# Ethical Sourcing Definition & Policy

LOVRETA ESTATE

*Lovreta Estate has committed this business to trade ethically and responsibly. We will be respectful of Human Rights in our dealings with all people.*

*We will at all times exceed the requirements of the Ethical Trade Initiative and all statutory legal obligations in respect of employment, ethical conduct, safety and health and environmental care.*

## 1. General Business Conduct and Integrity

*Compliance and Professionalism*

1.1 We will demonstrate a high degree of professionalism and have a close affinity with the business ethics of our key customers.

1.2 We will deal fairly and ethically with all shareholders, workers, customers, suppliers and other stakeholders.

1.3 Honesty, fair dealing and the proper treatment of workers shall be the required basis of all of our activities.

1.4 We will not engage in misleading advertising and we will disclose all material facts which are appropriate to conducting business honestly and ethically.

1.5 We will disclose all potential conflicts of interest to those persons or parties involved in the specific transaction.

1.6 We will treat personal information in confidence and in compliance with the provisions of the Privacy Act 1988 as amended.

1.7 All of our business activities shall comply with all relevant Australian laws including the requirements of the Trades Practices Act 1974 as amended.

1.8 The business shall maintain insurance policies in respect of premises, contents, public liability and employee indemnity for realistic insured amounts and policy inclusions.

*Criminal Behaviour*

1.9 Bribes, favours, benefits or other similar unlawful or improper payments of any kind or otherwise are strictly prohibited.

1.10 No documents or records shall be falsified for any purpose.

1.11 Adulteration, counterfeiting, mislabelling, substitution, addition, tampering, diluting or misrepresentation of food, ingredients or packaging; or false or misleading statements made about food are not permitted at any time.

1.12 All suspected fraudulent or criminal activity will be reported to the Police and /or other relevant enforcement agencies.

*Suppliers*

1.13 There shall be no sub-contracting of labour unless previously agreed with our key customers.

1.14 All labour sub-contracting and home working shall be managed to ensure that sub-contractors do not abuse, exploit or provide unsafe working conditions for their employees.

1.15 All sub-contractors, and suppliers providing materials or labour in the production or manufacture of fresh produce items which we sell shall comply with these Ethical System Policies.

**2. Human Rights and Labour Resources**

*Recruitment and Hiring*

2.1 All employment must always be on the basis that it has been freely offered to and entered into by the applicant.

2.2 No forced labour, bonded or involuntary prison labour shall be used.

2.3 Only workers with a legal right to work shall be offered employment or engaged for work of any kind.

2.4 All workers, including staff provided by an employment agency, shall be validated for their legal right to work by reviewing original documentation prior to any offer of employment being made.

2.5 Employment agencies engaged in recruiting activities shall be required to adhere to all of our policies in relation to Labour Resources.

2.6 Labour providers will not be used unless under contracted arrangements which meet all customer requirements and workers are afforded the same rights and privileges as all other workers in relation to minimum employment standards and as set out in these Ethical System Policies.

2.7 No worker shall be required to lodge any deposit or their identity papers.

2.8 We fully support ILO Convention 138 with regard to the appropriate age of workers and will not work with suppliers who use child labour.

2.9 We will not engage or employ any child or person who is younger than the legal age for completing compulsory education in Australia other than as provided for by sub-policy

2.10 We support the development of legitimate apprenticeship programs for the education and benefit of young people under the age of 15 years, provided the child is not being exploited or given jobs that are dangerous to their health and safety.

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*Freedom of Association / Unions*

2.11 Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively.

2.12 We have an open attitude towards the activities of trade unions and their organizational activities.

2.13 Workers representatives shall not be discriminated against and must be provided with access to carry out their representative functions in the workplace.

2.14 Where the right to freedom of association and collective bargaining is restricted under Law, we will facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

*Remuneration*

2.15 As a minimum, wages and benefits paid to workers for a standard working week shall meet the Federal Minimum Wage as determined by The Australian Fair Pay Commission; or industry benchmark standards, whichever is higher.

2.16 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time they are paid.

2.17 We will not make deductions from wages as a disciplinary measure nor for any other purpose which is not provided for by law without the express permission of the worker concerned.

*Working Hours*

2.18 Working hours shall comply with prevailing laws and benchmark industry standards, whichever affords greater protection.

2.19 Workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7-day period on average.

2.20 Overtime shall be voluntary, shall not be excessive, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

*Conditions of Employment*

2.21 All work shall be performed on the basis of recognised employment relationship established through Australian national laws and practice.

2.22 The provisions and entitlements set out in the National Employment Standards of Fair Work Australia shall apply to each and every employee.

2.23 Disciplinary measures may include up to three written warnings to workers who have been disciplined about their activity or behaviour. Immediate termination of employment may result from misconduct, dishonesty, criminal activity if the worker has previously received three written warnings. All disciplinary measures shall be recorded.

2.24 All workers free to leave the premises once their shift ends, or to leave employment after providing reasonable notice.

2.25 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour only contracting, sub-contracting, or home working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed term contracts of employment.

*No Discrimination or Harassment*

2.26 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based upon race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

2.27 All conditions of employment shall be based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion or personal beliefs.

2.28 All employees will be afforded the full protection available to them under federal legislation including the – Australian Human Rights Commission Act 1986; Racial Discrimination Act 1975; Sex Discrimination Act 1984; Disability Discrimination Act 1992; and Age Discrimination Act 2004.

2.29 We shall provide an environment where employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.

2.30 Workers shall be treated with dignity and respect. Physical abuse, the threat of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation are strictly prohibited.

2.31 Employees have the right to raise grievances in strict confidence and without fear or reprisal. All such grievances will be addressed directly with the person(s) concerned and records kept about the nature of the grievance and remedial action taken.

**3. Safety and Health**

3.1 Workers will be provided with a safe and clean working environment in which they are not exposed to any hazards in accordance with our obligations under the Occupational Safety and Health Act 1984 of Western Australia as amended.

3.2 We will provide workers with plant and systems of work that are safe and without risks to health.

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3.3 Every effort must be made to prevent accidents and injury to health in the working environment include appropriate safety instruction and warning signs.

3.4 A number of unlocked, freely accessible and clearly marked exits for emergency evacuations will be provided.

3.5 Properly maintained fire extinguishers of an appropriate type shall be available for use.

3.6 Electrical safety standards shall be maintained on-site including installation of residual current devices for all power outlets and annual electrical safety checks of all operational equipment by a qualified electrician. Fixed office electrical equipment to be checked every 5 years.

3.7 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.8 Workers shall be appropriately supervised and trained to perform their jobs safely.

3.9 A Safety Committee comprising worker and management representatives shall meet regularly to review all site safety. Minutes from meetings to be recorded.

3.10 A senior management representative will be responsible for health and safety.

3.11 Personal protective safety equipment will be provided to workers who shall be trained in its use.

3.12 Safeguards on machinery shall be fitted and maintained in compliance with local laws.

3.13 Large knives shall be stored safely and used only with appropriate protective gloves.

3.14 First aid kits shall be available and maintained to a standard of emergency preparedness at all times.

3.15 Appropriate numbers of personnel shall be appointed as first aiders and receive training in first aid treatment and emergency response.

3.16 Clean toilet facilities and clean drinkable water is to be available to all personnel on site. Water sample to be regularly tested to ensure it meets Australian Drinking Water Guidelines for potable water.

3.17 Sanitary facilities for temporary food storage shall be available for workers.

3.18 Accommodation, where provided, shall be clean, safe and meet the basic needs of workers.

3.19 Material Safety Data Sheets shall be available for all chemicals used in the workplace.

3.20 Site maps showing emergency evacuation points and procedures shall be displayed prominently and provided to all personnel.

3.21 Records shall be kept for all workplace related accidents, illnesses or injuries.

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**4. Environmental Care**

4.1 All national and local environmental laws and regulations shall be fully complied with.

4.2 We shall strive to comply with relevant international environment protection standards.

4.3 All production waste shall be disposed of in accordance with local environmental laws and regulations.

4.4 Key environmental impacts shall be identified and documented.

4.5 Controls shall be implemented to minimise the impact on the environment with respect to solid waste disposal, hazardous chemicals storage and management, air and water emissions.

**5. Ethical System Review**

5.1 An annual review of all business systems and activities to verify continuing compliance with these Ethical System Policies and demonstrated commitment to continuous improvement shall be undertaken yearly.