
ETHICAL SOURCING, HUMAN RIGHTS AND ENVIRONMENTAL POLICY

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1. SCOPE

1. Our top priority at Heather Brae Shortbreads is the health and safety of our employees and our customers and we are committed to protecting the quality and ongoing delivery of our products to our customers.
2. Heather Brae Shortbreads is committed to operating within the highest levels of personal and business integrity and its day to day operations are based on solid ethical principles.
3. Heather Brae Shortbreads adheres to all Legislative and Government requirements in relation to Human Rights, Modern Slavery Legislation, Industrial Law, Corporate Law and Environmental Legislation and directives.
4. This policy applies to our entire organisation and those we do business or partner with including suppliers, vendors and contractors.
5. Suppliers we do business with or partner with need to satisfy us that they engage ethically in all dealings of their operations.
6. While governments have the primary responsibility for protecting Human Rights through a range of legislation, laws and regulatory obligations currently in existence that Businesses must comply with, businesses have a role to play by respecting and enforcing them in their business practices and dealings.
7. For the purpose of this policy Human Rights is as defined by the United Nations (UN) which defines it as ***'rights inherent to all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, colour, religion, language or any other status'***
8. Heather Brae Shortbreads is committed to minimising its carbon footprint and exploring sustainable options to reduce short and long term impacts on the environment

2. BRIBARY

1. Bribes, favours, benefits or other similar unlawful business dealings are prohibited, whether given to obtain business or otherwise.
2. Heather Brae Shortbreads will keep accurate records of all payments made and received for audit purposes.

3. FORCED AND BONDED LABOUR

1. All Employment at Heather Brae Shortbreads shall be freely chosen.
2. Heather Brae Shortbreads will not use forced labour (any work or service extracted from any person which work has not been freely chosen by the person), bonded labour (work which is not

for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange)

3. Heather Brae Shortbreads respects the freedom of movement of their workers and will not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment
4. Heather Brae Shortbreads will ensure that workers are free to leave their employment with the Company after reasonable notice and in accordance with the Terms and Conditions as outlined in their Employment Contract or Statutory Award whichever is applicable.
5. Employees of Contractors that Heather Brae Shortbreads engages will conduct contract work at Heather Brae on behalf of their Employer by choice and their Employer will not force them to undertake work at Heather Brae Shortbreads.
6. Employees of Contractors that undertake contract work at Heather Brae Shortbreads need to be engaged under appropriate Awards or Employee Agreements in accordance with Industrial Law and be willing to verify this to the Company.

4. FREEDOM OF ASSOCIATION and GRIEVANCE MECHANISMS

1. Heather Brae Shortbreads respects the rights of workers to lawfully not associate or associate with groups of their choosing, as long as such groups are legal in the country of operation.
2. Employees should have the right to not join or join trade unions of their choosing.
3. Worker representatives are elected fairly through an open and transparent voting system and are not discriminated against
4. Employees have access to company management or appropriate process, in order to address grievances and other issues.

5. CHILD LABOUR

In this policy,

'Child' is defined as a person under the age of 14 years and 9 months, or below the age at which school attendance is not compulsory under Victorian Law, which ever is older.

'Young person' is defined as a person under the age of 18 but not classified as a child.

'Child labour' refers to work that deprives children of their childhood and affects their schooling, their potential and their dignity. It refers to work that is harmful to them mentally, physically and socially.

1. Heather Brae Shortbreads will **not** use child labour

2. Heather Brae Shortbreads has the appropriate processes in place for verifying the age of all employees and job applicants, including:
 - Requiring all employees to provide photo ID on commencement of employment, which shows the birth date of the employee.
 - Keeping and validating documentation verifying our employees' age after they are hired.
3. Heather Brae Shortbreads will not employ Children and Young Persons as defined above at night and in hazardous conditions.

6. ILLEGAL LABOUR

1. Heather Brae Shortbreads will conduct checks to ensure the legal entitlement of all employees to work in Australia.

7. HARSH OR INHUMANE TREATMENT

1. Employees shall be treated with dignity and respect. Employees have the right to work in a workplace free from harassment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.
2. Heather Brae Shortbreads will comply with legal and regulatory requirements which incorporate Human Rights which include:
 - Employment laws covering areas such as discrimination, harassment – including sexual harassment, workplace bullying, victimisation, domestic violence and occupational health and safety
3. Heather Brae Shortbreads will ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.
4. All employees will be made aware of the rights of each other as employees as described in 7.1 and 7.2 through their initial employment induction, staff meetings, training, policies and visual posters displayed around the workplace.
5. Heather Brae Shortbreads expects its customers, suppliers and other persons with whom the business has a relationship with to respect Human Rights and comply with legal and regulatory requirements
6. Heather Brae Shortbreads will seek to avoid knowingly dealing with Suppliers or Customers where it could be complicit in Human Rights Abuses

8. WAGES AND BENEFITS

1. Wages and benefits paid to employees by Heather Brae Shortbreads meet as a minimum National Legal Standards in accordance with the relevant Award, Collective Agreement if applicable and meet Industry Benchmark Standards.
2. All employees are provided with written and understandable information about their employment conditions in respect to wages, conditions and benefits before they enter employment.
3. Employees are provided with wage pay slips which outlines the particulars of their wages for the pay period concerned each time they are paid. Employees can query their respective pay slips if they feel they are not representative of the hours that they worked or they query the appropriate pay rate through contacting Heather Brae Shortbreads Office Manager, or the Managing Director.
4. Deductions from wages as a disciplinary measure is not permitted.
5. Deductions from wages not provided for by law shall not occur.
6. Record keeping in relation to Wages and Benefits is in accordance with National Law and approved Australian Accounting Software is used.

9. WORKING HOURS

1. Working hours comply with applicable laws, collective agreements or Employment Contracts.
2. Employees are not required to work more than the maximum hours per week defined in the relevant employment instrument
3. Overtime shall be agreed and shall be compensated as prescribed by the applicable employment instrument.
4. All overtime is Voluntary
5. Employees as a minimum must have at least one day off in 7 days or two days off in every 14 days.
6. Record keeping on hours worked is through clock cards, except for Middle Management who have a manual sign in/out system in place.
7. Working hours exceeding 60 hours a week must not be a systemic occurrence, except where;
 - Exceptional circumstances apply such as unexpected production peaks, accidents, or emergencies.
8. Appropriate safeguards to protect workers' health and safety have been undertaken.

10. WORKING CONDITIONS ARE SAFE & HYGIENIC

1. Heather Brae Shortbreads shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and National Legislative requirements
2. Heather Brae Shortbreads has a senior management representative assigned to the responsibility of health and safety.
3. Trained employees administer and oversee health and safety
4. Employees receive adequate and regular training to perform their jobs in a safe manner and training records are maintained.
5. Personal protective equipment (PPE) and machinery safeguards are supplied and employees trained in their use.
6. Safeguards on machinery meet or exceed local laws.
7. Employees will have access to clean toilet facilities, clean drinking water, and sanitary facilities for food storage and preparation except where a directive from the relevant Health Department forbids such communal use of such facilities ie COVID Restrictions.
8. Employees of Heather Brae Shortbreads have the right to refuse to undertake work that is deemed unsafe without fear of retribution.

11. DISCRIMINATION

1. Heather Brae Shortbreads will at all times base employment on an individual's ability to do the job, not on personal characteristics such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, pregnancy, sexual orientation, non-union membership, union membership or political affiliation.

12. RECRUITMENT

1. Heather Brae Shortbreads will provide each employee with a clear, understandable employment contract containing all legally required employment, terms and conditions.
2. All Employees will attend an induction outlining all policies pertaining to the individual's employment with the Company, expectations of compliance to such policies and relevant legislation requirements pertaining to their position.

13. MIGRANT WORKERS

1. Migrant workers shall have the same entitlements as local workers as stipulated by law.
2. Heather Brae Shortbreads will **not** require the worker to surrender identification documents.
3. Workers employed through a third party agent or contractor are the responsibility of the suppliers and are thus subject to and must comply with this Policy.

14. ENVIRONMENTAL STANDARDS

1. Heather Brae Shortbreads is committed to minimising harmful effects on the environment, both locally and globally.
2. Heather Brae Shortbreads will comply with applicable legal requirements and other requirements to which the Company subscribes which relate to its environmental aspects and obligations.
3. Every Employee has a responsibility of care of the environment and the Company will educate, train and motivate Employees to carry out tasks in an environmentally responsible manner.
4. Heather Brae Shortbreads will prevent pollution, reduce waste and minimise where possible the consumption of resources.
5. An Environmental Management System will be developed to meet current and anticipated legal requirements in all functions and at all levels in the business, and where appropriate establish best practice within our industry sector.
6. Environmental objectives and targets will be set and supported by documented management controls and at all times the Company will strive to improve its reduction in resource consumption.
7. The use of energy, water and raw materials will be minimised. Heather Brae Shortbreads has installed and is committed to the use of solar energy alternatives where practical.
8. Waste generation will be minimised – encouraged by re-use, alternative use and recycling
9. Heather Brae Shortbreads will promote the use of recycling and recoverable materials with all packaging materials
10. Heather Brae Shortbreads will where possible contribute to environmental matters in the local community

