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## APPLICABILITY TABLE



indicates the businesses, within the division, to which this document applies.

Australian Vinyls / ModWood



Kleenheat



WesCEF Support Services



Ammonia / Ammonium Nitrate



Sodium Cyanide



CSBP Fertilisers



## TABLE OF CONTENTS

<b>1.</b>	<b>PURPOSE</b> .....	<b>2</b>
<b>2.</b>	<b>SCOPE</b> .....	<b>2</b>
<b>3.</b>	<b>ROLES AND RESPONSIBILITIES</b> .....	<b>2</b>
3.1	EMPLOYEES .....	2
3.2	SUPPLIERS, CONTRACTORS AND CUSTOMERS .....	2
<b>4.</b>	<b>REPORTING OF NON-COMPLIANCES</b> .....	<b>3</b>
<b>5.</b>	<b>AUDITING AND DOCUMENTATION</b> .....	<b>3</b>
<b>6.</b>	<b>RELATED DOCUMENTS</b> .....	<b>4</b>
<b>7.</b>	<b>DOCUMENT MANAGEMENT</b> .....	<b>4</b>

### ANNEXURE A - MINIMUM STANDARDS

## 1. PURPOSE

Wesfarmers Chemicals, Energy & Fertilisers (WesCEF) is committed to the highest standards of conduct and ethics in our supply chain. WesCEF supports a culture of ethical behaviour amongst our Suppliers, in particular consideration of the welfare, safety and wellbeing of workers, and potential environmental impacts of activities.

The Ethical Sourcing and Modern Slavery Policy describes WesCEF's approach to monitoring and managing this process to ensure compliance to the *Australian Modern Slavery Act 2018* and the Wesfarmers Ethical Sourcing and Modern Slavery Policy.

## 2. SCOPE

This Policy applies to all business units and employees of WesCEF and all third parties, such as suppliers, contractors and customers of WesCEF and its business units.

## 3. ROLES AND RESPONSIBILITIES

### 3.1 EMPLOYEES

- All employees are expected to follow this policy and report any identified breaches through the appropriate channels.
- Ensure WesCEF and its business units are addressing modern slavery and ethical sourcing risks in their operations and supply chains, in line with the intent set out in the Wesfarmers Ethical Sourcing and Modern Slavery Policy.
- Identified key employees are required to complete Wesfarmers Modern Slavery training.
- May be requested by our Customers or suppliers to complete Ethical Sourcing & Modern Slavery questionnaires in accordance with legislative or voluntary requirements. Managers who understand our policy and procedure may complete these requests. It is recommended they are then reviewed by the WesCEF Commercial Manager Procurement, currently Greg Lister, [listerg@wescef.com.au](mailto:listerg@wescef.com.au) before being sent.
- In consultation with the Supply Department, facilitate the requirements of the WesCEF Ethical Sourcing & Modern Slavery audit program with suppliers and third party auditors.

### 3.2 SUPPLIERS, CONTRACTORS AND CUSTOMERS

#### Policy Requirements

- All Suppliers, Contractors and Customers are expected to take reasonable steps to comply with the Minimum Standards set out in Annexure A of this policy.
- All Suppliers, Contractors and Customers are expected to follow this policy and report any identified breaches through the appropriate channels.
- Risk assessment of Suppliers, Contractors and Customers may result in the need to participate in the WesCEF Ethical Sourcing & Modern Slavery audit program to demonstrate compliance with the *Australian Modern Slavery Act 2018* and the Wesfarmers Ethical Sourcing and Modern Slavery Policy
- Suppliers, Contractors and Customers who are unable to demonstrate a commitment to this policy, may be precluded from consideration of future business.

## Legal Requirements

- All Suppliers must be compliant with all local laws and regulations that covers as a minimum key issues being;
  - Compliance;
  - Social Responsibility;
  - Anti-Bribery and Corruption;
  - Environment and Sustainability;
  - Safety and Health; and
  - Responsible Procurement.

Suppliers must also be compliant with the legal requirements of the countries in which they operate.

## 4. REPORTING OF NON-COMPLIANCES

The Minimum Standards set out in Annexure A of this policy must be met by all employees and suppliers, WesCEF will consider a failure to comply with the standards a breach of the Policy and the Ethical Sourcing program. It is therefore expected that employees, suppliers or customers who become aware of known, suspected, or potential cases of non-compliance will make a report through the appropriate channels WesCEF has several channels for making a reports These include:

- Reporting to the WesCEF Chief Financial Officer, currently Aaron Hood, by phone (+61 8 9312 9234) or email [ahood@wescef.com.au](mailto:ahood@wescef.com.au)
- Reporting by post to c/- Level 14, Brookfield Place Tower 2, 123 St Georges Terrace, Perth, WA, 6000, Australia (marked to the attention of the Chief Financial Officer, WesCEF).
- Reporting the matter to the STOP line Whistleblower Service hotline, which is a confidential independent third-party reporting service. Stop line can be contacted on 1300 304 550.

Reports can be made anonymously, by phone call or written statement directed to the STOP line service.

The person reporting potential misconduct will be asked to provide details including the persons involved, how and when the misconduct occurred if known, and any evidence available in relation to the misconduct.

## 5. AUDITING AND DOCUMENTATION

As part of supplier Pre-qualification a an assessment of suppliers documentation including ethical sourcing and modern slavery policies and processes occurs to ensure compliance with WesCEF policy and regulatory requirements., WesCEF may, at its discretion, request an independent review of a Supplier's compliance with this policy via a more detailed risk assessment via the WesCEF Self Assessment Questionnaire (SAQ) or formally through the audit program..

Suppliers should ensure appropriate documentation and evidence is in place to demonstrate their use of effective ethical sourcing practices.

WesCEF must ensure appropriate processes are in place to effectively manage ethical sourcing and modern slavery issues raised.

Where non-compliances to this policy are identified, these must be remedied within appropriate timeframes, and verified by WesCEF Commercial Manager Procurement to ensure appropriate actions have been taken.

## 6. RELATED DOCUMENTS

- WesCEF Code of Conduct Policy (WCEF-PO-HRS-040-01)
- WesCEF Whistleblower Policy (WCEF-PO-HRS-000-02)
- WesCEF Ethical Sourcing and Modern Slavery Procedure (WCEF-PD-SUP-000-01)
- Wesfarmers Ethical Sourcing and Modern Slavery Policy (Last amended February 2019).

## 7. DOCUMENT MANAGEMENT

### Supersession

This policy supersedes all previous policies on Ethical Sourcing or Modern Slavery.

ANNEXURE A - MINIMUM STANDARDS	
No forced or bonded labour	<p>Employment shall be freely chosen. Suppliers shall:</p> <p>(a) not use any type of forced labour (any work or service extracted from any person under the menace of any penalty, 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) or indentured labour (in which an employer forbids workers from leaving employment at the worker’s discretion);</p> <p>(b) respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment; and</p> <p>(c) ensure that workers are free to leave their employer after reasonable notice.</p>
No child labour <sup>1</sup>	<p>Suppliers shall comply with the minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (ILO) Convention 138. Suppliers must be able to verify the age of all employees to ensure compliance. Suppliers must accept the principles of remediation of child and underage workers, and where such labour is discovered suppliers must establish and implement appropriate remediation<sup>2</sup> for such workers and introduce effective systems to prevent the use of child labour in the future.</p>

<sup>1</sup> ‘Child labour’ is defined as any work by a child or young person, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to interfere with that person’s education, or to be harmful to that person’s health or mental, spiritual, moral or social development. ‘Child (or Children)’ is defined as a person under the age of 15, or below the age at which school attendance is not compulsory under local law, whichever is older.

<sup>2</sup> ‘Principles of remediation’ is defined as a program enabling children and under age workers to return to quality education and establish and implement effective systems to prevent the use of child labour in the future.

Wages, benefits, and transparent record keeping	Suppliers must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits. Record keeping must be accurate and transparent. Workers must be provided with written and understandable information about their employment conditions before they enter employment and about their wages for each pay period. Deductions from wages for disciplinary measures or any deductions from wages not provided for by law shall not occur without the express permission of the worker concerned. All disciplinary measures should be recorded.
Working hours	Working hours must comply with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable ILO convention. Overtime shall be agreed, shall not be excessive, shall not be requested on a regular basis and shall be compensated as prescribed by applicable local laws.
No discrimination	All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation. Suppliers must 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.
No harassment or abuse	Workers shall be treated with dignity and respect. In particular, suppliers will provide a workplace free from harassment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.
Freedom of association grievance mechanisms and recourse	Suppliers shall respect the rights of workers to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country of operation. Workers should have the right to join or form trade unions of their choosing. Suppliers should not interfere with, obstruct or prevent legitimate related activities, such as collective bargaining. Workers are allowed to select worker representatives. Representatives should not be discriminated against and should have regular access to company management or appropriate process in order to address grievances and other issues. Suppliers must have a policy in place for workers to approach management on issues of concern, on their own or through worker representatives, confidentially.
Working conditions	Suppliers shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied, and workers trained in their use. Where suppliers provide accommodation it shall be clean, safe and meet the basic needs of workers. Workers will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation. Workers have the right to refuse work that is unsafe.
No bribery	Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise. Suppliers shall keep accurate records of all payments made and received in cash or in kind, for audit purposes.
Subcontracting	Where sub-contracting is permitted, suppliers must have adequate processes in place for properly managing sub-contracting to ensure that sub-contractors operate in accordance with this and any applicable divisional/business unit policy and is undertaken strictly in accordance with the contract.

Environmental compliance	Suppliers shall comply with relevant local and national environmental protection laws and will as far as practicably comply with international environmental protection standards. Suppliers warrant that supplied products are free from asbestos. Suppliers warrant that silica is not used in abrasive blasting practices.
Animal welfare	Suppliers must ensure animals are treated humanely and with respect.
Migrant workers	Migrant workers shall have the same entitlements as local workers as stipulated by local law. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer. The employer must not require the worker to surrender identification documents. Workers employed through a third party agent or contractors are the responsibility of the suppliers, and are thus covered by these Minimum Standards.
Hiring and regular employment	Suppliers must provide each worker with a clear, understandable labour contract containing all legally required employment terms, entitlements and conditions. In addition, where possible, suppliers should work towards providing permanent employment for workers and avoid labour-only contracting arrangements, consecutive short-term contracts, excessive piece-work or false apprenticeship schemes to avoid obligations of regular employment to workers.

Currency

This policy applies from the date of issue until it is replaced by another policy.

*For further information please contact Supply*

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<b>Title:</b>	<b>WESCEF ETHICAL SOURCING AND MODERN SLAVERY POLICY</b>
<b>Number:</b>	<b>WCEF-PO-SUP-0002</b>
<b>Version Number:</b>	<b>3.0.0</b>
<b>Date Revised:</b>	<b>10 June 2022</b>
<b>Owner:</b>	<b>Greg Lister</b>
<b>Authorizer:</b>	<b>Aaron Hood</b>
<b>Reasons for Creating or Amending Document:</b>	<b>New or Amended Company Policy</b>
<b>Actual Change Details:</b>	<b>Updated Policy as it was due for renew.</b>