

## POLICY

### Our Commitment to Social and Environmental Responsibility

Winning Appliances Pty Limited and each of its subsidiaries, collectively referred to as Winning Group, is committed to a culture of compliance, integrity, respect and care for our customers, our people, the environment, and the communities we operate in. We live and breathe our values and are on a mission to provide the best experience in the world, for the world, for our customers, communities, our people, and the planet. From this perspective we deeply respect individual circumstances and human rights. People are at the core of our business, and we recognise the impact we have on the daily lives of our customers, employees, suppliers, and their supply chains.

Whether it's shopping with us, working in our operations or being a supplier to our business, we want our stakeholders to know that we are actively working to manage and mitigate any negative social and environmental impacts of our business and supply chain. Afterall, we all live in the same world!

### The Purpose of the Supplier Code of Conduct

We want to collaborate with suppliers and partners who recognise that we all have a legal, social and environmental responsibility to manage and minimise the impact of our business operations and supply chains, and who are recognising the need to work towards transparency in supply chains. The purpose of this Supplier Code of Conduct is to outline not only minimum legal requirements but additional expectations of our suppliers and business partners.

We support and recognise the Universal Declaration of Human Rights and have formulated our policy with internationally recognised frameworks in mind, including the United Nations Guiding Principles of Human Rights, the Ethical Trade Initiative (ETI) Base Code, the International Labour Organisation, and the Responsible Business Alliance Code of Conduct.

### When Should the Supplier Code of Conduct be applied?

This Code of Conduct applies to all suppliers to the Winning Group of entities, including:

- Third party brands, such as distribution agents

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- Branded manufacturers
- Operational suppliers
- Suppliers to our own private label brands
- Service providers such as cleaning agencies and contractors

Supplier agreements shall reference this Code and the level of compliance with this Code.

### We are on the Journey with You

We recognise that these standards may be new to some suppliers, and we support continuous improvement of working towards our Supplier Code of Conduct. Many of these standards are already enshrined in law in many States, Territories, and countries around the world. If any of these standards cannot be met we ask for open and honest dialogue to understand your current position on these standards, if you plan to meet them in the future and your timeframe for doing so. We also understand that not all standards may be applicable to your business, if so, please advise which ones. We may request further information and audits and reserve the right to terminate the relationship, if improvements are not made in a timely and agreeable manner.

### Our Minimum Standards

#### 1. Labour

##### 1.1. Employment is Freely Chosen

- Forced, bonded (including debt bondage) or indentured labour, involuntary or exploitative prison labour, slavery, involuntary servitude, trafficking, or any other form of modern slavery of workers is prohibited. For the avoidance of doubt, modern slavery includes any conditions or practices similar to those prohibited under applicable laws, statutes, regulations, and codes.
- The withholding of bonds or deposits is prohibited.
- Workers are free to leave their employer after reasonable notice.

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### 1.2. Child Labour and Young Workers

- Child labour is strictly prohibited. Child labour is defined as work that deprives children of their childhood, the opportunity to attend school and fulfil their potential and that is harmful to their physical, moral, and mental development.
- Suppliers must be able to verify the age of all workers to ensure no child labour is used. All suppliers shall comply with the minimum legal working age in the country in question or by the ETI clause 4, whichever is higher.
- Workers under the age of 18 (Young Workers) shall not perform work that is likely to harm their health or safety, including night shifts and overtime, , as per ETI clause 4.3.

### 1.3. Working Hours

- Including any overtime, workers must not work above the maximum hours per week or per month as stipulated by local laws, or where local laws do not exist, a total of 60 hours in any 7-day period, as per ETI clause 6.4 and 6.5.
- Workers must have at least one day off in 7 days or two days off in every 14 days.
- Suppliers must keep an accurate and complete record of hours worked.
- All overtime must be voluntary must not be excessive or demanded on a regular basis and must be compensated as prescribed by local laws.

### 1.4. Wages and Benefits

- All workers must be paid in a timely manner and provided with a written wage statement; in a language they understand.
- Payment of wages and other benefits, including overtime, must comply with applicable laws including laws relating to minimum wages, overtime hours and legally mandated benefits and must be clearly communicated to workers prior to commencing employment.
- Deductions from wages may only occur if agreed in writing with the worker.
- Deductions from wages as a disciplinary measure is prohibited.

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### 1.5. Humane Treatment

- Harsh or inhumane treatment is prohibited including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers.
- Policies and disciplinary procedures upholding humane treatment, must be maintained and provided to workers.

### 1.6. No Discrimination

- All workers must be treated equally and without discrimination.
- Workers must not be discriminated based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in all hiring and employment practices such as wages, promotions, rewards, and access to training.
- Workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

### 1.7. Freedom of Association

- The rights of workers to lawfully associate with groups of their own choosing and to bargain collectively shall be respected, as well as the right of workers to refrain from such activities.
- Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management, regarding working conditions and management practices, without fear of discrimination, reprisal, intimidation, or harassment.

### 1.8. Migrant Workers

- Suppliers must ensure that migrant workers have the same entitlement as local workers stipulated by local law and under this Code.

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- Any commission and other fees due to a third-party agent or contractor in connection with employment of a migrant worker must be paid by the employer/supplier.
- All migrant workers must be provided with clear unambiguous information about their contract for employment, employment conditions, wages, and their written contract for employment in their native language.

### 1.9. Freedom of Movement

- Suppliers must not withhold worker's original identification and travel documents, or personal valuables. Suppliers must not impose unreasonable restrictions of movement within the workplace premises, or in supplier-provided accommodation.

### 1.10. Cultural Rights

- Workers cultural rights shall be respected, including the right to practice local and Indigenous culture and religions.

## 2. Health and Safety

### 2.1. Occupational Safety

- Workers must be provided with a safe and hygienic working environment that complies with local laws and regulations including, but not limited to fire protection, electrical and structural safety.
- The potential for health and safety hazards must be identified, managed, and mitigated.

### 2.2. Emergency Preparedness

- Workers shall be provided with training about physical safety, emergency evacuation and other basic training to cope with emergency situations.
- Adequate emergency plans and response procedures should be reviewed, tested and energy drills executed on a regular basis.
- Adequate, unlocked, accessible, and clearly marked emergency exits must be available at all times.

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### 2.3. Occupational Injury and Illness

- Policies and procedures should be in place to prevent, manage, track, and report occupational injury and illness.
- In accordance with local laws, workers should be provided with or granted the ability to access necessary medical treatment and rehabilitation services to facilitate their return to work.

### 2.4. Industrial Hygiene

- Worker exposure to chemical, biological, and physical agents should be identified, evaluated, and controlled.
- If any potential hazards were identified, participants shall look for opportunities to eliminate, reduce and control the potential hazards.
- When hazards cannot be adequately controlled by such means, workers should be provided with and use appropriate, well-maintained, personal protective equipment free of charge.

### 2.5. Physically Demanding Work

- Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks should be identified, evaluated, and controlled.

### 2.6. Machine Safeguarding

- Production and other machinery shall be evaluated for safety hazards.
- Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

### 2.7. Sanitation, Food, and Housing

- Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

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- Accommodation, where provided, should be clean and safe and meet the personal hygiene requirements of workers.

### 2.8. Health and Safety Communication

- All workers should be given health and safety information and training in the language they can understand.
- Health and safety related information should be clearly posted in the facility or placed in a location, identifiable and accessible by workers.
- Workers should be encouraged to raise any health and safety concerns without retaliation.

## 3. Environment

### 3.1. Environmental Permits and Reporting

- Any required environmental permits, approvals and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed in accordance with local laws and regulations.
- Suppliers are expected to have an understanding of the environmental impact of its business and consider community expectations regarding the impact.

### 3.2. Pollution Prevention and Resource Reduction

- Emissions and discharges of pollutants and generation of waste should be minimised or eliminated at the source.
- The consumption of natural resources, including water, fossil fuels, minerals, and virgin forest products should be reduced and the use of renewable and recyclable resources, implemented where feasible.

### 3.3. Hazardous Substances

- Chemicals, waste, and other materials posing a hazard to humans or the environment, are to be identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

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- Suppliers will not use restricted or banned substances of high or very high concern in manufacturing processes or in products as per the European Union (EU) Registration, Evaluation, Authorisation and Restriction of Chemical Substances (REACH).

### 3.4. Solid Waste

- Suppliers should implement a systematic approach to identify, manage, reduce and responsibly dispose of, or recycle solid waste (non-hazardous).

### 3.5. Air Emissions

- Harmful air emissions should be characterized, routinely monitored, controlled and treated as required prior to discharge, including in accordance with local legislation.
- Suppliers should conduct routine monitoring of the performance of their air emission control systems.

### 3.6. Materials Restrictions

- Suppliers are to adhere to all applicable laws, regulations, and customer requirements, regarding the prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

### 3.7. Water Management

- Water should be used as efficiently as possible.
- Suppliers shall ensure all outgoing wastewater from wet processes is appropriately treated to meet the requirements of local legislation before discharge.

### 3.8. Energy Consumption and Greenhouse Gas Emissions

- Suppliers should look for methods to improve energy efficiency and to minimise their energy consumption and greenhouse gas emissions.

### 3.9. Timber and Illegal Logging

- Suppliers should use Forest Stewardship Council (FSC) or Programme for the Endorsement of Forest Certification (PEFC) certified timber for their products.



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- Suppliers must provide certifications and other evidence, as requested by Winning Group, regarding the species of timber used, country of harvest and country of manufacture.
- Suppliers must meet the due diligence requirements for importing regulated timber products, under section 14 of the Illegal Logging Prohibition Act 2012 (Cth) and all other applicable laws.

### 3.10. Packaging

- Select suppliers must annually provide accurate packaging information data to aid Winning Group in complying with the Australian Packaging Covenant Organisation reporting requirements.
- Supplier selection and design of packaging must be aligned to the Sustainable Packaging Guidelines (SPG):
  - Design for recovery.
  - Optimise material efficiency.
  - Design to reduce product waste.
  - Eliminate hazardous materials.
  - Use recycled materials.
  - Use renewable materials.
  - Design to minimise litter.
  - Design for transport efficiency.
  - Design for accessibility.
  - Provide consumer information on sustainability.

### 3.11. Product Stewardship

- In accordance with the principles of product stewardship, suppliers shall identify and minimise risks and environmental impacts associated with their products during the production, distribution, and transport processes and throughout the product life cycle.

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- Mattress suppliers must be participants of the Australia Bedding Stewardship Council Bedding Stewardship Scheme in order to supply the Winning Group with mattresses.
- TV and computer products suppliers who are liable under the National Television and Computer Recycling Scheme (NTCRS) must fulfil their obligations under the Scheme including contributing to the funding of e-waste collection and recycling.

### 4. Ethics

#### 4.1. Business Integrity

- The highest standards of integrity are to be upheld in all business interactions.
- Suppliers shall prohibit any and all forms of bribery, corruption, extortion, and embezzlement.

#### 4.2. No Improper Advantage

- Bribes or other means of obtaining undue or improper advantage must not be promised, offered, authorised, given, or accepted.

#### 4.3. Disclosure of Information

- Suppliers must comply with all applicable laws and regulations regarding the disclosure of their financial position, performance, and any relevant business dealings.
- Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

#### 4.4. Intellectual Property

- Intellectual property rights should be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights and customer and supplier information, is to be safeguarded.

#### 4.5. Fair Business, Advertising and Competition

- Standards of fair business, advertising, and competition are to be upheld and meet local laws and regulations.

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### 4.6. Protection of Identity and Non-Retaliation

- Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers, are to be maintained, unless such disclosures are required by law.
- Suppliers should have a communicated process for their personnel, to be able to raise any concerns without fear of retaliation.

### 4.7. Responsible Sourcing of Minerals

- Suppliers should exercise due diligence when sourcing raw materials, to reasonably ensure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas, or an equivalent and recognized due diligence framework.

### 4.8. Privacy

- All personal and sensitive information must be treated and protected in accordance with relevant privacy laws and regulations.

## 5. Management and Reporting Compliance

- The supplier shall assign responsibility and accountability for compliance with this Code of Conduct to a member of the executive management team or their delegate.
- The supplier shall have a system, policy and process in place to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code. This includes but is not limited to:
  - Periodic supplier assessment through supplier questionnaires, internal audits or independent third-party audits.
  - A victim centred remediation process to ensure any non-compliances with local laws or this Code are adequately addressed and prevent the non-compliance from reoccurring in future.
- Any questions regarding this policy shall be directed at your procurement or buying contact at Winning Group.

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- If you wish to inform Winning Group of any known or suspected issues of non-compliance with this policy, please contact [winninglegal@winning.com.au](mailto:winninglegal@winning.com.au).
- You are also able to anonymously report through our Whistleblower channel: [speakup@coreintegrity.com.au](mailto:speakup@coreintegrity.com.au) or call 1800 324 775.

### 6. Acknowledgement

We acknowledge and understand Winning Appliances Pty Limited and each of its subsidiaries, collectively Winning Group, standards and expectations when providing goods or services.

**Supplier Organisation's Name:** \_\_\_\_\_

**Supplier's Contact Name:** \_\_\_\_\_

**Title:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Location:** \_\_\_\_\_

**Signature:** \_\_\_\_\_