

BLACKMORES SUPPLIER CODE OF CONDUCT

A Blackmores Group Policy

Owner: Chief Operations Officer

Approved by: Blackmores Board of Directors

Prepared by: Ethical Sourcing Manager

Approved date: 22 February 2023

Our Purpose

We exist so you have a choice to make living well each day a natural way of life.

Our Vision

We will connect every person on earth to the healing power of nature.

Our Mission

We combine our knowledge of nature and science to deliver quality solutions to bring wellness to people and their pets everywhere, every day.

1. Overview

This Supplier Code of Conduct is a commitment detailing a shared alignment of values between Blackmores and our suppliers. It sets out the minimum standards of behaviour that Blackmores expects its suppliers to meet in the areas of labour and human rights, health and safety, environment, business integrity, cyber security and privacy, and supplier diversity.

Our business philosophy guides us in our approach to how we work with suppliers. We seek to work with suppliers who have the ability to consistently meet our high-quality standards and specifications and who share our values.

We are committed to sustainability and seek to work with suppliers with a mutual commitment to achieving and maintaining improved environmental and social outcomes.

2. Implementation and expectations of our suppliers

Blackmores believes that sustainability impacts the end-to-end supply chain and that the Supplier Code of Conduct should be considered at all stages of the buying process.

We expect our suppliers to have visibility over their own supply chain and to demonstrate and maintain an accurate and complete chain of custody.

Suppliers are expected to ensure their own suppliers demonstrate a commitment to sustainable business practices and understand their social and environmental impact. We encourage our suppliers to share this Supplier Code of Conduct with any third parties who directly or indirectly are part of our value chain.



Blackmores has a **zero-tolerance policy** towards bribery and corruption and our suppliers must never engage in such practices. This includes a prohibition of the payment of so-called facilitation or facilitating payment. Suppliers can refer to the Anti Bribery and Corruption Policy, located under the Corporate Governance section of our website [here](#).

3. Our Commitment to our Suppliers

We will lead by example in upholding these values and standards. We will strive for shared value and mutual benefits to create enduring working relationships with suppliers where we grow our businesses together.

4. Definitions

In this Supplier Code of Conduct, the following terms have the definitions set out below:

‘Blackmores’ or the **‘Blackmores Group’** means Blackmores Limited and each of its related companies or entities, both current and in the future comprising ‘the Blackmores Group’. Where used in this Supplier Code of Conduct, a reference to ‘Blackmores’ or ‘the Blackmores Group’ may be to all companies or entities in the Blackmores Group or any one or more of the companies or entities as may be applicable in the context.

‘Employee’ or **‘Employees’** means any person employed as a permanent, part-time, casual or contract employee by the supplier, and any person who provides services to the supplier directly as a contractor or consultant or via a third-party entity paid by the supplier.

‘Confidential information’ means all information or data whether written, verbal or electronic including without limitation know-how, compilations, formulae, manufacturing processes, business plans, financial and business strategies and other information and practices, marketing ideas and policies, technical information, new product information, methods of product delivery, test procedures, product samples, specifications, material safety data sheets, scientific, clinical, commercial and other information, data or techniques marked as ‘confidential’ or reasonably considered confidential by the owner of the information.

‘Intellectual Property’ means the intellectual property including without limitation know-how, designs, design concepts associated with packaging and delivery formats, trademarks, patents compilations, formulae, manufacturing processes, business plans, financial and business strategies and other information and practices, marketing ideas and policies, product formulations, technical information, new product information, methods of product delivery, test procedures, product samples, specifications, material safety data sheets, scientific, clinical, commercial and other information, data or techniques, whether or not registered, including all applications and the right to apply for registration.

5. Blackmores Values

Blackmores is its people and the values by which we live. We refer to these values as the Blackmores PIRLS.



6. Healthy People

6.1 Health and safety should be front of mind in all suppliers' working environments. We expect all our suppliers to ensure this is a priority by:

- a) having an effective health and safety management system in operation; which includes compliance with, but not limited to, chain of responsibility obligations:
- b) implementing an effective workplace health and safety policy that is clearly communicated to all staff;
- c) ensure safety incidents and accidents are recorded and appropriately addressed to ensure a safe and healthy workplace. Medical services are available, and first aid kits and first aiders are accessible;

- d) ensuring appropriate actions are taken in relation to those that breach workplace health and safety policies;
- e) providing effective training regarding workplace health and safety to all staff; and
- f) adhering to all relevant workplace health and safety requirements, applicable laws and regulations as amended from time to time.

7. Healthy Planet

As we source ingredients from around the world, we have an opportunity to work collaboratively with suppliers and positively influence change across many regions. Strategic management of our supply chain and its environmental and biological resources has a positive effect on our quality program, helping to manage risks, reduce impacts on natural environments and supporting global communities.

Blackmores requires suppliers involved in producing and bringing to market our products to ensure they have systems in place to demonstrate continuous environmental protection and improvements, including the efficient consumption of raw materials, water, and energy. This could include the protection of biodiversity and management of energy emissions, water and wastewater discharge, noise, waste and hazardous substances supported by clear targets and improvement policies.

7.1 We expect our suppliers to identify and minimise environmental impacts through the following:

- a) implement comprehensive and systematic practices to identify and effectively manage or mitigate all relevant environmental risks within their operational control;
- b) implement an effective environmental or sustainability policy which is regularly communicated to all employees through training;
- c) take active steps to responsibly source finite resources and demonstrate an accurate environmentally and socially responsible chain of custody;
- d) where facilities are managed, demonstrate operations are aligned or accredited to ISO14001 for Environmental Management Systems or another process is in place to identify and manage environmental risks;
- e) maintain and continuously improve an effective program to:
 - I. identify and minimise the supplier's environmental impact, particularly in the areas of water and energy consumption, greenhouse emissions, wastewater discharges, waste generation and recycling;
 - II. measure its carbon footprint, including scope 1, scope 2 and material scope 3 emissions; and
 - III. share such reporting with Blackmores when requested.
- f) Raw Material and Contracted Manufacturers should be aware of, and have measures in place to, minimise or avoid detrimental impacts on nature, natural systems, and biodiversity conservation, and seek to provide credible third party recognised verification of biodiversity or nature protection in their operations and extended supply chain,
- g) suppliers may be asked to provide information on sustainable sourcing practices in their supply chain, including the location of farms and refining operations, to help facilitate Nature Risk Assessments by Blackmores.

- h) packaging Suppliers may be requested to provide Blackmores with environmental information on materials, such as declarations or certifications on processes associated with packaging component sourcing, manufacturing, or finishing. This may include bleaching, etching, additives or contaminants, recycled material composition, post-consumer recyclability and manufacturing greenhouse gas emissions;
- i) Australian Packaging Suppliers should be parties to the Australian Packaging Covenant Organisation; and
- j) waste service providers should have a procedure in place to identify and effectively manage or mitigate all relevant environmental risks within their operational control including for the safe handling, storage, transportation, and disposal of waste in accordance with the applicable legislation. Blackmores will only use appropriately licensed waste contractors.

8. Healthy Communities

8.1 In recognition of human rights, no child exploitation and fair workplace conditions are important in demonstrating respect in the workplace. We expect our suppliers to:

- a) comply with modern slavery risk mitigation actions in line with the Australian Modern Slavery Act 2018 and applicable legislation in other relevant jurisdictions;
- b) ensure business operations are conducted in accordance with the United Nations Universal Declaration of Human Rights;
- c) comply with the Blackmores Group Human Rights Policy by rejecting any form of human rights abuse and prohibiting the use of forced, bonded or child labour in our shared operations and in our shared supply chain;
- d) assess the risks of human rights abuses in the broader supply chain;
- e) take prompt and effective remedial action to address risks of exploitation, eliminate human rights abuses and take prompt action when incidents of abuse have been confirmed;
- f) implement business processes and standards in our control framework that support this Policy including our Grievance Policy, Whistle Blower Policy, Code of Conduct, Supplier Code of Conduct and Supply Agreements, including Terms & Conditions. This includes ensuring that all work is freely chosen and without the use of forced or compulsory labour within our extended workforce and across the supply chain;
- g) maintain a high level of awareness within our extended workforce and provide training and tools as needed to ensure employees have the knowledge and skills needed to uphold related regulatory requirements;
- h) ensure work is voluntary and staff have the right to freedom of association with others and to collective bargaining;
- i) ensure workers are paid fairly receiving, at minimum, a living wage to maintain a standard of living necessary for a worker to meet their basic needs that complies with all applicable laws;
- j) provide good working conditions. Working hours are not excessive, employees are an appropriate age, and adequately trained to perform their tasks. The workplace is safe, hygienic with potable water freely available, sufficient clean toilets, adequate ventilation and lighting, access to medical

assistance, emergency exits, evacuation diagrams posted, and evacuation drills are regularly organised. Employees are provided with appropriate work breaks; and

- k) ensure all workers have access to an internal grievance procedure. The workplace demonstrates a commitment to protecting employees who 'speak up' including effective adherence to statutory requirements for employee protections.

8.2 Community impact is an important consideration when doing business. We encourage our suppliers to:

- a) understand the social impact created by their operations in all locations where they conduct business, having regard to improving levels of unemployment, poverty, community health, and access to education;
- b) understand the social impact created by their suppliers in all locations where their suppliers operate; and
- c) participate in the overall wellbeing of their communities.

9. Business Leadership and Integrity

9.1 Business Continuity Planning is an important tool when defining how our businesses will work together. We expect our suppliers to:

- a) have effective and tested Business Continuity Plans (BCPs) in place with clear escalation procedures outlined and agreed with both Blackmores and a relevant supplier management representative;
- b) protect all information and data received from Blackmores or its customers and their customers in the course of doing business with Blackmores and in accordance with industry recognised good security practises, legislation, regulation and contractual obligations. Such information and data must be kept confidential at all times and not used for any purposes other than the business purpose for which it was provided or made available.
- c) keep information and data confidential and protected from any unauthorised access, destruction, use, modification and disclosure, through appropriate organisational and technical controls
- d) have an effective and tested IT service recovery plan in place with clear escalation procedures outlined with Blackmores and relevant management within the supplier;
- e) strive to be leaders in innovation and work with us to drive our sector forward into the future;
- f) support our commitment to equality and diversity, which may include equal pay for equal work and diversity in leadership;
- g) comply with all applicable laws including but not limited to those relating to anti-discrimination and the prevention of harassment and bullying;
- h) ensure your organisations details remain up to date and accurate on Blackmores' supplier management platform;
- i) maintain effective policies for ensuring compliance with the requirements of this Supplier Code of Conduct and communicate them regularly to staff;
- j) deliver effective training in relation to such matters,

- k) ensure appropriate actions are taken in relation to breaches of this Supplier Code of Conduct; and
- l) if you come across a situation that may be inconsistent with this code, we encourage you to report and seek guidance from your points of contact at Blackmores or refer to Blackmores Speak Up (Whistleblower Protection) Policy located under the Corporate Governance section of our website [here](#). You can make a disclosure via the Disclosure Officers noted in the policy or via Blackmores Speak Up portal, independently managed by Whispli (link provided in the Whistleblower Protection Policy).

10. Ethical Business Practices

10.1 We expect our suppliers to help us achieve our corporate social responsibility goals through the goods and services they supply and to:

- a) abide by the Blackmores Supplier Code of Conduct,
- b) fulfil our commitment to providing safe products of the highest quality to our consumers,
- c) ensure our products meet all applicable consumer protection and other regulatory requirements,
- d) truthfully and accurately enable open communication between us and those who purchase our products,
- e) conduct business honestly and ethically within an established corporate governance framework,
- f) ensure all commercial dealings are conducted in a manner consistent with the best practices of public and commercial business. Accordingly, we expect our suppliers to operate within an appropriate risk, governance and compliance framework which is continuously improved,
- g) have effective policies in place which are regularly communicated to all staff and are aimed at preventing:
 - i. actual or perceived conflicts of interest,
 - ii. bribery and corruption,
 - iii. breaches of competition/trade practices laws; and
 - iv. breaches of any applicable laws not mentioned.
- h) Have a grievance management programme for their employees;
- i) respect and protect the confidential information and intellectual property rights of third parties and Blackmores; and
- j) respect and protect our brand reputation by adhering to all Blackmores' requirements for using our trademarks, images and other Intellectual Property,
- k) obtain prior written approval to use our trademarks and brand images, and before expressing or implying any affiliation to, endorsement of, or sponsorship by Blackmores;
- l) comply with all applicable laws including but not limited to competition/trade practices laws, privacy laws and laws relating to bribery and corruption in all jurisdictions in which the supplier operates, or the goods or services are sold;
- m) engage in open and transparent communications in all dealings;

- n) maintain truthful and accurate accounting and financial records and report results and other material matters in a timely manner in accordance with applicable legislation and other requirements;
- o) act legally and ethically in all transactions; and
- p) consider how their actions would be viewed if scrutinised publicly.

In the spirit of continuous improvement, we welcome our suppliers to share their results and insights regarding best practices in environmental protection and sustainability with Blackmores so we can all work together to mitigate our impact on the planet.

11. Compliance

To measure supplier's compliance to this Code, Blackmores reserves the right to conduct periodic assessments, audits of the supplier's facilities, provided housing, operations, books, records and conduct confidential worker interviews in connection with such audits.

Upon receipt of an unsatisfactory audit result and a supplier's failure to implement required corrective actions, Blackmores in its sole discretion, reserves the right to suspend purchases from the supplier until corrective actions are implemented, or terminate the relationship with the supplier.

Suppliers are responsible for communicating this Supplier Code of Conduct to:

- a) all employees in applicable languages; and
- b) all vendors, subcontractors, and independent contractors in applicable languages.

12. No Waiver

A delay or failure to enforce a provision of this Supplier Code of Conduct does not constitute a waiver of Blackmores' right/s to do so.

13. Document Control

This document may be varied, withdrawn, or replaced by **Blackmores** at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. Refer to the document location in section 15, for the most recent version.

14. Acceptance of this Supplier Code of Conduct

If you are one of our suppliers, please confirm your acceptance of this Supplier Code of Conduct, by arranging for an authorised signatory of your company to sign below.

Authorised Signatory Name: _____

Authorised Signatory Signature: _____

Authorised Signatory Title: _____

Name of Supplier: _____

Date: _____

Suppliers are only required to send back this page. This does not alter your acceptance of this Supplier Code of Conduct.

15. Version Control

Change history and review cycle as of 2021.

Version	Date of change	Reason
1	2021	Review
1.1	February 2023	Cycle review and move to new template
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