



## **Costa Group Holdings Limited**

### **Supplier Code of Conduct**

#### **1 Purpose**

The purpose of this Supplier Code of Conduct (**Supplier Code**) is to articulate Costa's expectations and requirements for all Suppliers.

#### **2 Our Commitment**

Costa values integrity and honesty in its business and seeks out these qualities in its partners and employees. By valuing and rewarding character, Costa will ensure the sustainability, development and profitable growth of its business.

Costa seeks to engage in business with other likeminded persons and entities that share the same principles and values. Costa requires its Suppliers to comply with all applicable laws and, in all cases, to meet the standards and principles set out below. Compliance with such laws, standards and principles is a material consideration for us in assessing every aspect of its Supplier relationships.

#### **3 Definitions**

For the purpose of this Supplier Code:

**Costa** means Costa Group Holdings Limited and its subsidiaries.

**Human Rights** means the principles enshrined in the United Nations Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and the International Labour Organisation's (**ILO**) Declaration on Fundamental Principles and Rights at Work.

**Second Tier Suppliers** are suppliers that provide goods and services to Costa's Suppliers (as defined below).

**Suppliers** means all third party suppliers, growers, consultants, business partners and contractors engaged to supply goods or services to or on behalf of Costa or its subsidiaries.

#### **4 Scope**

Costa requires that Suppliers comply with, and ensure their employees, contractors, consultants and Second Tier Suppliers are advised of and comply with, this Supplier Code.

#### **5 Principles**

Costa expects Suppliers to act at all times in an ethical manner by conducting themselves professionally and consistently with the following principles:

- **Diversity and Inclusion**

Costa values and supports diversity, equal opportunity and inclusion and strives to achieve and maintain diversity, equal opportunity and inclusion in its workplace and expects Suppliers to do the same.

Suppliers must not discriminate on the basis of race (including colour, descent, nationality or ethnic origin), religion, religious belief or activity, sex, pregnancy, marital/domestic status, family responsibility or parental status, breastfeeding, age, disability, medical record, physical features, personal association, trade union or industrial activity, lawful sexual activity, sexual orientation, gender identity or intersex status. Such discrimination will not be tolerated by Costa.

Costa respects the importance of the culture, heritage and traditional rights of Indigenous Australians, and requires its Suppliers to do the same.

- **Anti-Bribery and Corruption**

Suppliers must comply with all applicable laws relating to bribery, corruption, money laundering, fraud, tax evasion or similar activities (including, where relevant the *Australian Criminal Code Act 1995* (Cth), the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977).

Suppliers must seek to identify and report any conflicts of interest, be it competing personal or professional interests.

As set out in its Whistleblower Policy, Costa employs mechanisms to encourage concerns to be raised about misconduct, malpractice, irregularities or any other behavior which is dishonest, corrupt, illegal or inconsistent with any of Costa's values or policies, including this Supplier Code. Costa's Suppliers must ensure, if required by law, that they have legally compliant whistleblowing procedures and that whistleblowers are protected from victimisation.

- **Health and Safety, including Safe Working Conditions and Fair Wages/Compensation**

Costa is committed to the ongoing protection of its people, assets and environment. This commitment extends to protecting the health, safety and wellbeing of its employees, contractors and visitors in the workplace.

Costa requires that Suppliers strictly adhere to all relevant health and safety and workplace laws and strive to create a safe and hygienic working environment for their employees and anyone else affected by their operations, which is free from harassment and abuse. Suppliers must ensure that all workers are inducted and trained in safe work practices and principles prior to the commencement of any work.

Working hours must comply with all applicable laws and overtime shall be voluntary, and shall not be excessive.

Suppliers must meet all of their legal obligations when paying the people they employ and must provide all legally mandated benefits.

To the extent permitted by law, Suppliers who employ migrant workers shall ensure that they are treated ethically and receive exactly the same entitlements as local employees. Any accommodation, food, transport or similar services provided by or on behalf of a Supplier to its workers must be provided at no cost or at rates that are no higher than fair market rates having regards to the standard provided. To the extent that a Supplier or a related entity of a Supplier provides, solicits or in any way facilitates the provision of accommodation to the Supplier's workers whilst they are engaged to work at Costa sites, all such accommodation will meet all Federal, State and Local Government approvals, regulations and licences and any additional accommodation guidelines notified by Costa.

Any commissions and other fees in connection with employment of migrant workers must be covered by the Supplier rather than the employee. Suppliers must not retain original identification documents of their employees or prospective employees. Where a Supplier uses a labour hire provider, it will require the labour hire provider to comply with these terms and to maintain accurate and transparent records.

Costa will not accept and strives to eliminate any form of discrimination, bullying, vilification or harassment and holds Suppliers accountable for work standards and conduct. Suppliers must not engage in or support the use of corporal punishment, threats of violence or any form of mental or physical coercion.

Suppliers must provide an avenue for workers' grievances to be heard, fairly investigated and where required appropriate remedial action should be taken.

- **Immigration Law Compliance**

Suppliers shall only employ workers with a legal right to work in the relevant jurisdiction, including workers engaged through a labour hire or employment agency. A worker's legal right to work must be validated by reviewing original documentation prior to the commencement of work at regular intervals having regard to the worker's visa and work permit requirements.

- **Human Rights and Modern Slavery**

Costa is opposed to and will oppose all forms of modern slavery, including forced or compulsory labour, trafficking in persons, debt bondage, indentured labour, prison labour and child labour, both within its operations, and its supply chain. Costa requires Suppliers to respect Human Rights and ensure that they are not complicit in Human Rights abuses.

Suppliers must not engage, or be complicit in, any practices of modern slavery. No-one should be made to work through force or intimidation of any form.

Suppliers must ensure the Human Rights of all their workers are protected. For clarity this includes that accommodation and services provided must be to a standard that is suitable for health and wellbeing, providing the workers and their families with dignity.

- **Environment and Sustainability**

Costa is committed to sustainable agriculture and seeks to promote the use of Australia's natural resources in an environmentally responsible and efficient manner. Suppliers must comply with all applicable environmental laws and continually strive to improve their

sustainability performance, focusing on reduction (as appropriate) of waste, carbon emissions, water and natural resources consumption. Suppliers must maintain an appropriate environmental management system that identifies and manages environmental impacts.

- **Second Tier Suppliers**

Costa expects that all Suppliers have robust management processes in place for properly managing their own subcontracting so they can ensure that Second Tier Suppliers operate in accordance with this Supplier Code.

## **6 Compliance with this Supplier Code**

Costa expects Suppliers to respect and be accountable for compliance with this Supplier Code and to develop the necessary tools, record-keeping and management systems to support this compliance.

Costa may require Suppliers to conduct self-assessments and Costa reserves the right to undertake due diligence and/or risk assessments and take other steps to verify compliance with this Supplier Code. Costa expects Suppliers to cooperate and provide supporting evidence as it may reasonably require to monitor and review their compliance.

Suppliers must comply with this Supplier Code, monitor compliance, notify Costa of any breaches and take reasonable steps to address, remedy and prevent reoccurrence of any breach of the Supplier Code principles.

Breach of this Supplier Code may result in Costa terminating its relationship or agreement with a Supplier.

## **7 Further Information**

Any person may report a concern in relation to a potential breach of this Supplier Code pursuant to Costa's Whistleblower Policy.