



## **Supplier Code of Conduct**

### **Sustainability**

#### **Introduction**

The Willows Group is committed to the highest standards of business and ethical behaviour in fulfilling our responsibilities to the communities which we serve and the creation of long term value for all stakeholders on a socially and environmentally sustainable basis. We are committed to the responsible sourcing of goods and services and this Supplier Code of Conduct sets out our expectations of those who provide these goods and services to the Group

In this context, The Willows Group has instituted the ESG (Environmental, Social and Governance) Code of Conduct for Suppliers (the “Code”) which sets the ESG expectations from its suppliers, manufacturers, vendors, sub-contractors, and others who work with The Willows Group (collectively referred to as “Suppliers”). The Code will serve as a mechanism for The Willows Group suppliers to operate ethically and in compliance with the law.

#### **Purpose and Scope**

This Code of Conduct sets out the minimum standards we expect and we encourage all suppliers to go beyond these requirements.

Suppliers shall apply these requirements to their own suppliers, contract labour providers and approved sub-contractors with whom they work to supply goods and services to The Willows Group, ensuring compliance with the letter and spirit of this code. These principles form part of the supplier selection process and are subject to continued monitoring. Where there is a pre-existing relationship with a supplier, the requirements of this code are in addition, and not in lieu of, any legal or contractual agreement between that supplier and The Willows Group.

#### **Obey the law of the land**

The Willows Group expects its suppliers and their sub-suppliers to maintain complete awareness and fully abide by all the applicable laws and regulations, directives and guidelines and all obligations in any contract that the supplier has with The Willows Group. This will be including but not limited to environment, employment labour, health and safety, human rights and governance. The suppliers will be responsible for



highlighting and alerting The Willows Group of any non-compliances, penalties, fines, and warnings that may be received by them from the competent authorities.

Suppliers shall respect the rights to land tenure of local communities and indigenous peoples impacted by its operations, including its raw material sourcing, and will adhere to the principle of Free, Prior and Informed Consent.

### **Conflict Minerals**

The Willows Group expects its suppliers and their sub-suppliers take steps to ensure complete transparency in terms of the origin of minerals used for production of manufactured goods supplied to The Willows Group. Its suppliers should ensure minerals used in production of manufactured goods supplied to The Willows Group are not sourced from conflict-affected areas and/or support/fund conflicts.

### **Human and labour rights**

The Willows Group expects its suppliers and their sub-suppliers to address impacts on human and labour rights. We expect suppliers to treat all employees fairly, honestly and with respect, in full compliance with the following requirements:

- **Child Labour** - Suppliers shall not permit the use of child labour. No child below the age for finishing compulsory schooling, or 15 years of age (whichever is the greater) may be employed by a supplier, subject to ILO exceptions (International Labour Organisation's).

Where young people under the age of 18 are employed, suppliers will ensure that their work is not likely to be harmful to their health and/or development, including no working under hazardous conditions and ensuring compliance with all applicable laws.

- **Forced Labour, bonded labour and modern slavery** - Suppliers and their sub-suppliers will prohibit use of forced, bonded or involuntary and prison labour in any form across their organisation. Suppliers are to ensure that its sub-suppliers and workers have legal right to perform work at the supplier premises. Workers shall enjoy the freedom of movement during their employment and have the freedom to terminate employment after the agreed notice and the supplier shall not withhold any original documents such as identify, immigration, work permit, personal belongings, financial guarantee, or wages, beyond reasonably necessary for administrative reasons. Suppliers are expected to provide written agreement to its employees describing the workers' terms of employment in a language understood by the worker.



- **Wages** - Suppliers are required to inform workers about their employment terms and conditions in writing and in an understandable manner before they enter into employment.

Suppliers shall ensure that their employees are fairly compensated. At a minimum, compensation must comply with all applicable wage and hour laws, or industry standards approved on the basis of collective bargaining, whichever is higher. Suppliers should aim to provide compensation for a regular work week that is sufficient to meet workers' basic living needs and provide some discretionary income.

Deductions to wages shall only be made in accordance with applicable law or under collective agreement and all workers will be provided with clear and written details of their wages each time they are paid.

- **Working Hours** - Suppliers must provide for working hours that comply with national laws and industry standards. Regular hours worked shall not typically exceed sixty hours per week (including overtime) and workers will be provided with one day off in every seven day period.  
Overtime shall be voluntary and compensated at a premium rate. All overtime related practices will be conducted in accordance with applicable laws and regulatory standards.
- **Occupational Health & Safety** - Suppliers shall ensure all employees work within safe and humane conditions, including providing adequate training and effective protective equipment to safely carry out their duties. Suppliers will also provide access to clean toilet facilities, potable water and sanitary facilities for food storage.  
Facilities must be constructed and maintained in accordance with applicable laws and regulations. Accommodation, where provided, shall be clean, safe and meet the basic needs of workers while respecting their dignity. Suppliers will also ensure that there are appropriate exits, procedures and equipment in place to deal with emergency situations.
- **Discrimination and Equal Opportunity** - The Willows Group expects its suppliers and their sub-suppliers to treat its employees fairly and take steps to promote diversity and ensure a healthy working environment free from discrimination in hiring, compensation, access to training, promotion, wages, retirement, working conditions, assignments, benefits and discipline based on personal characteristics including but not limited to ethnic background, race, religion, age, gender, disability, sexual orientation, outlook or social status.
- **Freedom of Association and Collective Bargaining** - Suppliers and their sub-suppliers should allow its employees to associate freely, bargain collectively and seek representation in accordance with local laws. Suppliers should not



discriminate against representatives and employees who choose to affiliate or not to affiliate with the respective associations.

- Harassment and Abuse – The Willows Group expects its suppliers and their sub-suppliers to treat its employees with respect and dignity. Factories should have a harassment-free workplace, which can take many forms including physical, sexual, verbal, or visual activity that generates an atmosphere that is offensive, aggressive or threatening.
- Grievance Redressal – The Willows Group expects its suppliers and their sub-suppliers to ensure that their employees have a proper channel to report grievances to the management maintaining anonymity and confidentiality. The grievance redressal system should include addressing grievances in a timely manner and documenting management's action on grievances.

### **Environment**

The Willows Group expects its suppliers and their sub-suppliers to conduct their business operations and supply products or offer services to The Willows Group in a manner that doesn't have significant negative impact on the environment. Suppliers to The Willows Group shall carry out operations with care for the environment and at a minimum will comply with all applicable environmental laws and regulations.

The Willows Group expects suppliers to make progressive improvements in their operations and through adoption of good operating practices, to ensure the responsible use of natural resources, cleaner production, pollution prevention and the creation of products with lower environmental impacts.

The Willows Group recognises the right to water and suppliers must implement practices to ensure good water stewardship, including optimising the use of water onsite, employing adequate wastewater or effluent controls to protect the surrounding environment and ensuring withdrawals do not adversely impact on the needs of local communities and other water users.

Suppliers are required to be transparent about their raw material sourcing practices and will share upon request relevant traceability information.

### **Compliance**


The Willows Group requires suppliers to ensure their operations comply with all applicable laws and regulations at a minimum. Furthermore, we expect that all suppliers adhere to The Willows Group requirements, including the standards as laid out in this Supplier Code of Conduct.



Suppliers shall have the appropriate processes and systems in place to do so, including a means for the confidential reporting of concerns about misconduct or unethical behaviour and an appropriate mechanism to remedy adverse impacts. Where issues are identified through internal reporting, whistle-blowers will be protected from any negative repercussions. Similarly, suppliers shall not tolerate threats, intimidation, physical or legal attacks against human rights defenders.

Suppliers shall cooperate with The Willows Group to allow them, or any authorised third party, to conduct audits to verify compliance with these standards or other required certifications. In the event that deficiencies are identified, the supplier will take the steps necessary within an acceptable timeframe to correct any deficiency to The Willows Group' satisfaction. Suppliers shall immediately report any concerns about compliance with legal requirements or any aspect of this code, to their designated point of contact at The Willows Group.

Where suppliers are found to have contravened the requirements set out in this Code, The Willows Group reserves the right to terminate any associated agreement or business relationship.

Signed by:		Date:	11/11/2024
Name:	David Scrivens		
Job Title:	Managing Director		