

Modern Slavery Code of Conduct

V1 March 2021

Background

This Modern Slavery Code of Conduct (the “Code”) applies to Westgrove’s customers, contractors and suppliers. It sets out the minimum standards that we expect from these entities.

We are committed to the protection of human rights and to fair and ethical work practices. We understand that we have a responsibility to conduct our business ethically and this extends to our customers, contractors and suppliers.

We expect our customers, contractors and suppliers to share our commitment to respecting the rights of all workers and to act lawfully and ethically in all areas of business.

Not only do we ensure that modern slavery is not taking place within our own organisation, we also work to ensure it is not occurring within our supply chains.

It is a condition of all customer, supply and vendor contracts entered into with Westgrove that the principles set out in this Code are adhered to.

Minimum Standards

This Code establishes minimum standards that we expect customers, contractors and suppliers to meet or exceed.

These standards do not intend to deviate from national or local laws or standards.

Failure to meet these standards may be cause for termination of any agreement entered into with Westgrove

Child labour

We are opposed to the use of any form of child labour or practices. Our customers, contractors and suppliers must not use child labour.

Customers, contractors and suppliers are required to comply with applicable laws and employ only workers who meet the applicable minimum legal age requirement in their countries of operation.

Generally:

- the minimum working age is 16 years.
- workers under the age of 18 years are not to be involved in any work that is hazardous or likely to have a negative impact on the employee’s physical or mental development.
- Customers, contractors and suppliers are to ensure the above protection for workers under the age of 18 years.
- Customers, contractors and suppliers must not contract with subcontractors or suppliers who use or engage in child labour.

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Modern Slavery including; forced or involuntary labour & trafficking

Westgrove's customers, contractors and suppliers must not participate, engage or promote forced, bonded, indentured or involuntary prison labour of people in any part of its business.

Westgrove's customers, contractors and suppliers must not participate, engage or promote the trafficking of any person.

All modern slavery and human trafficking laws must be complied with. Customers, contractors and suppliers must ensure they have taken steps to ensure their business operations are free from modern slavery and human trafficking practices, both internally and within their supply chains and other external business relationships.

Customers, contractors and suppliers are to ensure that all workers employed by them choose their employment freely and are not mentally or physically coerced to provide their labour.

Customers, contractors and suppliers must not contract with subcontractors or suppliers using or engaging in modern slavery or trafficking.

Compliance

Customers, contractors and suppliers shall take all reasonable steps to ensure that modern slavery and human trafficking is not taking place within their supply chain or within any part of their business. Customers, contractors and suppliers must adhere to this Code along with all applicable national and local laws.

Customers, contractors and suppliers must be able to certify that materials included in their products comply with all requisite modern slavery and human trafficking laws. Westgrove may at any time request a supplier or contractor to supply a report setting out the steps they have taken to ensure that modern slavery and human trafficking is not taking place within their business or within their supply chain. Westgrove also reserve the right to make unannounced visits to any of our suppliers' premises to conduct an audit on the status of employees, paying particular attention to the employers pay principles.

Customers, contractors and suppliers have a duty to immediately report to Westgrove any breach of or deviation from this Code.

If a customer, contractor or supplier breaches this Code, we reserve the right to request from the supplier or contractor a corrective action plan. This plan is to set out the steps that the supplier or contractor will undertake to rectify the breach. Should the corrective action plan not rectify the breach and depending on the severity of the breach, we reserve the right to terminate any contractual relationship that exists.