

Munro Footwear Group Pty Ltd (“MFG”)
ACN 614 250 501

Supplier Code of Conduct

Munro Footwear Group

Munro Footwear Group (“MFG”) are proud custodians of some of Australasia’s most trusted footwear brands. From heritage labels to cutting-edge newcomers, for over 50 years, MFG has been building brands that are relevant today and tomorrow. MFG is committed to driving the sustainable, long-term growth of its national footprint of retail stores, e-commerce sites and wholesale partners. Combining its deep passion for footwear with a culture anchored in seizing opportunities, MFG continually invests in its people, infrastructure, and ways of working in its relentless pursuit of excellence. MFG Suppliers are an integral part of MFGs activities. As such, in the selection of its suppliers, MFG 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 MFG and its subsidiary companies. It also applies to employees of suppliers and contractors engaged in providing any goods or services to MFG throughout its supply chain, irrespective of the geographical location of the supplier’s operations.

This Code sets out the Company’s expectations of its suppliers and applies in addition to the expectations set out in the:

- Modern Slavery Policy
- Gender Equality Policy
- Ethical Sourcing Policy

Expectations

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

MFG encourages a culture of openness, collaboration, and discussion with its suppliers with the intent of fostering 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 that a supplier or any other third party wishes to discuss, the MFG encourages discussion in accordance with the procedures outlined in the paragraph “Contact Procedure” below.

MFG’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 MFG reducing or ceasing to purchase goods or services from such Suppliers.

Compliance with Laws

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

Key terms

There are capitalised key terms contained within this Code which are defined as follows:

- **“Greenhouse Gas Emissions”** means the natural and anthropogenic gases that trap thermal radiation in the earth’s atmosphere as specified from time to time in the Kyoto Protocol, each expressed as a total in units of carbon dioxide equivalent (CO₂e-).
- **“Kyoto Protocol”** means the Kyoto Protocol to the United Nations Framework Convention on Climate Change.

Labour and Human Rights

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

MFG equally requires its suppliers to respect and support the protection of workers' human rights. Furthermore, MFG 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 MFG's requirements as detailed in this Code or as advised by the MFG 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;
- provide fair working conditions for their employees, including adequate rest periods, sufficient leave, freedom of association and collective bargaining in accordance with local laws;
- ensure that there is the right to freedom of movement for all employees to enter and leave employment willingly and voluntarily and ensure that no employee identity documents are withheld from the employees; and
- provide MFG with requisite information and implement initiatives to meet any social targets set by MFG and assist with compliance reporting requirements.

To avoid doubt, MFG considers that the working hours of suppliers 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 MFG 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 tMFG in accordance with the terms of engagement.. This register must be made available to the MFG upon request.

Health and Safety

MFG 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 who 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 details of MFG expectations:

- 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 MFG'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

MFG 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.

MFG may implement environmental targets and initiatives to assist in managing and reducing negative environmental impacts of its operations. Suppliers are expected to assist the MFG in meeting environmental targets and to meet any mandatory reporting requirements. This may include, but is not limited to, the Supplier:

- providing information to MFG relating to the Suppliers:
 - Greenhouse Gas Emissions; and / or
 - energy use, water use, raw material use, chemical use and waste for the purposes of calculating the Supplier's Greenhouse Gas Emissions;
- assisting MFG in obtaining the above information from the Supplier's suppliers; and working with MFG to reduce the Supplier's Greenhouse Gas Emissions.

More broadly, Suppliers are also expected to:

- minimise the adverse environmental 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

MFG is committed to being diverse and inclusive and seeks to achieve diversity in its supply chains. MFG 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.

The Company's expectations for its suppliers relating to gender equality, diversity and equal opportunity are further outlined in the Gender Equality Policy.

Business Integrity

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

- avoid actual, potential or perceived conflicts of interest with MFG'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 businesses 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 MFG's confidential information and not disclose it, except as required by law or where authorised in writing by MFG; 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.

Information requests

MFG may make specific information requests to the Supplier from time to time surrounding the Supplier's business, operations and value chain, including, but not limited to, the following information surrounding the Supplier's:

- internal governance structures, including any relevant policies and procedures;
- Greenhouse Gas Emissions, Greenhouse Gas Emissions reduction targets and broader environmental information;
- supply chain data and due diligence processes; and
- broader environmental, social and governance risks associated with the Supplier.

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:

- your Company representative; or
- to the CSR Department via CSR@munrofg.com, or Chief Operating Officer via Legal@munrofg.com

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