

Munro Footwear Group Pty Ltd ("Company")  
ACN 614 250 501

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## Supplier Code of Conduct

## **Munro Footwear Group**

As Australia's largest privately-owned footwear company, the Company and its subsidiary companies are committed to promoting and supporting a culture of corporate compliance and ethical behaviour. In addition to mitigating modern slavery from within its supply chain, MFG also believes it is imperative to consider its environmental impact and social factors in the way it operates. The Company strives to be a good corporate citizen, ensuring its customers can feel comfortable knowing where their footwear originates.

Suppliers are an integral part of the Company's activities. As such, in the selection of its suppliers, the Company works hard to choose reputable partners who share their values, principles and commitments as set out in this Supplier Code of Conduct ("**Code**").

### **Application of this Code**

This Code applies to any entity that supplies goods or services to the Company. It also applies to employees of suppliers and contractors engaged to provide any goods or services to the Company throughout its supply chain, irrespective of the geographical location of the supplier's operations.

### **The Company's Expectations**

The Company expects suppliers to read this Code and declare that they have read this Code.

The Company encourages a culture of openness, collaboration, and discussion with its suppliers. The Company fosters an inclusive culture where everyone feels comfortable speaking up or asking questions without fear of retaliation. If there are any matters outlined in this Code which a supplier or any other third party wishes to discuss, the Company encourages discussion in accordance with the procedures outlined in the paragraph "Contact Procedure" below.

The Company's priority is to always work with its suppliers to develop corrective action plans where possible or necessary. Serious breaches or continued non-compliance or non-disclosure in accordance with this Code may, however, lead to the Company reducing or ceasing to purchase goods or services from such Suppliers.

### **Compliance with Laws**

Suppliers must comply with the law in the countries whereby they operate.

### **Labour and Human Rights**

The Company supports human rights as set out in the Universal Declaration of Human Rights and the ten principles of the UN Global Compact. Further, the Company is a complying entity pursuant to the *Modern Slavery Act 2018* (Cth).

The Company equally requires its suppliers to respect and support the protection of the human rights of workers. Furthermore, the Company expects suppliers to:

- ensure all work is freely chosen without the use of modern slavery, including forced, prison or compulsory labour;
- ensure workers are of legal age, preventing any form of child labour;
- ensure no payment of recruitment fees by workers;
- ensure that no member of the workforce is required to work regular or excessive overtime;
- ensure bullying, harassment, discrimination, physical, sexual, psychological or verbal harassment is not tolerated in their workplace;

- implement and maintain reasonable measures to ensure that their operations and supply chains operate in accordance with the Company's requirements as detailed in this Code or as advised by the Company from time to time;
- provide workers with the option to collectively bargain or to appoint a worker representative;
- pay workers lawful wages, including equal pay for equal work; and
- provide fair working conditions for their employees, including adequate rest periods, sufficient leave, freedom of association and collective bargaining in accordance with local laws.

For the avoidance of doubt, the Company considers that working hours of suppliers, and throughout a supplier's supply chain, should not exceed 60 hours in any 7-day period. Regular working hours should not exceed 48 hours per week and should be clearly set out for all workers.

If suppliers become aware of a labour incident within their business or supply chains, they must disclose it immediately to the Company in accordance with the procedure under the heading "Contact Procedure" below.

*Example*

*Question: I identified that a manager in my factory withholds passports of migrant workers. What should I do?*

*Answer: Having a passport withheld suggests the workers are coerced into working. Forced labour is a basic violation of the human right to freely choose your work. Notification to the Company is required.*

### **Subcontractors**

Suppliers must keep a register of sub-contractors consented to by the Company in accordance with the terms of engagement with the Company. This register must be made available to the Company upon request.

### **Health and Safety**

The Company is committed to providing a safe, healthy, and secure work environment. Suppliers play a significant role in keeping us and each other safe.

Suppliers must provide a safe and healthy workplace and care for their workers and anyone that could be impacted by their activities. Suppliers must:

- take reasonable steps to identify workplace hazards and minimise the risk of workplace injury, illness and disease;
- provide appropriate equipment, resources, instruction, education and training for workers to safely carry out their duties;
- provide personal protective equipment;
- implement effective systems to ensure products and services meet relevant standards and legislative requirements; and
- ensure facilities and amenities for workers (including any accommodation provided) are clean, safe and meet their basic needs.

The following provides further detail of our expectations:

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- support workers to raise health and safety issues or concerns without fear of disciplinary action, dismissal or discrimination;
- prepare for, respond to, manage, and report workplace incidents, injuries or emergencies; and
- have systems, training, and emergency equipment in place to effectively respond to and manage incidents and emergencies.

Suppliers must adhere to the Company's safety requirements across all entities and sites, where applicable.

*Example*

*Question: I was told to complete a maintenance task by the end of the day. I did not have the appropriate personal protective equipment to complete the task. My Line Manager told me to get the job done no matter what. What should I do?*

*Answer: Safety precautions should never be compromised, and you should not start the task until you have the appropriate personal protective equipment. Notification to the Company is required.*

## **Environmental Considerations**

The Company aims to reduce the impact of its operations and acts responsibly in managing the environmental impacts of its operations. As a result, Suppliers are encouraged to look for opportunities to improve environmental outcomes. Options to enhance sustainability include but are not limited to:

- waste minimisation, re-use and recycling;
- reducing and/or offsetting greenhouse gas emissions;
- using solar, wind or other renewable energy where possible;
- reducing the use of energy;
- correct disposal of hazardous and toxic substances (where their usage cannot be avoided); and
- minimising the use of unnecessary packaging.

Suppliers are also expected to:

- minimise the adverse environments impacts of their operations, products and services;
- comply with applicable environmental laws, standards, and notices from regulators; and
- obtain, maintain, keep current and comply with necessary environmental permits, approvals, and registrations.

*Example*

*Question: I noticed that chemicals were not being stored correctly and leaking into the ground. What should I do?*

*Answer: Direct and indirect cumulative environmental impacts and associated risks need to be disclosed to the Company. Notification to the Company is required.*

## Diverse and Equal Opportunity

The Company is committed to being diverse and inclusive and seeks to achieve diversity in its supply chains. The Company expects suppliers to have an inclusive workplace free of discrimination based on gender, age, race, nationality or ethnic origin, disability, family responsibilities, marital status, medical history, political views, pregnancy or potential pregnancy, religious beliefs or activity, sexuality or sexual orientation, union affiliation, physical appearance, social original or carers' responsibilities.

## Business Integrity

The Company pursues the highest standards of conduct and promotes good corporate governance and ethical behaviour. The Company does not receive improper payments, benefits, or gains. Furthermore, suppliers are also expected to act ethically, honestly, and transparently with the Company. Suppliers must:

- avoid actual, potential or perceived conflicts of interest with the Company's employees;
- not operate within regions or provinces that are on an international sanctions list, or operate within or engage with any countries, individuals or business that are subject to international sanctions;
- never engage in bribery or corruption;
- never offer, give or promise anything of value directly or indirectly to a government official to influence official action;
- ensure any gifts and hospitality offered or received are reasonable, appropriate, not overly frequent and for legitimate business purposes only;
- follow relevant competition laws and promote fair behaviour;
- comply with data privacy and regulatory requirements when personal information is collected, stored, processed, transmitted or shared;
- refrain from engaging in any disrespectful, discriminatory or prohibited activity on any form of social media;
- respect the Company's confidential information and not disclose it, except as required by law or where authorised in writing by the Company; and
- ensure the protection of whistleblowers.

### *Example*

*Question: I have seen an invoice from a supplier which includes an amount for "miscellaneous and special fees". I have been told not to question these fees. What should I do?*

*Answer: Suspicious items on invoices suggest the making of improper payments and may be a breach of anti-corruption laws. Notification to the Company is required.*

## Contact Procedure

Notifications, questions or concerns in relation to this Code or any other matter not raised but related to this Code can be made to:

CSR Department	<a href="mailto:CSR@munrofg.com">CSR@munrofg.com</a>
Chief Operating Officer	<a href="mailto:Legal@munrofg.com">Legal@munrofg.com</a>
Your Company representative	

All reports of modern slavery will be investigated. If necessary, the Company may consult with or engage a third party to assist with the investigation.