

ETHICAL SOURCING POLICY

1.0 PURPOSE

- 1.1 Bradken is committed to upholding human rights, fair working conditions and environmental protection. In accordance with the expectations of our customers, the community, and the requirements of the regulatory authorities, we strive to always operate responsibly within the community and we expect the same from our suppliers.
- 1.2 Maintaining a reputation for the highest legal, moral and ethical standards in our dealings with our customers and other key stakeholders is critical for our ongoing success. This Policy has been developed to complement our core values as described on Bradken's Code of Conduct and Ethics (*Ref: 2 BK SP MS*).

2.0 INTRODUCTION

- 2.1 Bradken aims to provide its customers with quality products and value for money. In today's global market, this means sourcing products from a variety of locations nationally and internationally. In recent years, concerns over poor working conditions and environmental degradation in developing countries and emerging markets have seen companies implement specific social and environmental criteria for the production facilities from which they source products.
- 2.2 In order to address these concerns, Bradken has introduced its Ethical Sourcing Policy to ensure it is:
- sourcing its products in a responsible manner;
 - working with its suppliers to improve their social and environmental practices;
 - providing clear guidance to its buying staff; and
 - protecting its corporate reputation, the reputation of its individual businesses and their brands.

3.0 RESPONSIBILITIES

- 3.1 All employees, contractors and suppliers are expected to support the ethical standards set out in this Policy with regard to workplace safety, environment, and fair pay and employment conditions.
- 3.2 The Policy establishes the Guidelines and standards that we expect all of our suppliers to comply with when producing and supplying products to Bradken, no matter where their products are manufactured. Our suppliers must commit to complying with the Guidelines, many of which are drawn from the Ethical Trading Initiative (ETI) and International Labour Organisation (ILO) Conventions. These requirements represent minimum standards based on the principles of the United Nations Universal Declaration of Human Rights.

4.0 GUIDELINES

4.1 **Bribery and Corruption**

Suppliers shall not engage in acts of bribery and corruption and shall not falsify documents and records.

4.2 **Labour Rights**

Employment is freely chosen and there is no forced, bonded or involuntary prison labour.

Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

4.3 Freedom of Association and the Right to Collective Bargaining are Respected

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

4.4 Working Conditions

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health in the working environment.

Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

Access to clean toilet facilities and clean and drinkable water and, if appropriate, sanitary facilities for food storage shall be provided.

Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

Suppliers will ensure that personal protective equipment is available and workers are trained in its use. Safeguards on machinery must meet or exceed local laws.

Suppliers shall assign responsibility for health and safety to a senior management representative.

4.5 Child Labour

Bradken supports ILO Convention 138 with regard to the appropriate age of workers and will not work with suppliers who use child labour. Child labour refers to work that:

- a. is mentally, physically, or morally harmful to children;
- b. can negatively affect their mental, physical, or social development, and
- c. interferes with their schooling:
 - by depriving them of the opportunity to attend school;
 - by obliging them to leave school prematurely; or
 - by requiring them to attempt to combine school attendance with excessively long and heavy work.

In short: child labour is work that deprives children of their childhood, their potential and their dignity, and is harmful to their physical and mental development.

4.6 Living Wage

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry

benchmark standards, whichever is higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.

All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

Deductions from wages as a disciplinary measure or any deductions from wages not provided for by law shall not occur without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

4.7 Working Hours

Working hours comply with any law and benchmark industry standards, whichever affords greater protection.

In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven day period on average. Overtime shall be voluntary, shall not be excessive, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

4.8 Discrimination

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4.9 Regular Employment

To every extent possible, work performed must be on the basis of recognised employment relationship established through national law and practice.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

4.10 Harsh or Inhumane Treatment

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

4.11 Entitlement to Work and Immigration

Only workers with a legal right to work shall be employed or used by the supplier.

All workers, including employment agency staff must be validated by the supplier for their legal right to work by reviewing original documentation.

The supplier shall implement processes to enable adequate control over agencies with regards to the above points and related legislation.

4.12 Sub-contracting and Home Working

There shall be no sub-contracting unless previously agreed with Bradken.

Suppliers must have adequate processes in place for properly managing sub-contracting and home working to ensure sub-contractors do not abuse, exploit or provide unsafe working conditions for their employees.

4.13 Environment Compliance

The facility shall comply with national and local environmental laws and regulations.

The facility shall dispose of its production waste in accordance with local environmental laws and regulations.

The facility must have identified and documented its key environmental impacts and implemented controls to minimise its impact on the environment with respect to solid waste disposal, hazardous chemicals storage and management, air and water emissions.

5.0 COMPLIANCE

Bradken expects its suppliers to comply with all aspects of this Policy, and will be extending its coverage of audited facilities and compliance monitoring processes to include these standards.

Bradken is committed to working in partnership with its suppliers to help achieve compliance with this Policy. In the event where any supplier is unwilling or unable to demonstrate continuous improvement towards full compliance with our standards, the trading agreement between Bradken and the supplier will be terminated.

6.0 REFERENCE DOCUMENTATION

2 BK SP MS

Code of Conduct and Ethics

2 BK ST CG

Corporate Social Responsibility Policy