



Code of Business Conduct

About the Code

Thankyou Group Pty Ltd considers business ethics as fundamental to its operation and existence. Thankyou Group operates under a Code of Business Conduct, which sets forth the key principles under which the company and its subsidiaries are required to operate.

This Code of Business Conduct states that the conduct of business with employees, customers, consumers, suppliers/partners, agents and all others shall be on an honest, fair and equitable basis.

Thankyou Group and its contractors, suppliers/partners and agents adhere to the laws of each country and honour their obligations to society, operating in a responsible manner that is economically, intellectually, and environmentally friendly to each community in which the respective company operates.

In the selection of its contractors, suppliers/partners, and agents, Thankyou Group chooses only suppliers/partners who have met, and are committed to meeting, these Code of Business Conduct principles.

We expect that wherever our products, ingredients and materials are manufactured and/or sourced, they will be manufactured and/or sourced in a manner that is socially and environmentally responsible.

Each of Thankyou Group's contractors, suppliers/partners and agents agree, across their respective supply chains, that by accepting orders from Thankyou Group or any of its subsidiaries, it will abide by and implement the Thankyou Code of Business Conduct.

Compliance Guidelines

Thankyou's suppliers & partners agree to:

- (1) Comply with all of Thankyou's Code of Business Conduct Principles outlined below.
- (2) Promptly inform Thankyou of any breach or suspected breach of any of the Principles by it or by its suppliers/partners.
- (3) Make available their internal documents (eg. Code of Conduct, responsible policies and practices) that uphold their commitment to minimising harmful social and environmental impact; which influences decisions within their own internal operations, and their supplier partnerships.
- (4) Conduct a Sedex Members Ethical Trade Audit (SMETA 4-Pillar) at their expense (or equivalent globally recognised social/ environmental third-party audits) yearly and also act on the Corrective Action Plans outlined at the end of audit. This will be verified by a Thankyou team member.
- (5) Provide Thankyou with 100% traceability of all raw inputs (inclusive of derivatives), supplying information per Thankyou product of all its raw ingredients and the country of origin per ingredient, quantity per ingredient procured annually, and any relevant certification attached to the raw ingredient and the manufacturing process.
- (6) Maintain visibility of their environmental impact (i.e. by reporting on quantifiable data demonstrating their carbon emissions, waste contribution and water consumption) which is independently verified and assessed yearly.
- (7) Agree and align with Thankyou's Responsible Business Goal

Code of Business Conduct Principles

Thankyou Group's authorised suppliers & partners' must fully comply with the following principles:

Principle 1 - Legal and Ethical Business Practices

- 1.1. Thankyou Group's authorised suppliers/partners must fully comply with all applicable laws of the countries in which they are located, including all laws, regulations and rules relating to wages, working hours, employment, labour, health and safety, the environment, and immigration.
- 1.2. Thankyou Group's authorised suppliers/partners must act in an ethical manner, ensuring that corruption in all its forms, including extortion and bribery, is not permitted within their supply chain.
- 1.3. Thankyou Group's authorised suppliers/partners must be able to verify the legal entitlement of their employees to work in the country of employment.

Principle 2 - Child Labour

- 2.1 Thankyou Group prohibits child labour to be used in the production of their products, even when local laws and customs permit such a practice.

As defined by the International Labor Organisation, child labour is defined as any employment undertaken by a child which is aged younger than 15, or at an age younger than the age for completing compulsory education, where such age is higher than 15.

Child Labour is also defined as any work which deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and
 - interferes with their schooling by:
 - depriving them of the opportunity to attend school;
 - obliging them to leave school prematurely; or
 - requiring them to attempt to combine school attendance with excessively long and heavy work.
- 2.2 Thankyou Group's authorised suppliers/partners must observe and adhere to all legal requirements for work of employees under 18 years of age, particularly those pertaining to hours of work and working conditions. This includes no children being employed at night or working in hazardous conditions.

Principle 3 - Forced Labour

- 3.1 Thankyou Group's authorised suppliers/partners will not use involuntary or forced labour - indentured, bonded or otherwise.
- 3.2 Employment must be freely chosen.
- 3.3 Workers must be free to leave their employment after reasonable notice has been given.
- 3.4 Employees must not be required to lodge identity papers or deposits with suppliers/partners.

Principle 4 - Wages and Benefits

- 4.1 Thankyou Group's authorised suppliers/partners must compensate their employees and contractors fairly by providing compensation packages comprising of wages and benefits that, at the very least, comply with legally mandated minimum standards or the prevailing industry wage, whichever is higher. Over time, our partners commit to paying wages that will meet employees' basic needs and provide some discretionary income.
- 4.2 Thankyou Group's authorised suppliers/partners shall provide legally mandated benefits to all workers.
- 4.3 Thankyou Group's authorised suppliers/partners must fully compensate all workers for overtime according to local law. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 4.4 Thankyou Group's authorised suppliers/partners must provide all workers with clear and understandable information about their employment conditions in respect to wages, before they enter employment, and about the particulars of their wages for the pay period concerned each time that they are paid.
- 4.5 Thankyou Group's authorised suppliers/partners must not make deductions from wages for disciplinary measures. Deductions may only occur with the express written permission of the worker concerned.

Principle 5 - Hours of Work

- 5.1 Thankyou Group's authorized suppliers/partners must ensure employees' hours worked shall not exceed the lesser of (a) the legal limitations on regular and overtime hours in the jurisdiction in which they manufacture or (b) 48 hours per week excluding overtime. The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 5.2 below.

- 5.2 In the event of an extraordinary business circumstance (the supplier/partner must show evidence of the cause of the exceptional circumstances, such as unexpected production peaks, accidents or emergencies), overtime may exceed 48 hours in a 7 day period if it is allowed by national law, allowed by the collective agreement freely and fairly negotiated, and appropriate safeguards are taken to protect workers health.
- 5.3 Thankyou Group's authorised suppliers/partners must inform all workers at the time of hiring if mandatory overtime is a condition of employment.

Principle 6 - Freedom of Association and Collective Bargaining

- 6.1 No employees working within Thankyou Group's authorised supplier/partner's supply chain shall be subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively.
- 6.2 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Principle 7 - Health and Safety

- 7.1 Thankyou Group's authorised suppliers & partners must provide their employees with a clean, safe and healthy work environment, designed to prevent accidents and injury to health and safety in the course of their work (must meet or exceed local law).
- 7.2 Thankyou Group's authorised suppliers & partners must receive regular and recorded health and safety training for all workers.
- 7.3 Thankyou Group's authorised suppliers & partners must supply safe and clean toilet facilities, access to safe water and sanitary facilities for all workers. The provision of these facilities must satisfy local law at minimum (inclusive of adequate ratios of water, sanitation and hygiene facilities in relation to worker population).
- 7.4 Thankyou Group's authorised suppliers & partners must have implemented OH&S policies & procedures which are enforced and monitored by a senior management representative.

Principle 8 – Non-discrimination

- 8.1 Thankyou Group's authorised suppliers/partners may not discriminate on the basis of race, age, colour, national origin, gender, religion, sexual orientation, disability, political opinion, or social or ethnic origin.

Principle 9 - Harassment

- 9.1 Thankyou Group's authorised suppliers/partners must treat all employees with respect and dignity and may not subject any workers to corporal punishment, physical, sexual, psychological or verbal harassment or abuse.

Principle 10 - Women's Rights

- 10.1 Thankyou Group's authorised suppliers/partners must ensure that women workers will receive equal remuneration, including benefits, equal treatment, equal evaluation of the quality of work, and equal opportunity to fill all positions open to male workers.
- 10.2 Pregnancy tests will not be a condition of employment, nor will they be demanded of any worker.
- 10.3 Workers who take maternity leave (of a duration determined by local and national laws) will not face dismissal nor threat of dismissal, loss of seniority or deduction of wages, and will be able to return to their former employment at the same rate of pay and benefits.
- 10.4 All workers will not be forced or pressured to use contraception.
- 10.5 All workers will not be exposed to hazards including glues and solvents, that may endanger their safety, including their reproductive health.
- 10.6 Thankyou Group's authorised suppliers/partners shall not deny women workers access to appropriate services and accommodation in connection with pregnancy that would otherwise be ordinarily available to them.

Principle 11 - Worker Residence (Dormitory)

- 11.1 Dormitories and residencies of Thankyou Group's authorised suppliers/partners must be a clean, safe and healthy residence environment.
- 11.2 The dormitory design must provide adequate privacy, security and freedom of movement for all occupants.
- 11.3 Dormitory facilities must comply with all applicable, legally mandated standards in the countries in which they are located.

Principle 12 - Environment

- 12.1 Thankyou Group's authorised suppliers/partners must comply with the laws and regulations relating to environmental protection in the countries in which they operate, as a minimum.
- 12.2 Facilities should have policies and procedures in place to ensure environmental impacts are minimized with respect to energy, air emissions, water, waste, hazardous materials and other significant environmental risks.
- 12.3 Thankyou Group's authorised suppliers/partners are obliged to comply with determined actions that will make substantial improvements in environmental performance as well as the requirement that each facility puts on and enforces of their suppliers/partners and sub-contractors

These principles have been written in line with the Ethical Trading Initiative (ETI Base Code). The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this base code address the same subject, to apply that provision which affords the greater protection.

Declaration

On behalf of _____ (ABN _____),

I accept, and undertake to comply with, the principles set out in this Code of Business Conduct and acknowledge that a breach of one or more of these principles will result in a breach of any underlying agreement to supply Thankyou Group Pty Ltd with goods or services.

Signature:

Witness Signature:

Name:

Name:

Position:
