

BWX Limited

ACN 163 488 631

SUPPLIER CODE OF CONDUCT

1. Purpose

BWX Limited (ABN 13 163 488 631) and its subsidiary companies (**Company** and, together with its subsidiaries, referred to as **BWX** in this document) is a global natural beauty company. The mission of BWX is to make natural beauty the only choice for people wanting to live a healthy balanced life and we want to use our business to inspire the advancement of plant and mineral based science without causing unnecessary harm to the planet. Having a global supply chain footprint that reflects our values of ethical and sustainable procurement practices while creating a positive, social, economic and environmental impact is critically important. This Supplier Code of Conduct reflects the minimum standards that we expect of our suppliers and vendors to ensure appropriate stewardship of our global supply chain.

2. Scope

All suppliers and vendors of raw materials, packaging and finished goods (**Products**) and other participants in the BWX supply chain including service providers (**Suppliers**) must comply with all parts of this Supplier Code of Conduct as a material term of supply to BWX.

3. Requirements

3.1 Compliance with Laws

Suppliers will comply with all applicable laws, rules, regulations and requirements in the supply of input materials, in the manufacturing and distribution of the Products and the provision of services.

Suppliers must at all times comply with all applicable laws, statutes, regulations and codes relating to antibribery and improper payments including but not limited to the Criminal Code Act 1995 (Cth) (Australia), the Foreign Corrupt Practices Act 1977 (United States), and the Bribery Act 2010 (United Kingdom). Additionally, under the BWX Anti-Bribery and Corruption Policy, BWX employees are strictly forbidden from giving, offering, promising, accept, requesting or authorizing a bribe, whether directly or indirectly. Facilitation payments and political donations are also prohibited and gifts and charitable contributions are regulated to prevent breaches of law.

Suppliers must maintain sufficient financial records and documentation of its workplace practices to comply with all requirements of this Supplier Code of Conduct.

3.2 Labour Standards

Freedom of Employment

Suppliers conduct their operations on basis of a freely agreed and documented terms of employment with its workers. All workers, both permanent and casual, are provided with employment documents that are freely agreed and which respect their legal and contractual rights.

Child Labour

Suppliers will not employ an individual under the local legal minimum age defined by national law or regulation. Where there is no minimum, the convention set by the International Labour Organisation, being 15 years for work and 18 years for hazardous work, will apply. The Supplier will comply with all applicable child labour laws.

Involuntary Labour, Slavery and Human Trafficking

Suppliers will not deprive any worker from their freedom. Suppliers will not condone the use of servitude. Suppliers will not use or condone the use of any forced or involuntary labour, whether prison, bonded, indentured or otherwise. Suppliers will not arrange or facilitate the travel of any person with a view to that person being exploited and will not use or condone the use of any human trafficking.

Coercion and Harassment

Suppliers will comply to all laws on abuse of employees and will not engage in mental or physical abuse of employees.

Freedom of Association and Collective Bargaining

The rights of workers to freedom of association and collective bargaining are recognised and respected by Suppliers. All employees are free to form or join associations/trade unions or refrain from doing so. Workers are not intimidated or harassed in the exercise of their right to join or refrain from joining any organisation.

Employment Conditions

All workers must be paid a total compensation package that includes wages, overtime pay, benefits and paid leave which meets the legal minimum standards of the country of operation by the Supplier. The compensation terms established by legally binding collective bargaining agreements are implemented and followed.

Suppliers must comply to all applicable work hours and overtime laws. Workers are not required to work more than the regular and overtime hours allowed by the law of the country where the workers are employed.

Supplier must comply with relevant Occupational Health & Safety legislation and regulations and Site Rules. The supplier must ensure a safe system of work is followed by the Supplier's employees, agents and subcontractors when supplying the Products; and ensure the Supplier's employees, agents and subcontractors are provided with such information, instruction, training and supervision necessary to enable them to supply the Products in a way that is safe and without risks to health and safety.

All workers are treated with respect and dignity by Suppliers. There is no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination based on race, ethnicity, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social class, union membership or political views is prevented.

Sub-Contracting

Suppliers must not, without written consent, sub-contract the whole of its obligations. In the event that the Supplier uses sub-contracting, the Supplier must confirm that it is satisfied that each sub-contractor has in place a system and work practices to ensure its compliance with applicable laws and this Supplier Code of Conduct.

3.3 Environmental Protection and Sustainable Practices

All Suppliers must possess all permits and licences required to operate the facility where the Products are manufactured or the services provided.

BWV will work with Suppliers to ensure that, in addition to minimum standards around lawful operation, that, to the extent possible, the Supplier engages in good environmental and sustainable practices including:

- Reduction in the overall consumption of water and ensuring the water sources are sustainable;
- Reduction in waste generation;
- Reduction in the use of packaging materials used and focus to use recycled and recyclable packaging, wherever possible;
- Reduction in greenhouse emissions; and
- Protection and conservation of nature and biodiversity.

4. Requirements

BWV will ensure that all Suppliers will undertake self-verification of the BWV Supplier Code of Conduct or their own relevant codes, and will undertake an audit of major suppliers.

To ensure ongoing compliance, BWV may:

- (a) introduce an annual program of recertification and confirmation of the Supplier Code of Conduct
- (b) schedule a program of audits of major suppliers;
- (c) investigate allegations of any breach of the Supplier Code of Conduct by any Suppliers.

For those Suppliers who do not comply or who cease to comply with the provisions of the Supplier

Code of Conduct, depending on the severity and frequency of the non-compliance, BWX will either work with the Supplier to ensure compliance within a reasonable amount of time or will cease to engage with the Supplier.

5. Supplier Acknowledgement

All Suppliers conducting business with BWX shall either sign a letter acknowledging their understanding of these minimum requirements and forming part of the contractual arrangements with Supplier, or shall sign a letter providing a copy of their own relevant codes which at least meet the standards of the Supplier Code of Conduct and confirming compliance with that code.

6. Raising Concerns

Suppliers or any employees, sub-contractors or other associated people with Suppliers, may raise concerns about the Supplier Code of Conduct in two ways:

- (a) By sending a notification to sourcing@bwxltd.com; or
- (b) Via the BWX Whistleblower Policy (see www.bxtltd.com for details).

7. Review and communication

BWX plans to communicate with all existing suppliers on timelines for acknowledgement of Supplier Code of Conduct by the end of 2020.

The content of this Policy may change from time to time as approved by the Board.

The policy is available on BWX's website <http://bwxltd.com/suppliers/>

8. Adopted and Approved

This Policy was approved by the Board on 20 February 2020.

Supplier Confirmation

Group Procurement Director
BWV Limited
2 Darby Way
Dandenong South, VIC 3175
Australia

Dear Sir

BWV Supplier Code of Conduct

We, the undersigned, acknowledge and accept the BWV Supplier Code of Conduct.

In connection with the BWV Supplier Code of Conduct, we confirm that:

- (a) The content of the BWV Supplier Code of Conduct has been reviewed by our executive management;
- (b) In relation to our operation, we comply with all elements of the BWV Supplier Code of Conduct;
- (c) We confirm that the BWV Supplier Code of Conduct is binding on us as a material term of our agreement with BWV Limited;
- (d) To the extent that we appoint subcontractors, we confirm that we are satisfied that the subcontractors are complying with the BWV Supplier Code of Conduct; and
- (e) We will immediately inform BWV Limited if we cease to be compliant with any element of the BWV Supplier Code of Conduct.

Yours faithfully

Signature of Authorised Signatory

Signed for and on behalf of: _____

Date: