Jackaroo Supplier Guiding Principles

The values of Jackaroo and its subsidiaries, affiliates, partners, divisions and agents (“Jackaroo”) are founded on the principles of accountability and integrity. Jackaroo expects organizations producing goods and providing services for it, including any approved subcontractors (collectively “Suppliers”), to follow and adhere to these Supplier Guiding Principles in order to do business with Jackaroo. These Supplier Guiding Principles apply to all Suppliers of Jackaroo. The Supplier Guiding Principles represent Jackaroo’s commitment to source goods and services only from Suppliers who strive to comply fully with all applicable laws and regulations, and those who meet internationally recognized standards and practices in dealing with its workers and their working environment.

All Suppliers of Jackaroo must comply with all applicable laws and each of the following principles:

# Labour Standards and Human Rights

* 1. **Prohibition of Forced Labour, Human Trafficking and Slavery:** Supplier may not use any form of forced labour including prison, indentured, bonded, military, slave or any other forms of forced labour; except that, in the event Supplier desires to participate in a program that provides rehabilitation or work programs for incarcerated individuals to supply goods or services to Jackaroo, all elements of any such program must be submitted to Jackaroo for review and written approval by Jackaroo’s Legal Officer or Compliance Officer. Supplier may not participate in the recruitment, transportation, transfer, harbouring or receipt of any persons by means of threat, use of force, or any other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation. Supplier may not require any of its workers to remain in employment against their will.
	2. **Prohibition of Child Labour:** Supplier may not use child labour. Workers should not be younger than the minimum employment age established by the respective country or local jurisdiction. In the event no minimum employment age is established, workers should not be younger than the age of compulsory education; or if no minimum age for compulsory education is established, workers should not be younger than age 16.
	3. **Working Hours:** Supplier’s employee working hours should be in compliance with any and all applicable laws and regulations. However, Supplier is encouraged and should strive to have no employees work more than 60 hours per week, or more than 6 days during any 7 day period.
	4. **Wages and Benefits:** All employees of Supplier should receive at least the legal minimum wage and benefits. A written accounting of wages should be given to the employee during each pay period

***Document dated 1 July 2021***

clearly indicating the employee’s compensation and any deductions. Supplier should pay higher hourly rates for night shifts than for day shifts. Supplier should not deduct penalties from employee wages for disciplinary infractions.

* 1. **Respect for the Individual:** All employees should be treated with respect and dignity.
	2. **Freedom of Association and Collective Bargaining:** Supplier should respect the rights of employees to freely associate, organize and bargain collectively in accordance with the employment laws of its local country. Jackaroo encourages communication and direct involvement of Supplier’s management and employees regarding working conditions without fear of intimidation, harassment or reprisal.
	3. **Non-Discrimination, Harassment and Abuse:** Supplier should make hiring decisions on the basis of the employee’s qualifications to perform the specific job. Supplier should avoid making any decisions relating to hiring, salary, benefits, advancement, discipline, termination or advancement on the basis of the employee or potential employee’s race, colour, gender, nationality, religion, age, maternity, sexual orientation or marital status. Employees shall not be subject to verbal, physical, sexual or psychological abuse or any other form of mental or physical coercion. Supplier should not use physical violence or punishment as a form of discipline.

# Health and Safety

* 1. **Working Environment:** Supplier should maintain a working and housing environment (if Supplier provides housing) that is sanitary, safe, healthy and in compliance with applicable laws and regulations relating to working and living conditions (if applicable). Supplier is required to comply with all applicable laws and regulations pertaining to the local fire code standards and the proper maintenance of all applicable equipment (i.e. alarms, extinguishers, etc.).

**3.0 Environment:** Jackaroo encourages Supplier to be sensitive to its impact on the environment and local communities by enforcing environmental standards within its facilities. This extends to the timely and required maintenance of machinery and transportation fleet (where applicable). As such, Supplier should have an effective, documented environmental policy that complies with applicable environmental laws, rules and regulations.

# Bribery and Corruption

* 1. **Compliance, including but not limited to, matters involving import, export, bribery and corruption concerns**
		1. Supplier represents and warrants to Jackaroo that all Products supplied have been or shall be produced, packaged, labelled, shipped and documented in compliance with all applicable laws of the respective country in which the goods are produced, packaged and shipped, and all other applicable federal, state and local laws, regulations and administrative rules or orders, including but not limited to those involving or enforced by U.S. Customs and Border Protection. Supplier further represents and warrants that it is in compliance with all laws, rules and regulations that are applicable to its relationship with Jackaroo including, but not limited to, U.S. laws regulating prohibition of bribery, anti-terrorism, asset controls and corruption, as well as applicable import or export laws, regulations and administrative rules or orders. Suppliers are required to notify Jackaroo in advance of any conflicts of interest which may impact the Supplier’s ability to meet compliance requirements. This includes any relationships with foreign officials or a non-U.S

government agency. Supplier shall notify Jackaroo immediately in the event of circumstances or changes that would or may affect Supplier’s ability to remain in compliance with Jackaroo’s compliance standards.

* + 1. Conflict of Interest: Suppliers should avoid actions that may result in conflicts of interest, which include offering or providing personal gifts, favors, personal travel expenses, lodging, or other housing, services of any kind, excessive meals and entertainment, or any other thing of value to Jackaroo associates.
	1. **Anti-Corruption:** Supplier must maintain the highest standards of moral and ethical conduct at all times. Supplier shall not engage in any form of corrupt practices including, without limitation to, extortion, fraud, impersonation, false declarations or bribery. Bribes, implied or offered, with the intention of obtaining or retaining a business or other improper advantage are not to be offered or accepted.
	2. **Gifts and Hospitality:** Supplier must adhere to the following Jackaroo policies regarding gifts and hospitality to help alleviate any perception of impropriety:
		1. Jackaroo associates are not to accept gifts of more than $100 USD in value and Supplier may not offer such gifts. There are no exceptions.
		2. Jackaroo associates are not permitted to purchase items directly from Supplier.
		3. Supplier is to immediately report to Jackaroo any inappropriate requests or solicitations made by Jackaroo associates. Suppliers may do so by reporting to Jackaroo’s Management email info@jackaroo-pl.com.au
		4. Suppliers must keep a written account of all payments (including meals, entertainment, gifts or items of value) made on behalf of Jackaroo.

# Management of Standard

* 1. **Inspection Right:** Supplier must be able to demonstrate compliance with these Supplier Guiding Principles to the satisfaction of Jackaroo. Therefore, Supplier will maintain reasonable records and documentation of all matters related to their business with Jackaroo in accordance with standard business practices and/or local laws and regulations. Supplier will permit Jackaroo or parties designated by Jackaroo to inspect (with or without notice) all such records and documentation, and the facilities of Supplier, to independently confirm compliance with these Supplier Guiding Principles.
	2. **Communication:** Supplier agrees to post a copy of these Supplier Guiding Principles in at least two prominent locations where it is likely to be read by employees. This notice must be in English as well as in the local language spoken by a majority of Supplier’s employees.

# Standard Enforcement

* 1. **Violations:** If Jackaroo determines Supplier violated these Supplier Guiding Principles, Jackaroo may demand corrective action or terminate its business relationship with Supplier, notwithstanding anything to the contrary in any other agreement between Supplier and Jackaroo.
	2. **Reporting of Potential Violations:** All Suppliers are expected to adhere to these Supplier Guiding Principles and report any violations to Jackaroo’s Hotline via the local number below or on the web at [www.odhotline.com.](http://www.odhotline.com/) All reports are kept confidential and callers may choose to remain anonymous in their reporting.

# 7.0 Supplier Attestation:

Supplier certifies that neither it nor any of its funding sources, is or has ever been a terrorist or suspected terrorist, or a person or entity described in the aforementioned legislation. Supplier understands that Jackaroo will not do business with a Supplier if the Supplier has ever been a suspected terrorist or associated in any way with terrorist activities.

Supplier also agrees to provide accurate and complete information to Jackaroo to enable it to comply with all of its importation requirements. By way of signature below, the Supplier agrees to have read, understand and agrees to the terms and conditions set forth in the Supplier Guiding Principles and to promptly report any confirmed or suspected violations of these principles to Jackaroo. Supplier further certifies that materials incorporated into the products it supplies to Jackaroo comply with the laws regarding slavery and human trafficking of the country or countries in which it is doing business.