

Ethical Sourcing and Modern Slavery Policy

PURPOSE

Business plays an important role in respecting and promoting human rights as well as eradicating modern slavery. We recognise that modern slavery is a growing and complex problem, best tackled by a collective commitment and responsibility to bring the issue to an end and we are committed to working with all our stakeholders to fulfill this common goal. If the policy is breached, we will act as quickly as practicable to remedy our adverse impacts on workers, individuals or communities and we will engage directly with affected stakeholders.

The Australian Modern Slavery Act 2018 took effect on 1 January 2019.

The purpose of this Policy is to ensure that Dynamite:

- is compliant with local, national and other applicable laws and regulations in the areas in which the businesses operate;
- sources products and services in accordance with legal obligations and community expectations while working with suppliers to improve their social and environmental practices;
- act to prevent, mitigate and where appropriate, remedy modern slavery in their operations and supply chains.

POLICY APPLICATION

The principles of this policy must be complied with or incorporated into policies within the business.

POLICY

As far as practicable, suppliers must be:

- (i) encouraged to exceed the Minimum Standards, and promote best practice and continuous improvement; and
- (ii) monitored for compliance with the Minimum Standards through supplier assessment processes as appropriate, taking into account all relevant risk factors such as country risk and product risk.

Minimum Standards

No forced or bonded labour

Employment shall be freely chosen. Suppliers shall:

- (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);
- (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
- (c) ensure that workers are free to leave their employer after reasonable notice.

No child labour

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 under age workers, and where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce 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.

'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. 'Young Person' is defined as a person under the age of 18 but not classified as a child.

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.

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.

Sub-contracting

Where sub-contracting is permitted, suppliers must have adequate processes in place for properly managing sub-contracting to ensure that subcontractors 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 practicable comply with international environmental protection standards.

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.

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.

On-boarding and contracting

We must perform due diligence on new suppliers to determine their risk level and control procedures in relation to ethical sourcing and modern slavery as appropriate for its business.

Audit and compliance program

Dynamite must assess suppliers through their audit/compliance program to confirm compliance with this policy. We will involve relevant personnel or external providers trained in conducting audits when required.

Training must ensure that team members with relevant roles in relation to the policy receive adequate training on the policy and any supporting processes applicable to their role.

Complaints mechanism

We have an accessible reporting mechanism for concerns or disclosure in relation to modern slavery which allows for confidential and anonymous reporting and provides protection from reprisal.

Remediation

We are committed to working with suppliers to remediate any breaches of this policy.

Review

We will monitor and annually review the effectiveness of the risk management measures described above.