



McPHERSON'S  
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# McPherson's Limited Supplier Code of Conduct

April 2025

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# Supplier Code of Conduct

## 1. POLICY SUMMARY

- (a) This Supplier Code of Conduct (**Code**) outlines the expectations, standards, and ethical requirements that McPherson's has for its suppliers, contractors and third-party partners involved in the supply of goods and services to McPherson's Limited (**McPherson's** or **Company**) (collectively in this Code referred to as **suppliers**). It serves as a foundational tool in responsible supply chain management.
- (b) McPherson's achieves its purpose by aligning our activities to our Statement of Values found [here](#).
- (c) In short, these values include:
  - (i) acting with integrity and respect;
  - (ii) being open and inclusive to all in our community; and
  - (iii) caring for each other, our environment, and our community.

## 2. INTRODUCTION

- (a) At McPherson's, we are committed to operating ethically and responsibly. We expect the same level of integrity and diligence from all our suppliers.
- (b) This Supplier Code of Conduct (**Code**) outlines our expectations regarding ethical behaviour, legal compliance, labour standards, environmental management, and product quality.
- (c) This Code applies to all suppliers of goods and services to McPherson's (and any McPherson's group entities).

## 3. COMPLIANCE WITH CONTRACTS, LAWS AND REGULATIONS

Suppliers must:

- (a) comply with their contractual obligations to McPherson's in all material respects;
- (b) comply with all applicable local, national, and international laws, including those relating to labour, health and safety, the environment, and anti-corruption and anti-bribery;
- (c) maintain all necessary permits and licenses for operations; and
- (d) provide accurate and truthful documentation and records.

## 4. LABOUR AND HUMAN RIGHTS

Suppliers are expected to uphold internationally recognised human rights and labour standards, including:

- (a) **No Forced Labour:** all labour must be voluntary and not forced. Suppliers must not engage in forced, bonded, or indentured labour or involuntary prison labour. Suppliers must comply with applicable modern slavery legislation in the jurisdiction in which they operate;

- (b) **No Child Labour:** suppliers must comply with minimum age requirements as established by applicable laws and not employ individuals under the age of 15;
- (c) **Fair Wages and Working Hours:** employees must be paid at least the legal minimum wage and provided with employment benefits as required by law. Working hours must not exceed the limits set by applicable local laws;
- (d) **Non-Discrimination:** employment decisions must be based on ability and not on personal characteristics or beliefs;
- (e) **Freedom of Association:** workers must have the right to freely join or not join labour unions and engage in collective bargaining;
- (f) **Supporting Women:** support women in leadership and provide a work environment free of any form of discrimination where all employees are treated equally; and
- (g) **Maintain policies to support this Code:** having effective policies to ensure compliance with this supplier code, including training and communications to staff.

## 5. WORKPLACE, HEALTH AND SAFETY

Suppliers must:

- (a) provide a safe and healthy workplace environment that complies with applicable local laws and standards;
- (b) identify and mitigate occupational health and safety risks (and take action when breaches occur);
- (c) ensure that workers are trained in safety practices and have access to adequate protective equipment;
- (d) have an employee grievance procedure in place; and
- (e) establish and implement appropriate and proportionate workplace, health and safety policies, emergency preparedness and response procedures.

## 6. ENVIRONMENTAL RESPONSIBILITY

- (a) Like many organisations, McPherson's sources ingredients and products from all over the world. This reach gives us the ability to innovate and create a better tomorrow through inclusive partnership with our suppliers. Strategic management of our supply chain and the associated environmental resources has a positive effect on the quality of our products, helps manage risks and enables our ability to care for the environment and our communities.
- (b) McPherson's requires its suppliers to ensure they have systems in place to demonstrate continuous environmental improvements, including the efficient use of raw materials and energy emissions, discharges, waste, and hazardous substances supported by clear targets and improvement policies.
- (c) Suppliers are therefore expected to minimise the environmental impact of their operations including, but not limited to:

- (i) complying with all relevant and applicable environmental laws and regulations;
  - (ii) monitoring and managing resource use, waste, emissions, and hazardous materials; and
  - (iii) promoting sustainable practices including energy and water conservation, and recycling.
- (d) We require suppliers to maintain and continuously improve an effective program to:
- (i) identify and minimise the suppliers environmental impact, particularly in the areas of water and energy consumption, waste generation and recycling improvement;
  - (ii) measure its carbon footprint with a minimum requirement of scope 1 and 2 and a preference for relevant Scope 3 emissions;
  - (iii) share such reporting with McPherson's, when requested; and
  - (iv) comply with environmental rules, regulations, and standards applicable to their operations.
- (e) If there is no effective programs capturing the above, implementation of those programs must be commenced within 12 months of becoming a supplier to McPherson's.
- (f) All packaging suppliers to McPherson's should be a party to the Australian Packaging Covenant, if applicable.

## 7. ETHICAL BUSINESS CONDUCT

Suppliers must operate with integrity and transparency by:

- (a) **Honest and Ethical:** conducting business honestly and ethically within an established corporate governance framework and ensure all commercial dealings are conducted in a manner consistent with the best practices of public and commercial business;
- (b) **Safe products and services:** providing safe products and services of the highest quality to our customers and that the products meet all applicable consumer protection and other regulatory requirements;
- (c) **Anti-Corruption and Anti-Bribery:** prohibiting all forms of bribery, corruption, extortion, and embezzlement and implementing policies consistent with these principles;
- (d) **Conflicts of Interest:** avoiding practices that create or appear to create a conflict of interest with McPherson's;
- (e) **Confidentiality:** protecting the confidentiality of information received from McPherson's and other third parties in the course of business;
- (f) **Intellectual Property:** respecting and protecting McPherson's intellectual property rights including use of McPherson's trademarks and brand images;

- (g) **Sources of Raw Materials:** ethically sourcing all raw materials and packaging used in the manufacture of McPherson's products that demonstrate regular analysis and due diligence of suppliers to McPherson's suppliers (including, but not limited to, ensuring all raw materials comply with applicable illegal logging prohibition laws); and
- (h) **Trade Practices and Privacy:** respecting and complying with trade practices, competition, privacy and consumer laws.

## 8. QUALITY ASSURANCE AND PRODUCT SAFETY

Suppliers must:

- (a) ensure that all goods and services supplied meet the quality and safety standards specified by McPherson's and relevant laws and regulations;
- (b) implement effective quality assurance processes and controls; and
- (c) promptly address any non-conformities and work with McPherson's to resolve any quality issues.

## 9. MONITORING AND COMPLIANCE

- (a) We ask our suppliers to share their results and insights as they walk down their own sustainability path.
- (b) The terms of McPherson's agreement with a supplier may give McPherson's the right to conduct periodic assessments or audits of the supplier's facilities, operations and books and records; and
- (c) We may also request to conduct confidential worker interviews in connection with such audits to measure a supplier's compliance to this Code.
- (d) Upon receipt of an unsatisfactory audit result and/or a supplier's failure to implement recommended corrective actions, McPherson's 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 in accordance with the terms of the agreement with the supplier.
- (e) McPherson's therefore reserves the right to:
  - (i) conduct audits and assessments of supplier facilities and practices;
  - (ii) request corrective actions for any violations of this Code; and
  - (iii) terminate the relationship for serious or repeated breaches of this Code.

## 10. ACKNOWLEDGEMENT AND COMMITMENT

- (a) By conducting business with McPherson's, suppliers agree to adhere to this Code and promote these standards within their own supply chains.
- (b) Suppliers are responsible for communicating this Code to:
  - (i) all of the supplier's employees in applicable languages; and

- (ii) all vendors, subcontractors, and independent contractors of the supplier in applicable languages.

**11. REVIEW**

- (a) This Code will be reviewed from time to time by management to ensure that this Code remains relevant and effective.
- (b) This Code may be updated by McPherson's from time to time. McPherson's will work with our suppliers to monitor compliance with this Code. Where issues are identified which do not comply with this Code, McPherson's will work with the supplier to analyse and remedy the situation in the best interest of all parties.

**12. PUBLICATION**

This Code will be published in the Investor Centre / Corporate Governance section of the Company's website [www.mcphersons.com.au](http://www.mcphersons.com.au). A copy will also be made available on request.

**13. DOCUMENT CONTROL**

Version	Description	Date
1	Renewed Document	April 2025

**14. ACKNOWLEDGEMENT**

Suppliers must confirm their understanding of and commitment to this McPherson's Supplier Code of Conduct. By signing and returning this form to McPherson's you acknowledge and accept this commitment.

Name of Supplier \_\_\_\_\_

Representative Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Position / Role: \_\_\_\_\_

Date: \_\_\_\_\_