STATEWIDE INDEPENDENT WHOLESALERS LIMITED

Human Rights Policy

Purpose

Human rights are the basic rights and freedoms enjoyed by all human beings without distinction. This policy sets out our commitment to respect human rights of our own team members, workers in our supply chain and other stakeholders. It establishes minimum requirements to be met and underpins our organisational values of 'Think People', 'Think Quality' and 'Think Safety'.

Scope

This policy applies to all Statewide Independent Wholesalers Limited (SIW) team members, contractors and third parties that SIW engages wherever located. We also expect our suppliers and other stakeholders to act in accordance with this policy.

Policy Principles

Our policy is guided by internationally recognised frameworks and instruments. SIW is committed to respecting:

- the rights under the United Nations Guiding Principles on Business and Human Rights (UNGPs);
- each of the eight ILO core conventions as set out in the Declaration on Fundamental Principles and Rights at Work; and
- the International Bill of Human Rights.

The following principles support our commitment to act ethically and with integrity and transparency in all business dealings:

- we respect ethical labour practices and values and promote diversity
- we seek to provide safe, inclusive, respectful, and fair working environments that also support people's wellbeing and are free from discrimination
- we expect our suppliers to respect human rights and we seek to clearly communicate this to them
- we pursue opportunities to support human rights where we can make a positive impact
- we look for opportunities to build the capacity of our own team members, contractors and suppliers on human rights
- we encourage stakeholders to report to us any concerns about human rights relating to the activities of SIW or our suppliers

Policy Requirements

We commit to respecting, and expect our suppliers to commit to respecting, all internationally recognised human rights and to implementing the UNGPs. We commit to, and we expect our supplier's to commit to:

- respecting rights not to be subject to forced labour, child labour or discrimination in respect of employment and occupation
- requiring that pay and benefits are not withheld from workers, and not requiring workers to pay a fee upon commencing employment
- not using deceptive or coercive practices during recruitment or employment, such as making material misrepresentations about the key terms and conditions of employment
- providing a work environment that is safe and hygienic
- complying with applicable local laws, including those regarding working hours and, so that workers are not required to work hours that are unreasonable
- respecting freedom of association and the right to collective bargaining

- not causing or contributing to human rights harm and seeking to prevent and mitigate human rights harm to which we may be directly linked
- implementing policies and processes to support us to identify and prevent or mitigate actual and potential human rights risks
- working to maintain an accessible and effective grievance mechanism to enable the reporting of human rights concerns by relevant stakeholders without retaliation, including our team members, contractors, suppliers and their workers
- recognising our responsibility to provide for, or cooperate in, remediating human rights harm we identify we have caused or contributed to through legitimate processes, in line with the expectations set out in the UNGPs
- ensuring compliance with global standards of human rights and applicable local laws
- communicating this policy and our expectations to our team members, workers within our supply chain and other relevant stakeholders and sharing information with external stakeholders about our human rights performance, including through our annual modern slavery statements

SIW expects its partners and suppliers of goods and services to embed the requirements outlined in this policy in its operations and supply chain.

Breach of Policy

If a team member becomes aware of a potential breach of this policy, they should contact their Team Leader or Manager. A breach of this policy by SIW team members may result in disciplinary action, which will be determined as appropriate to the circumstances of the non-compliance. Deliberate or wilful non-compliance is considered to be particularly serious.

SIW is committed to working collaboratively with suppliers to uplift their capability and find workable solutions to enable compliance with this policy when required. However, if a supplier is unwilling to work with SIW to address issues when complying with this policy and/or fails to show improvement, then SIW reserves the right to review the suitability of its ongoing relationship with that supplier.

Policy Updates

Our policy is approved by the Board and will be cascaded into our established procurement, compliance and risk management frameworks. Periodic reviews will be used to track the effectiveness of this policy. This policy may be changed at any time as circumstances require, however at a minimum it will be reviewed annually. Any material policy changes will be communicated to all relevant stakeholders using appropriate channels.

Related Documents

There are multiple business documents and policies already in operation at SIW which we consider operate in tandem with, or complement, this Policy. These documents and policies include:

- Modern Slavery Statement
- Whistleblower Policy
- Privacy Policy
- Respectful Workplace Policy
- Code of Conduct

Human Rights Policy

Reviewed by:-	Approved by:-	Approval Date
Stuart Robins – Commercial Manager Emma Clements - People, Culture & Safety Manager Paul Connolly - General Manager Hannah Peters - Woolworths Group Human Rights Manager	SIW Board of Directors	20 April 2023

Date Effective: 1 June 2023

Version Control

Version	Date	Change	Author
1.0	20 April 2023	Initial approval	L Willis