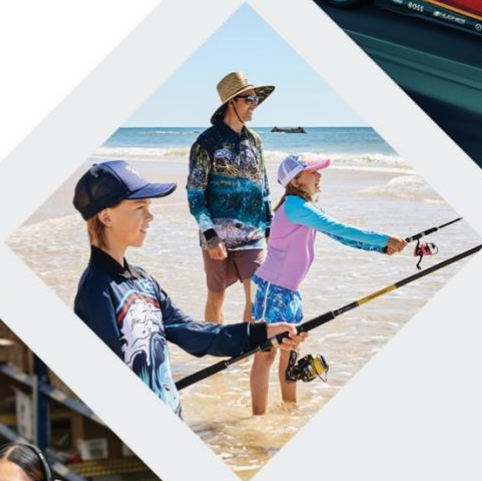
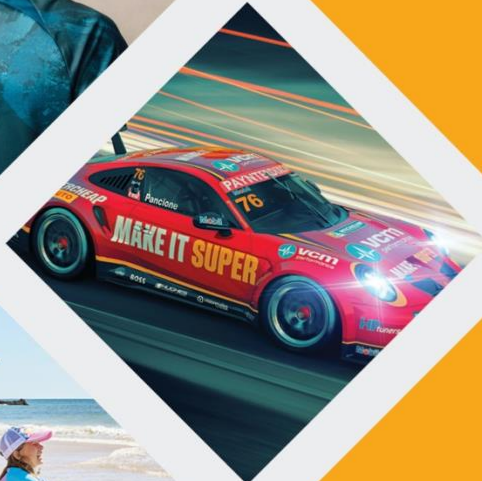


**20 RESPONSIBLE
24 SOURCING CODE**



Inspiring you to
live your passion

CEO's Foreword

At Super Retail Group (the "Group"), we are committed to environmental, social and governance initiatives and practices that benefit our team members, customers, trade partners, service providers, supply chains and the communities in which we operate.

As a fundamental expectation of business in today's world, responsible sourcing is one of five key priority areas in our Sustainability Framework. We recognise that we play an important role in upholding and promoting responsible and ethical business practices across our operations and supply chains.

We have a responsibility to:

- **Conduct business with integrity**, honestly, transparently, in compliance with laws and our Group policies;
- **Respect human rights, labour standards** and fair working conditions to protect the people across our operations and supply chains; and
- **Implement environmental protection** and management measures to reduce our impact on the planet (and people).

Given the complexity of our supply chains we expect our Trade Partners and Service Providers to share our commitment to working together to enhance compliance, provide remedy as applicable, and deliver improved outcomes. It means taking a zero-tolerance approach to unacceptable behaviours and responsibly disengaging from business relationships where necessary.

Our expectations to meet these responsibilities are outlined in our [Human Rights and Responsible Sourcing Policy](#) (the "Policy") and this Responsible Sourcing Code (the "Code"). We need our suppliers and associated supply chains to abide by these requirements not only to meet community expectations but because it is good business practice and, most importantly, the right thing to do.

Your commitment and co-operation to uphold this Code are appreciated. Together, I look forward to building long-lasting partnerships for sustainable development and responsible practices across our businesses.



Anthony Heraghty
Group Managing Director and Chief Executive Officer

1 About the Responsible Sourcing Code

1.1 Purpose

The purpose of this Responsible Sourcing Code ('Code') is to support implementation of Super Retail Group's (the 'Group') Human Rights and Responsible Sourcing Policy ('Policy') and provides further details on our requirements.

The Group's Policy and this Code communicate our commitment to source products and services responsibly and by upholding human rights and fair working conditions of the people working in, or contributing to, our operations and supply chains. We are committed to conduct business with integrity and strive to protect the environment.

This Code also supports our corporate governance and due diligence processes for Responsible Sourcing including human rights. We are a signatory to the United Nations Global Compact and this code is aligned with various international standards and relevant conventions, including:

- The International Bill of Human Rights;
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work (and supporting core conventions) which include:
 - freedom of association and the effective recognition of the right to collective bargaining;
 - the elimination of all forms of forced or compulsory labour;
 - the effective abolition of child labour;
 - the elimination of discrimination in respect of employment and occupation; and
 - a safe and healthy working environment;
- The United Nations Global Compact's (UNGC) principles on human rights, labour, environment and anti-corruption;
- The United Nations (UN) Guiding Principles on Business and Human Rights; and
- The UN Sustainable Development Goals.

The Group also has obligations as a reporting entity under the Modern Slavery Act 2018 (Cth). Our Modern Slavery Statement is one of the ways that we demonstrate our ongoing commitment to human rights and responsible sourcing.

1.2 When to use this Code

The scope of this Code includes:

Super Retail Group, its wholly owned subsidiaries (Group) and team members including, officers, volunteers, work experience students, contractors, and labour-hire workers; and

- Trade Partners and Factories (including their operations and supply chains relevant to the Group) that supply:
 - Private Brand Products or Non-Stock goods where the Group owns the Brand or trademark (i.e. products or goods with the Brand's name, trademark or logo on them). It is applicable whether manufacturing is overseas or domestically in Australian or New Zealand;
 - Non-Private Brand Products or Non-Stock goods where the Group directs, arranges or contributes to the manufacturing of the product (including products that only the Group is permitted to make); and
 - Non-Private Brand Products where the Group is the importer of record (also called direct imports).
- Service Providers to the Group.

The above are collectively referred to as "Suppliers".

Other suppliers of Non-Private Brand Products or Non-Stock goods outside the abovementioned scope are expected to meet the requirements of the Policy and this Code and are responsible for their own due diligence and compliance commensurate to the level of risk throughout their operations and their supply chains. The Group may at times require additional information or verification records to demonstrate compliance with this Code when necessary.

A signed Contract, General Business Agreement or Terms of Trade, acceptance of a purchase order and/or provision of products/services to the Group constitutes confirmation of continuing compliance with the Policy and this Code.

2. Business integrity

The Group is committed to engaging in ethical business relationships. Bribery, fraud, corruption, anti-competitive behaviour, conflict of interest or other conduct that impacts the business integrity of the Group, Trade Partner, Service Provider or associated supply chains will not be tolerated.

2.1 Legal compliance

Suppliers must:

- 2.1.1 Comply with relevant laws applicable to the jurisdictions in which they operate. When applicable laws and the Group's requirements differ, the stricter requirements for the Supplier will apply.
- 2.1.2 Have valid business licences, applicable permits and certifications as relevant to their operations.

2.2 Bribery and corruption

Suppliers must:

- 2.2.1 Not give, offer, accept, or request bribes, facilitation payments, secret commissions, gifts, gratuity, entertainment or any other type of illegal payments or unfair advantages to win and/or keep business or influence auditors, assessors or inspectors.

2.3 Transparency and reporting

Suppliers must be open and honest in dealings with the Group and Group's representatives and:

- 2.3.1 Disclose and provide access to their policies, processes, relevant information, documentation and records to the Group, auditors or an affiliated partner of the Group when requested. This could include information on their relevant supply chains.
- 2.3.2 Give the Group, an auditor or affiliated partner of the Group access to its premises (including dormitories where applicable) and workers.
- 2.3.3 Facilitate any worker interview or processes conducted by the Group, auditors or affiliated partner of the Group without intervention or influence.
- 2.3.4 Report, as soon as they become aware of any actual, suspected or potential instances of child labour, forced labour, trafficked labour, and slavery indicators such as debt bondage (recruitment fees), deceptive recruitment, withholding of personal identification document or payments, significant legal breaches or significant incidents in their operations or supply chain to the Group by emailing: responsiblesourcing@superretailgroup.com or in accordance with the Group's [Whistleblower Policy](#) via the Group's [Integrity Line](#) integrityline@superretailgroup.com.

Note: For Trade Partners that are directly managed by Macpac, this notice can be sent to the Macpac email address - rsc@macpac.co.nz or via the Group's [Integrity Line](#).

3. Human rights and labour standards

The Group is committed to upholding human rights for our Team Members, Trade Partners, Service Providers, and those in our supply chains, and it aligns its requirements for Suppliers with the ILO Declaration on Fundamental Principles and Rights at Work. The use of child labour, any form of modern slavery or forced labour, restricting freedom of workers, mistreatment of workers and jeopardizing the health and safety of workers in our supply chains are unacceptable.

3.1 No Forced Labour (Employment is freely chosen)

Suppliers must:

- 3.1.1 Under no circumstances use, or in any other way benefit from, any form of forced, trafficked, bonded, indentured, involuntary labour, or involuntary prison labour in line with ILO Convention No. 29 on Forced Labour and ILO Convention No. 105 on Abolition of Forced Labour.
- 3.1.2 Comply with modern slavery laws applicable to their jurisdiction as well as those applicable to the supply of products or services to the Group, including the provision of required supporting documentation, records and any reporting requirements.
- 3.1.3 Have policies, processes and controls in place to prohibit forced labour and modern slavery in their operations and supply chains and provide for appropriate remedy, in line with the UN Guiding Principles of Business and Human Rights, in the event of non compliance with this Code.
- 3.1.4 Not compel people seeking employment at their facilities to work through force, deception, intimidation, coercion or as a punishment for holding or expressing political views.
- 3.1.5 Only use or employ workers with the legal right to work in the jurisdiction the work is carried out.
- 3.1.6 Validate that workers, including employment agency staff, have a legal right to work by reviewing original documentation and implement processes to enable adequate control over agencies with regards to the above points and related legislation.
- 3.1.7 Pay the full cost of recruiting workers and not require workers to pay recruitment related fees or service charges. Where it is identified that fees have been paid by the worker, the employer must promptly reimburse costs back to the worker.
- 3.1.8 Not require workers to lodge deposits or their identity papers (e.g. identification cards, passports) with their employer or recruitment agency.
- 3.1.9 Where applicable, provide for secure, safe and accessible storage of documents and belongings for the workers.
- 3.1.10 Allow workers to leave their employment freely after reasonable lawful notice.
- 3.1.11 Not restrict its workers' freedom of movement.
- 3.1.12 Not coerce workers to live in employer owned or employer-controlled accommodation facilities and not unreasonably restrict the freedom of movement of workers that are housed voluntarily in employer owned or controlled housing.

3.2 Freedom of association and the right to collective bargaining

Suppliers must:

- 3.2.1 Grant their workers the right to Freedom of Association and Collective Bargaining in accordance with applicable laws and other requirements outlined in ILO Convention No. 87 Freedom of Association and

Protection of the Right to Organise, ILO Convention No. 98 Right to Organise and Collective Bargaining and ILO Convention No. 135 Workers' Representatives. Where the right to freedom of association and collective bargaining is restricted under law, Suppliers should facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

- 3.2.2 Not subject workers to retaliation, intimidation, or disciplinary action because of their efforts to associate or bargain collectively.
- 3.2.3 Inform management and their workers on the workers' rights regarding freedom of association.

3.3 No child labour

Suppliers must:

- 3.3.1 Not use child labour, it is strictly prohibited in line with ILO Convention No. 138 on the Minimum Age, and ILO Convention No. 182 on the Elimination of the Worst Forms of Child Labour. If children are found to be working directly or indirectly for a Supplier, the Supplier must seek a sensitive solution that puts the best interest and welfare of the child first.
- 3.3.2 Comply with the national minimum age for employment or the age of completion of compulsory education and must not employ any person under the age of 15, whichever of these is higher. However, if local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138 on the Minimum Age, this lower age may apply.
- 3.3.3 Protect young workers under 18 years of age (and above the minimum working age) and not employ them to work in conditions which harm their physical, mental and emotional development and wellbeing. This includes but is not limited to suppliers meeting the requirements of ILO Convention No. 90 Night Work of Young Persons (Industry) Convention (Revised).
- 3.3.4 Comply with relevant laws related to young workers.

3.4 Working conditions are safe, healthy and hygienic

Suppliers must:

- 3.4.1 Provide a safe, healthy and hygienic working environment, identify and manage risks adequately, comply with applicable laws and respect requirements in ILO Convention No. 155 on Occupational Health and Safety and ILO Convention No. 187 on a Promotional Framework for Occupational Health and Safety.
- 3.4.2 Provide adequate safeguards against fire (including dormitory accommodation) and have appropriate fire detection and suppression equipment. Maintain relevant inspections and certification requirements.
- 3.4.3 Provide buildings and structures (including dormitory accommodation) that are strong, stable and safe. Maintain relevant inspections and certification requirements.
- 3.4.4 Comply with legal requirements regarding electrical safety.
- 3.4.5 Have adequate number of clearly marked, easily accessible (clear pathways) and unobstructed exits.
- 3.4.6 Provide machinery and equipment that are operationally safe and with adequate safeguards. Keep up to date with maintenance, inspections requirements and any relevant permits or licences for applicable equipment.
- 3.4.7 Keep licences and appropriate training up to date for specialised machinery or equipment operators or maintenance crew where legally required.
- 3.4.8 Identify hazardous materials, chemicals and substances, and handle, move, store, recycle, reuse and dispose of them safely. Applicable laws related to hazardous materials, chemicals and substances must be strictly followed.

- 3.4.9 Have a documented emergency plan including notification and evacuation procedures.
- 3.4.10 Maintain appropriate first aid supplies and training.
- 3.4.11 Provide, free of charge, required personal protective equipment (PPE) to workers and adequately train workers on the relevant risks and the use of PPE.
- 3.4.12 Provide safe drinking water to workers and where appropriate sanitary facilities for food storage.
- 3.4.13 Provide adequate lighting and ventilation.
- 3.4.14 Provide adequate and clean toilet facilities.
- 3.4.15 Provide workers with regular (annual as a minimum) and recorded health and safety training, including emergency drills and evacuation. Such training must be repeated for new or reassigned workers.
- 3.4.16 Conduct (and pay for) relevant occupational health checks for workers, as required by local laws.
- 3.4.17 Assign responsibility for health and safety to a senior management representative.
- 3.4.18 Have adequate health and safety risk identification, risk management and incident management and reporting processes in place.
- 3.4.19 Comply with relevant health and safety legal requirements that are applicable to dormitories.

3.5 Pay fair wages

Suppliers must:

- 3.5.1 Pay wages and benefits for a standard working week that meet or exceed national legal standards. Piece rate payments, where legally acceptable, must be fair and proportionate to the hours worked, and as a minimum meet or exceed legal national standards for the standard working week. In any event, wages for a standard week should always be enough to meet basic needs and to provide some discretionary income for workers and their families (also known as living wages).
- 3.5.2 Provide workers with written and understandable information about their employment condition and wages before they enter employment, and about the particulars of their wages for the pay period concerned each time that they are paid.
- 3.5.3 Not deduct from wages as a disciplinary measure or make any deductions from wages that are not permitted by law.
- 3.5.4 To every extent possible, ensure work is performed on the basis of a recognised employment relationship established through national law and practice.
- 3.5.5 Comply with ILO Convention No. 181 Private Employment Agencies where workers are employed through a third-party labour agency.
- 3.5.6 Pay workers in a timely manner according to relevant laws. Where there is an absence of specific regulatory framework, payments to workers must be made at least within 30 days.
- 3.5.7 Provide workers with and maintain accurate records of payments which include details of days worked, standard hours and rates, any piece rates, overtime hours and associated premiums, any leave hours and associated payments, bonus payments, other benefits etc. and any deductions.

3.6 Working hours are not excessive

Suppliers must:

- 3.6.1 Define working hours by contract and comply with national laws, any collective agreements and the provisions of clause 3.6.2 below, whichever affords greater protection to ensure the health, safety and welfare of workers.
- 3.6.2 Where regular working hours in excess of 48 hours per week is permitted by national law, not exceed a maximum of 48 hours per week on a regular basis. The requirements for regular plus overtime hours in a day, a week, a month etc. must meet legal requirements of the relevant jurisdiction. In any case the sum of regular plus overtime hours must not exceed 60 hours per week.
- 3.6.3 Facilitate overtime that is voluntary, not excessive or demanded, not requested on a regular basis, not used to replace regular employment, always compensated at a premium rate, and fully compliant with national laws.
- 3.6.4 Provide workers with at least 24 consecutive hours of rest for every 7 day period.
- 3.6.5 Comply with applicable laws for workers' entitlements to breaks, rest periods, maternity and paternity leave, sick leave, public and annual holidays.
- 3.6.6 Have adequate, reliable and accurate systems to record working hours, leave and management of pay.

3.7 Treat workers fairly, with dignity and with respect

Suppliers must:

- 3.7.1 Not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on race, ethnicity, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- 3.7.2 Not subject workers to physical abuse or discipline, the threat of physical abuse, sexual or other harassment, verbal abuse, bullying or other forms of intimidation or mental or physical coercion.
- 3.7.3 Document disciplinary measures.
- 3.7.4 Provide equal opportunity for employment.
- 3.7.5 Not make decisions that disadvantage female worker based on their pregnancy status.
- 3.7.6 Protect pregnant workers and not engage them in hazardous work that creates significant risk to them or their unborn child.
- 3.7.7 Respect the rights of vulnerable workers including migrant workers, women, workers with disabilities and those at risk of exploitation.

3.8 Changing factories and sub-contracting

Suppliers must:

- 3.8.1 Provide three months' notice and obtain written approval from the Group prior to changing factories of finished goods, or sub-contracting manufacturing of finished goods.
- 3.8.2 Disclose requested information to the Group including the location and details of all new and sub-contracting factories. These factories will be subject to the same compliance verification as the principal factory.

- 3.8.3 Have policies and processes in place for adequately managing subcontracting, to confirm that sub-contractors operate in accordance with applicable laws, this Code and the Group's Policy.
- 3.8.4 Avoid using homeworkers unless suppliers obtain written approval from the Group and maintain strict compliance with human rights and labour standards requirements of our Policy and this Code.

4. Protection of the Environment

4.1 Environmental permits

Suppliers must:

- 4.1.1 Obtain and maintain currency of all relevant licences, environmental permits and practices for its operations and facilities as required by national and local laws.
- 4.1.2 Comply with the requirements of all its relevant licences, environmental permits and national and local environmental laws.
- 4.1.3 Dispose of their production and hazardous waste (including solid and liquid waste) in accordance with their permits and local environmental laws, as well as industry good practice.

4.2 Environmental management

Suppliers must:

- 4.2.1 Develop, document and implement effective environmental management systems or plans commensurate with their risks.
- 4.2.2 Identify and document through their environmental management system/plan, key environmental impacts (commensurate with the risk) and implement controls to eliminate or reduce impact on the environment, as a minimum, with respect to:
 - waste reduction, reuse, recycle and disposal;
 - chemicals use, storage and management;
 - air emissions;
 - noise;
 - water use and wastewater discharge;
 - climate change, energy use and greenhouse gas emissions; and
 - biodiversity where applicable and a significant risk.
- 4.2.3 When required by the Group, to provide information on energy use and greenhouse gas emission relevant to their operations and supply chains.

5. Beyond Tier 1 Supply Chain and Inputs

5.1 Beyond Tier 1 Factories and inputs

To help meet our due diligence, disclosure and reporting requirements, Suppliers must:

- 5.1.1 Make available (disclose) to the Group information and requested records when required related to beyond tier-1 Factories or suppliers, high-risk products, inputs and raw materials (e.g. cotton, polysilicon, solar panels, high risk minerals, electronics, apparel, footwear etc.);
- 5.1.2 Strictly prohibit the use of forced labour, child labour and any other forms of modern slavery in their respective supply chains and raw material inputs;

In addition, for the Group's own private brand products:

- 5.1.3 Where products containing **cotton**, use responsibly sourced and certified **cotton**. Use of any cotton associated with forced or child labour is strictly prohibited.
- 5.1.4 Where products are predominantly (70% or greater by weight) made from **wood**, use either recycled/reclaimed wood or wood certified under the Forest Stewardship Council (FSC) certification or Programme for Endorsement of Forest Certification (PEFC);
- 5.1.5 For **paper and board packaging** use materials from recycled sources or those certified under the Forest Stewardship Council (FSC) Certification or Programme for Endorsement of Forest Certification (PEFC);
- 5.1.6 For those containing **wool fibre**, use materials certified under a recognised certification scheme (e.g. Responsible Wool Standard) that prohibits mulesing of sheep or other breech modification;
- 5.1.7 For products containing **down and feather** insulation, use down and feathers that are certified to the Responsible Down Standard. The Responsible Down Standard aims to safeguard the welfare of geese and ducks that provide down and feathers.
- 5.1.8 There may be additional requirements, mandates and guidelines issued by the Group or the individual Brands outside of this Code to cover specific needs. Relevant Suppliers must also meet these requirements where applicable.

6 Grievance Mechanisms and Provision of Remedy

6.1 Supplier Grievance Mechanism

Suppliers must:

- 6.1.1 Provide and maintain effective grievance mechanisms that workers and stakeholders in their community can access easily, anonymously, without fear of retaliation, bullying, harassment, intimidation, or discrimination, and in their native language;
- 6.1.2 Train its workers on their rights and entitlements, including how to use the grievance mechanisms provided; and
- 6.1.3 Worker grievances need to be appropriately investigated, necessary remediation addressed in timely manner and workers to be provided with options to escalate if required.
- 6.1.4 Keep records of grievances raised and resolution status including relevant communication between management and the worker.

In addition:

- 6.1.5 The Group or the individual Brands may initiate independent grievance mechanisms, workers voice related surveys or applications. We expect Suppliers to cooperate with reasonable requests to allow workers to participate in relevant processes.

6.2 Provision of Remedy

- 6.2.1 We require our Suppliers to cooperate with the Group and provide effective remediation of human rights and other responsible sourcing issues identified by the Suppliers or via other due diligence processes. For identified human rights issues, we expect an appropriate course of action or remedy aligned with guidance provided in the [United Nations Guiding Principles on Business and Human Rights](#) and relevant Group remediation processes that will support this Code. Suppliers must, cooperate in or provide for the remediation of adverse impacts based on the degree of involvement in causing, contributing to, or being directly linked to the impact. They also need to consider potential impacts from the remediation decisions.

7 Failure to Comply with This Code

We endeavour to work in partnership with our Suppliers. Failure to cooperate and comply with this Code and the [Policy](#) may result in cancellation of orders and/or termination of our relationship with Trade Partners and Service Providers.

Failure to take reasonable steps to comply with the Group Policy or Code may result in disciplinary action for team members of the Group.

8. Confirmation and Verification of Compliance

Suppliers are responsible for compliance with this Code throughout their operations and their entire product and services supply chain. A signed Contract, General Business Agreement or Terms of Trade, acceptance of a purchase order and/or provision of products/services to the Group constitutes confirmation of continuing compliance with this Code.

The Group takes a risk-based approach in determining the method of verification of compliance with our Human Rights and Responsible Sourcing Policy and this Code. Risk assessment for Factories primarily includes consideration of accountability for the product brand and its supply chain, risks associated with the country of supply, product related risk (including potential risk in its supply chains) as well other potential considerations (e.g. risk to migrant workers or other vulnerable workers). We may use external tools or processes to conduct our assessments of risks. Risk assessment for services is based on service category risk and potential impacts. The Group may amend risk assessment variables at its sole discretion based on identified actual or potential risks and impacts.

As part of our due diligence processes, the Group reserves the right to request additional information, relevant records, valid audit reports or conduct its own independent audits to verify compliance with our Human Rights and Responsible Sourcing Policy, this Code and applicable laws. Suppliers must take reasonable measures to assist the Group in providing required information, disclosing significant breaches, conducting audits, allowing site access to the Group's representatives and supplying relevant evidence to verify compliance.

Additional due diligence requirements, remediation requirements, further guidance or clarifications regarding our Human Rights and Responsible Sourcing Policy, this Code or our procedures may be provided by the Group in separate documents to support the implementation of this Code. These will be available via our external website.

We accept audit reports and certificates from several compliance monitoring programs to help reduce audit fatigue in our supply chains. Suppliers who do not have a current and valid audit report will need to arrange an audit with the Group's approved third party audit service provider or via an approved audit scheme and relevant providers.

Independent (third party) Compliance Monitoring programs and Certification Schemes accepted by the Group include:

- [Social Accountability International \(SA8000\) Audit or Certification](#)
- [Worldwide Responsible Apparel Production \(WRAP\) Certification](#)
- [Amfori - Business Social Compliance Initiative \(BSCI\)](#)
- [ICTI Ethical Toy Program Certification](#)
- [Responsible Business Alliance \(RBA\)](#)
- [Fair Labour Association \(FLA\) compliance monitoring reports](#)
- [ILO Better Work Program](#)
- [Social & Labor Convergence Program \(SLCP\) assessment that are verified by approved third-party auditors](#)
- [Sedex Members Ethical Trade Audit \(SMETA\): 2-pillar and 4-pillar audits issued by SAAS accredited certification bodies or Amfori-BSCI authorised audit companies; and](#)
- Audit reports issued by [SAAS accredited](#) or [Amfori-BSCI authorised](#) audit companies that meet the requirements of our Responsible Sourcing Code. Please check with our Responsible Sourcing team by emailing responsiblesourcing@superretailgroup.com.

Conditions of acceptance of audit reports and certificates:

- Certificates must have at least 3 months before expiring. Audits for certification schemes must be conducted by auditors or certification bodies accredited/authorised by the corresponding scheme.
- All audit reports submitted to the Group must note the auditing company name and the auditors' names, include details of non-conformances, any photo files and must not be older than 9 months.

Required audit reports and certificates must be provided to the Group for evaluation and approval by emailing a copy to responsiblesourcing@superretailgroup.com.

Note: For Suppliers that are directly managed by Macpac, audit reports can be sent to the Macpac by emailing a copy to rsc@macpac.co.nz.

Audit reports that contain relevant non-conformances may result in a Corrective Action Plan (CAP) being issued, which details the non-conformances, the desired outcomes and the date by which objective evidence must be provided to the Group demonstrating corrective actions have been completed as required and non-conformances can be closed out.

Appendix 1: International Labour Standards

List of relevant International Labour Standards as defined by the ILO Declaration on Fundamental Principles and Rights at Work and its follow-up recommendations:

- [C87, Freedom of Association and Protection of the Right to Organise Convention, 1948](#)
- [C98, Right to Organise and Collective Bargaining Convention, 1949](#)
- [C29, Forced Labour Convention, 1930](#)
- [C105, Abolition of Forced Labour Convention, 1957](#)
- [C138, Minimum Age Convention, 1973](#)
- [C090, Night Work of Young Persons \(Industry\) Convention \(Revised\), 1948](#)
- [C182, Worst Forms of Child Labour Convention, 1999](#)
- [C181, Private Employment Agencies, 1997](#)
- [C100, Equal Remuneration Convention, 1951](#)
- [C111, Discrimination \(Employment and Occupation\) Convention, 1958](#)
- [The ILO call for Decent Work](#)
- [C1, Hours of Work \(Industry\) Convention, 1919](#)
- [C14, Weekly Rest \(Industry\) Convention, 1921](#)
- [C95, Protection of Wages Convention, 1949](#)
- [C131, Minimum Wage Fixing Convention, 1970](#)
- [C135, Workers' Representatives Convention, 1971](#)
- [C155, Occupational Safety and Health Convention, 1981](#)
- [C161, Occupational Health Services Convention, 1985](#)
- [C187, Promotional Framework for Occupational Safety and Health Convention, 2006](#)
- [R85, Protection of Wages Recommendation, 1949](#)
- [R116, Reduction of Hours of Work Recommendation, 1962](#)
- [R135, Minimum Wage Fixing Recommendation, 1970](#)
- [R164, Occupational Safety and Health Recommendation, 1981](#)
- [R184, Home Work Recommendation, 1996](#)
- [R190, Worst Forms of Child Labour Convention Recommendation, 1999](#)

Appendix 2: Examples of Certification schemes

- Forest Stewardship Council (FSC) offers both forest management and chain of custody (CoC) certification, allowing consumers to identify, purchase and use wood, paper and other forest products produced from well-managed forests and/or recycled materials.
- Programme for the Endorsement of Forest Certification (PEFC) is dedicated to promoting sustainable forest management through promoting good practice in the forest supply chain by ensuring timber and non-timber forest products are produced with respect for the highest ecological, social and ethical standards.
- Responsible Wool Standard (RWS) aims to improve the welfare of sheep and the land they graze on by ensuring the wool does not come from animals that have been subjected to any unnecessary harm, rewarding and influencing the wool industry for strong animal welfare, land management, and social welfare practices and providing a robust chain of custody from farm to final product.
- Responsible Down Standard (RDS) aims to safeguard the welfare of geese and ducks that provide down and feathers, ensuring that ducks and geese are treated humanely and that down and feathers don't come from animals that have been subjected to unnecessary harm.
- Global Recycled Standard (GRS) aims to increase the use of recycled materials in products and reduce or eliminate the harm caused by its production. It is intended for use with any product that contains at least 20% recycled material.
- Recycled Claim Standard (RCS) is an international, voluntary standard that sets requirements for third-party certification of recycled input and chain of custody.
- Better Cotton Initiative (BCI) is a global not-for-profit promoting better standards in cotton farming and practices that improves the lives and livelihoods of the farmers as well as the health of their land.
- Global Organic Textile Standard (GOTS) provides a credible assurance of standards from the harvesting of raw materials, to manufacturing of products and labelling.
- Organic Content Standard is third-party audited from farm to the final product.
- Fairtrade is an ethical label that helps eradicate poverty and inequality around the world, by paying Fairtrade farmers a fair price along with standards of chemical management and supporting farmers to use sustainable land management practices.

Appendix 3: Group relevant policies

[Human Rights and Responsible Sourcing Policy](#)

[Whistleblower Policy](#)

[Code of Conduct](#)

[Compliance Policy](#)

[Anti-corrupt Practices Policy](#)

[Diversity, Equity and Inclusion Policy](#)

Appendix 4: Glossary

Term	Definition
Brand(s)	The four retail Brands of Super Retail Group: Supercheap Auto, rebel, BCF, Macpac.
Child Labour	<p>Child labour refers to work that is mentally, physically, or morally harmful to children; and interferes with their schooling by:</p> <ul style="list-style-type: none"> • depriving them of the opportunity to attend school; • obliging them to leave school prematurely; or • requiring them to attempt to combine school attendance with excessively long and heavy work. <p>Key areas of risk for Super Retail Group are where children are engaged in hazardous work including night work, work with machinery and chemicals.</p>
Corrective Action Plan (CAP)	A plan issued by Super Retail Group setting out non-conformances with our Human Rights and Responsible Sourcing Policy and Responsible Sourcing Code, the date by which evidence must be provided to the Group demonstrating corrective actions have been completed and non-conformances remediated.
Debt Bondage	Payment of excessive recruitment fees or associated costs, and retention of documents.
Deceptive Recruitment	False promise of a job, benefits, or conditions.
Direct Imports	Products we source or import direct from the Factories which manufacture them.
Due Diligence Process	The process by which we evaluate and address risks.
Factories	Focus of our Responsible Sourcing compliance verification program is Factories which supply or manufacture Super Retail Group's: Private Brand Products where the Group owns the Brand or trademark, i.e. products with the Brand's name, trademark or logo on them (including relevant Non-Stock products). It is applicable whether manufacturing is overseas or domestically in Australian or New Zealand; Non-Private Brand Products where the Group directs, arranges or contributes to the manufacturing of the product (including products that only the Group is permitted to make); and Non-Private Brand Products where the Group is the importer of record (also called direct imports).
Forced Labour	Restrictions of movement, intimidation, threats, including human trafficking. It includes situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.
the Group	Super Retail Group Limited.
ILO	International Labour Organisation.
Non-Stock	Non-Stock products include marketing and promotional materials, giveaways, Team Member uniforms etc.
Private Brand	Products manufactured specifically for our Brands, using product brand names owned or licensed by Super Retail Group.

Recruitment Fees	<p>Any fees or related costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection. (ILO).</p> <p>Fees or related costs should not be collected directly or indirectly from the worker, such as through deductions from wages and benefits. All fees and costs must be paid by the employer.</p>
Responsible Sourcing Audit	An audit we may require of a Trade Partner, Factory or Service Provider following consideration of our Due Diligence process.
Responsible Sourcing Code	Sets out specific criteria for our Suppliers to comply with the Human Rights and Responsible Sourcing Policy regarding business integrity; human rights, labour standards and fair working conditions; environmental management; grievance mechanisms; provision of remedy .
Human Rights and Responsible Sourcing Policy	Provides a set of high-level expectations of Team Members, Trade Partners and Service Providers and supply chains in relation to human rights and labour standards, modern slavery, business integrity and the environment, drawing on international standards.
Responsible Sourcing Procedures	Sets out the processes used by Super Retail Group to verify compliance with its Human Rights and Responsible Sourcing Policy and Code.
Responsible Sourcing Team	Team responsible for managing and supporting the delivery of the Group’s Responsible Sourcing Program.
Service Provider	Providers of services to Super Retail Group, such as information technology, cleaning, security services, etc.
Supply Chain	The products and services (including labour) that contribute to our retail and Non-Stock products and services. Includes products and services sourced in Australia or overseas and extending beyond our direct suppliers, including indirect suppliers for raw materials, manufactured componentry and freight.
Team Members	In this Code it includes all team members, officers, volunteers, work experience students, contractors, and labour-hire workers of Super Retail Group and wholly owned subsidiaries (“Group”).
Trade Partners	<ul style="list-style-type: none"> • Suppliers of retail products, including agents and factories which supply or manufacture Super Retail Group’s Private Brand products; • Factories directly contracted by Super Retail Group to manufacture products; and • Suppliers of Non-Stock products to/for Super Retail Group.
Young Workers	Workers under 18 years of age (and above the minimum working age).

Document details

Version	Key changes	Approver	Date
1.0	Version 1	Board of Directors	February 2019
1.2	Minor changes, to accommodate additional audit types		October 2020
2.0	Major revision including template, various clarifications and additions including but not limited to supply chains, vulnerable workers, pregnant women, privacy, remedy, grievance mechanisms, additional disclosures, retaliation, piece rate payments, accurate records, clarification of overtime hours, electrical safety, licences for specialised machinery, occupational health checks, risk and incident management processes, beyond Tier 1 and inputs, compliance and reporting requirements, and specific Macpac related references.	Board of Directors	February 2024

Role	Name	Position title	Date
Author	Shankari Chandran	Head of Sustainability	21 February 2024
Owner	Su Duffey	Chief Operating Officer	21 February 2024
Approver	NA	Board of Directors	21 February 2024