



Supplier Code of Conduct



Our Supplier Code of Conduct

Purpose

At T&G Global, we are committed to the highest standards of environmental, social and business responsibility and ethical conduct, including respect for human rights. Our suppliers play a fundamental role in supporting us to meet this commitment.

The Māori value of kaitiakitanga is central to who we are and what we do, and it captures what sustainability means to us – treating the land, people, produce, resources and community with the greatest of respect and care, as guardians of their future. It is important to us that our suppliers share these beliefs and values and seek to make a genuine, lasting and positive impact through their business practices.

The goal of this Supplier Code of Conduct (**Code**) is to positively influence behaviours within the supply chains that support our business, so that they align with the Code.

The Code outlines the standards and expectations we have of all suppliers (**Suppliers**) of goods or services to T&G Global Limited and any of its subsidiaries (**T&G**).

If you have questions about this Code, please contact T&G's risk and compliance team via risk@tandg.global.

General information on this Code

Scope

This Code applies to all Suppliers. Suppliers must meet the requirements of the Code and we encourage our Suppliers to go above and beyond these requirements where appropriate. Suppliers are responsible for ensuring their directors, employees, agents, contractors and other workers understand, and comply with the requirements of this Code.

We also expect our Suppliers to promote principles consistent with this Code with their own suppliers, agents and contractors.

This Code is based on a number of locally and internationally recognised standards and frameworks, including the United Nations Guiding Principles on Business and Human Rights ([UNGPs](#))¹ and the Ethical Trading Initiative ([ETI](#)) Base Code.²

Compliance with laws and regulations

Suppliers must comply with all applicable international and national standards and applicable international and local laws and regulations in supplying goods or services to T&G.

Where the requirements of this Code conflict with any applicable laws, Suppliers should respect international human rights and standards to the greatest extent possible, while still complying with such laws. Where the requirements of this Code and any applicable laws differ but do not conflict, Suppliers should follow the stricter requirement.

Compliance with the Code

T&G reserves the right to monitor and audit compliance with the Code by Suppliers. Suppliers must promptly advise T&G via email at risk@tandg.global if they identify that they have, or may have, failed to meet the requirements set out in this Code. Suppliers must also advise T&G if they identify any contractor or sub-supplier, directly linked to the provision of goods or services to T&G, who has acted inconsistently with the principles set out in this Code.

Suppliers must provide written information in response to any requests by T&G relating to compliance with this Code within a reasonable timeframe. This includes providing access to any relevant documentation or records reasonably requested by T&G.

If T&G identifies a Supplier is, or may be at risk of, non-compliance with this Code, the Supplier must implement any reasonable corrective actions specified by T&G. If a Supplier does not take appropriate corrective actions, T&G reserves the right to reconsider its ongoing business relationship with the Supplier.

T&G also reserves the right to reconsider its ongoing business relationship with a Supplier if the Supplier does not take appropriate action to address any actions by the Supplier's contractors or sub-suppliers that are inconsistent with the principles set out in this Code, and where the goods or services those contractors or sub-suppliers are providing are directly linked to T&G.

T&G is committed to working constructively with Suppliers to address any actual or potential issues relating to compliance with the Code.

T&G would generally only consider terminating its business relationship as a last resort where a Supplier is unwilling or unable to address the issues identified.

Reporting concerns

Suppliers, their directors, employees, agents, contractors, workers and other stakeholders can contact T&G directly via email at risk@tandg.global at any time to discuss concerns about compliance with the Code.

Anonymous reports can also be made via SpeakUp, our confidential whistleblowing system: www.speakup-tandg.com.

1. The [UNGPs](#) are the global standard for preventing and addressing adverse human rights impacts associated with businesses' activities. They apply to all businesses regardless of their size, sector or country of operation.

2. The ETI Base Code is an internationally recognised code of labour practice. It is based on the conventions of the International Labour Organization (ILO) and covers nine key areas, such as discrimination, living wage and safe working conditions. The ETI Base Code provides a clear and widely agreed common standard to support businesses to respect human rights.

At a minimum, Suppliers must take appropriate steps to ensure:

1. Respect for workers' human rights

All workers are treated with respect and dignity, free from discrimination, harassment and harsh or inhumane treatment

- No worker should be subjected to any form of discrimination based on race, ethnicity, age, sex, gender, gender identity, religion, sexual orientation, differences in physical or cognitive abilities, marital and family status, political or other opinion, union membership or any other recognised reason.
- There should be no discrimination in employment of workers, including in relation to hiring, compensation, advancement, discipline, termination or retirement.
- No workers or any other persons present on Suppliers' sites should be subjected to abuse of any kind, including verbal, psychological, physical or sexual abuse. Intimidation, threats, coercion or harassment of any kind must not be tolerated.

Working hours are reasonable and workers are paid fair wages

- Individual's working hours, including voluntary overtime work, and the granting of leave of any form, must be in accordance with applicable laws, and/or relevant International Labour Organization (ILO) Conventions, whichever provides greater protection to workers.
- Workers must not work more hours in one week, including overtime, than allowable under applicable laws.
- Overtime is to be voluntary, compensated at an appropriate rate and must be provided under safe and healthy working conditions.
- All workers must be paid a proper and competitive wage which is at least equal to the statutory or industry minimum wage of the relevant country in which they work. At a minimum, Suppliers shall ensure that wages paid cover the basic needs of individuals, taking into account other attributable circumstances (for example, part-time employment or secondary income activities).
- Suppliers shall not make any deductions from workers' wages without the express permission of the worker and unless the deduction is permitted under applicable laws. Deductions from wages as a disciplinary measure are not permitted.

3. Child labour is defined by the ILO as work that deprives children of their childhood, their dignity, the opportunity to attend school and fulfil their potential and that is harmful to their physical, moral and mental development. Child labour may include situations where children work on family farms or holdings where this work is hazardous or harmful to the child's health or personal development (including carrying heavy loads or handling pesticides or other non-age appropriate work) and where the work is detrimental to their schooling. The ILO's webpage provides further information about child labour.

All workers are of an appropriate age

- Suppliers must not engage in child labour³. Suppliers must take appropriate steps to verify the age of all workers employed or contracted by Suppliers or present on Suppliers' sites to ensure no child labour is used.
- A Supplier must not employ individuals under the age of 15 years or under the local legal minimum age for work.
- Where legally permitted, this does not prevent engaging workers between the ages of 13 and 15 to undertake light work which also does not harm their health, safety or mandatory school attendance.
- National labour standards for the protection of children and adolescents must be complied with (the exceptions of the relevant ILO Conventions apply⁴).
- Young workers, under the age of 18, must not be exposed to any activity which, by its nature or the circumstances in which it is carried out, is mentally, physically, socially or morally dangerous, harmful, or hazardous, or interferes with their compulsory schooling by restricting their opportunity to attend school.
 - This includes using, procuring or offering young workers for illicit activities (in particular for the production and trafficking of drugs or for prostitution, the production of pornography or pornographic performances).
- If child labour is identified, the Supplier must cease using child labour and ensure there is an appropriate remediation plan in place which supports the transition of the child to appropriate education.

4. Participation in workplace apprenticeship programmes and light work as defined by the ILO are permitted.

Work is conducted on a voluntary basis

- Suppliers must not engage in modern slavery practices, including forced labour, compulsory work, slavery, servitude or other forms of slavery.⁵
- Employment should be freely chosen. Workers must be free to leave their employer after reasonable notice.
- Workers must not be required to lodge identity papers or other personal documents with Suppliers.
- Workers must not be required to pay recruitment or other commission fees to third-party agents or others in connection with their employment.

All workers are free to exercise their rights to collective bargaining and association

- All workers have the right to freedom of association and collective bargaining. The lawful exercise of these rights must not result in retaliation against the worker or any workers' representatives.
- Where these rights are restricted by applicable law, Suppliers will not hinder the development of alternative means of independent and free association and bargaining.

5. Modern slavery practices include any labour or service of a person obtained through the use of threats, coercion or deception and which deprives them of their personal freedom. Modern slavery includes, but is not limited to, slavery, forced labour, servitude, debt bondage, human trafficking, deceptive recruiting, involuntary prison labour and the worst forms of child labour, in line with international standards.

Workers have safe and healthy work environments

- We expect Suppliers to provide a work environment that is physically and mentally safe and healthy and to take all reasonable and practicable steps to prevent harm to workers (including workers employed or contracted by Suppliers, using Supplier's equipment, or present on Suppliers' sites, such as cleaners and other facilities management staff, and labour hire workers).

Reasonable and practicable steps includes:

- Complying with applicable health and safety legal and regulatory standards.
- The implementation of measures that are designed to prevent harm that may arise as a result of the work performed.
- Monitoring of those measures to ensure they are effective and looking for opportunities to continually improve.
- Workers must have access to clean toilet facilities and clean drinking water. Where appropriate, clean and hygienic facilities for food storage and preparation should be provided.
- Where accommodation is provided to workers by Suppliers, it must be clean, safe and meet the basic needs of the workers.

All workers' rights are respected when security staff are employed

- If the Supplier has its own security staff or third parties (private or public security staff) are employed or contracted to protect the company's operations, Suppliers must ensure that workers' human rights, as outlined in this Code, are respected through appropriate instruction and supervision of such staff or third parties. This means in particular a prohibition of the excessive use of force, sexual or physical abuse or any form of torture, cruel, inhumane or degrading treatment, including sexual or physical abuse.

The rights of seasonal workers are respected⁶

- Where seasonal workers are employed or contracted by a Supplier, including where seasonal workers are employed directly by the Supplier or through third-party agents, the Supplier must:
 - Comply with all applicable laws and regulations (including the requirements of the Recognised Seasonal Employer scheme where the Supplier is based in Aotearoa New Zealand) in respect of seasonal workers;
 - Ensure workers are provided with clear information about their employment terms and entitlements in a form they understand, including in their native language where appropriate.

6. The rights of seasonal workers are not limited by this clause in any way and Suppliers must extend the protections and rights included in this Code in its entirety to all seasonal workers, including in relation to the payment of wages and entitlements and retention of identity documents.

2. Environmental protection, conservation of resources and local communities

Impacts on the environment and local communities are minimised

- Suppliers must conduct their business activities in a way that minimises their impact on the environment and local communities.
- Suppliers shall take reasonable steps to ensure that their business activities do not cause harmful soil changes, water pollution, air pollution, harmful noise emissions or excessive water consumption that significantly affect the natural resources used as a basis for the conservation and production of food.
- Suppliers must not damage a person's health, deny a person access to safe drinking water, or make it difficult or impossible for a person to access sanitary facilities through the Supplier's business activities.
- Suppliers shall ensure they respect the rights and interests of local communities and Indigenous peoples.
- Suppliers are encouraged to take reasonable steps to ensure their operations do not contribute to deforestation or land conversion.
- Land, forests and waters which serve as a person's means of livelihood, with particular regard to the rights of Indigenous peoples, may not be unlawfully seized or such persons may not be removed for the purposes of acquisition, construction or other use without their consent and the payment of adequate compensation in line with international standards.

Compliance with environmental laws, standards, regulations, permits and reporting

- Suppliers must comply with all applicable environmental laws, standards and regulations. This includes obtaining and complying with all applicable environmental permits, licences and other authorisations, and meeting any reporting requirements related to these.

Reduction of greenhouse gas emissions and energy consumption

- Suppliers are encouraged to set science-based targets aligned to 1.5 degrees Celsius of warming, take appropriate measures to reduce greenhouse gas emissions, minimise and if possible eliminate hazardous air emissions, and source renewable energy solutions where practical to do so.

Resources are optimised and used efficiently

- Suppliers are encouraged to take steps to increase the resource efficiency of materials used and minimise the use of natural resources in their business operations.
- Suppliers are encouraged to take reasonable steps to minimise the volume of waste and wastewater generated by their use of the land.
- Suppliers are encouraged to minimise negative impacts their operations have on nature and biodiversity.

Hazardous substances and waste are prohibited

- Suppliers shall comply with the regulations of the Minamata Convention⁷ to seek to prevent environmental damage and related risks. This includes prohibiting the manufacture of products containing mercury, the use of mercury and mercury compounds in manufacturing processes, and the treatment of mercury waste.
- Suppliers must comply with the bans on persistent organic pollutants ("POPs"), as set out in the Stockholm Convention⁸, in the production and use of chemicals.
- Suppliers shall handle, collect, store and dispose of waste in an environmentally sound manner in accordance with the requirements of the applicable legal system and the Stockholm Convention.
- Suppliers must comply with the prohibitions on the export and import of hazardous waste as defined in the Basel Convention.⁹

7. The Minamata Convention on Mercury is a global treaty to protect human health and the environment from the adverse effects of mercury and mercury compounds. More information on the Convention can be found [here](#).

8. The Stockholm Convention on Persistent Organic Pollutants is a global treaty to protect human health and the environment from chemicals that remain intact in the environment for long periods, become widely distributed geographically, accumulate in the fatty tissue of humans and wildlife, and have harmful impacts on human health or on the environment. More information can be found on the Convention [here](#).



3. Integrity, ethics and anti-corruption

Activities are conducted with high standards of moral and ethical conduct

- Suppliers must conduct their business activities with integrity, transparency and honesty, and in full accordance with all applicable laws and regulations, including competition, fair-trading and anti-corruption laws.

Committed to anti-bribery and anti-corruption

- Suppliers must not engage in any form of corruption, including bribery, extortion, money laundering, facilitation payments, kickbacks or other illegal or unethical gratuities.
- Suppliers are required to make decisions solely on a factual basis and must not be influenced by personal benefits and private financial interests.

Data is protected and kept confidential

- Suppliers must protect and safeguard personal and confidential information obtained in the course of their business relationship with T&G and to ensure compliance with all applicable laws, regulations and other standards relating to data protection and privacy in the collection, storage, use and disclosure of such information.

Insider trading laws are fully complied with

- Suppliers must comply with insider trading laws when they are in possession of information about T&G which could influence an investor's decision to buy or sell shares in T&G Global Limited.

Procurement requests

- Suppliers must, when engaging in T&G's procurement processes, act in good faith and respond with correct and accurate information.

4. Reporting and grievance mechanisms

Workers to have access to trusted and accessible mechanisms to report concerns safely, confidentially and anonymously

- Suppliers must provide their directors, employees, agents, contractors and other workers with a means to safely and anonymously make complaints relating to unsafe or unfair working conditions or any of the other issues covered by this Code.
- This should include either promoting T&G's SpeakUp line to workers (www.speakup-tandg.com) or establishing another trusted and accessible reporting mechanism.
- Workers must not be retaliated against or exposed to fear of retaliation for making a complaint. Suppliers must not take any disciplinary action or other adverse action against a worker for making a complaint.



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