VERSION 3 - 2021

No supplier shall engage in or tolerate verbal abuse or any other form of intimidation.

All forms of sexual abuse or harassment shall not be tolerated.

### **1.8. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING**

All suppliers shall recognize the right of employees to freedom of association and the right to collective bargaining.

All suppliers shall ensure that their personnel have the right to form, join or organize a trade union.

The supplier shall not interfere in any way with the establishment, functioning or administration of workers' organization(s) or collective bargaining.

All employers shall recognize the role of democratically elected worker representatives and must give them access to carry out their functions in the workplace.

### **1.9. SUPPORTING ENVIRONMENTAL RESPONSIBILITY**

All suppliers shall comply with local environmental law and obtain, keep current and comply with all required environmental permits.

All suppliers shall comply with the reporting requirements of applicable permits and regulations.

All factories shall comply with HGH Restricted Substance List (RSL) and Manufacturing Restricted Substance List (MRSL).

All factories must have an Environmental Action Plan documenting implemented controls to minimize the impacts on the environment for:

- Solid Waste Disposal
- Hazardous chemicals storage / use / management / disposal
- Air and water emissions
- Adequate training for workers in the safe handling of chemicals

Suppliers must maintain procedures for notifying local authorities in the event of an environmental accident resulting from the suppliers operations.

# CODE OF CONDUCT POLICY

## VERSION 3 - 2021

### 1.10 RAW MATERIALS

All raw materials used by suppliers must be ethically sourced and the standards outlined in this code of conduct must flow into all parts of their supply chain.

Suppliers must not under any circumstances knowingly use cotton that is sourced from Uzbekistan or from any origin where child labour is known.

Please read in conjunction with HGH Animal Welfare Policy

### 1.12. RIGHT OF INSPECTION

Our company expects all suppliers and their contractors to respect and comply with our Code of Conduct.

All suppliers must provide Hallenstein/Glassons with current, accurate information regarding the name and location of all production facilities that are being used to make our product.

Our company reserves the right to make unannounced visits to all associated manufacturers and suppliers by Hallenstein/Glassons staff or by nominated third-party inspection companies on our behalf, to ensure all suppliers and production facilities comply with our Code of Conduct document.

### 1.13. NON-COMPLIANCE

Non-compliance with any of these requirements may result in the immediate cancellation and termination of all outstanding orders and further business relations.

**Signed by:**

**Position of Signatory:**

**Date of Signature:**