

## **About the Code**

Thankyou Group Pty Ltd considers business ethics as a fundamental principle of 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, agents and all others shall be on an honest, fair and equitable basis.

Thankyou Group and its contractors, suppliers and agents adheres to the laws of each country and honours its obligations to society operating in a responsible manner that is economical, intellectual, and environmentally friendly to each community in which the company operates.

In the selection of its contractors, suppliers, and agents, Thankyou Group works hard to choose only suppliers 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 and agents agree, across their respective Supply Chains, that by accepting orders from Thankyou Group or any of its subsidiaries it will abide and implement the Thankyou Code of Business Conduct.

## **Compliance by Suppliers**

Thankyou's Suppliers 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.
- (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) at their expense (or equivalent globally recognised social/environmental third party audits) yearly and also must 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.

## **Code of Business Conduct Principles**

### **Principle 1 - Legal and Ethical Business Practices.**

Thankyou Group's authorised suppliers' facilities must fully comply with all applicable laws of the countries in which they are located including all laws, regulation and rules relating to wages, working hours, employment, labour, health and safety, the environment, immigration. Thankyou Group's authorised suppliers must act in an ethical manner, ensuring that corruption in all its forms including extortion and bribery is not permitted within their supply chain.

### **Principle 2 - Child Labour.**

Thankyou Group strongly prohibits the practice of under age workers to be used in the production of their products, even when local laws and customs permit such a practice. As defined by the International Labour Organisation, no person shall be employed at an age younger than 15, or at an age younger than the age for completing compulsory education, where such age is higher than 15. All of Thankyou Group's authorised suppliers must observe all legal requirements for work of employees under 18 years of age, particularly those pertaining to hours of work and working conditions.

### **Principle 3 - Forced Labour.**

Thankyou Group's authorised suppliers will not use involuntary or forced labour - indentured, bonded or otherwise.

### **Principle 4 - Wages and Benefits.**

Thankyou Group's authorised suppliers must compensate their employees and contractors fairly by providing compensation packages comprising wages and benefits that, at the very least, comply with legally mandated minimum standards or of the prevailing industry wage, whichever is higher, and shall provide legally mandated benefits. Employees must be fully compensated for overtime according to local law and each employee must be provided with clear, written accounting for each pay period.

### **Principle 5 - Hours of Work.**

Thankyou Group's authorised suppliers must ensure employees' hours worked shall not exceed the lesser of (a) the legal limitations on a regular and overtime hours in the jurisdiction in which they manufacture or (b) 48 hours per week excluding overtime. In the event of an extraordinary business circumstances (the supplier 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. Employees must be informed at the time of hiring if mandatory overtime is a condition of employment.

### **Principle 6 - Freedom of Association and Collective Bargaining.**

No employees working within Thankyou Group's authorised suppliers' supply chain shall be subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively. Thankyou Group's authorised suppliers shall obtain and comply with current information on local and national laws and regulation regarding Freedom of Association and Collective Bargaining.

### **Principle 7 - Health and Safety.**

Thankyou Group's authorised suppliers 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. All authorised Thankyou Group suppliers are required to comply with the applicable, legally mandated standards of workplace health and safety in the countries and communities in which they operate.

### **Principle 8 - Non-discrimination.**

Thankyou Group's authorised suppliers 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.**

Thankyou Group's authorised suppliers must treat all employees with respect and dignity and may not subject employees to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, Thankyou Group's authorised suppliers may not use monetary fines as a disciplinary practice.

**Principle 10 - Women's Rights.**

Thankyou Group's authorised suppliers 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. Pregnancy tests will not be a condition of employment, nor will they be demanded of employees. 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. Employees will not be forced or pressured to use contraception. Employees will not be exposed to hazards including glues and solvents, that may endanger their safety, including their reproductive health. Thankyou Group's authorised suppliers 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).**

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

**Principle 12 - Environment.**

Thankyou Group's authorised suppliers must comply with the laws and regulations relating to environmental protection in the countries in which they operate as a minimum. 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. Thankyou Group's authorised suppliers 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 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 \_\_\_\_\_ (organisation)

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:

\_\_\_\_\_

Name:

\_\_\_\_\_

Position:

\_\_\_\_\_

Witness Signature:

\_\_\_\_\_

Name:

\_\_\_\_\_