[AUSTRALIAN EATWELL PTY LTD]

HUMAN RIGHTS POLICY STATEMENT

Aligned to the SEDEX (SMETA) Four-Pillar Standard and the Core Conventions of the International Labour Organization (ILO)

Document Owner	Office Manager	**Approved By**	Managing Director
Approval Date	20.10.2026	**Next Review**	Annually, or sooner if legislation changes

1. Statement of Commitment

Australian Eatwell Pty Ltd is committed to conducting its business in a manner that respects the human rights and dignity of all people. This Policy applies to all directors, officers, employees, workers and agency labour across all sites and operations, and sets out the minimum standards we expect of our own operations and of our supply chain.

This Policy is grounded in internationally recognised standards, including the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the core Conventions of the International Labour Organization (ILO), the ETI (Ethical Trading Initiative) Base Code, and the SEDEX Members Ethical Trade Audit (SMETA) methodology. Where national law and these standards differ, we apply whichever affords the greater protection to workers.

2. Approval and Governance

This Policy has been reviewed and formally approved at the most senior level of the organisation by the Managing Director confirming his full endorsement and accountability for its implementation. Signed approval is recorded on page 4 of this document and is retained on file as evidence for social compliance audits, including SMETA.

Ultimate accountability for this Policy sits with the MD. Day-to-day ownership and implementation is delegated as follows:

Role	Responsibility
Managing Director	Approves the Policy, allocates resource, and reviews performance annually.
Office Manager	Owns the Policy, oversees training and communication, monitors compliance and audit readiness.
Supervisors	Implement the Policy day-to-day, ensure local practice complies with this Policy and applicable law.
All Personnel	Comply with the Policy, complete required training, and report concerns without fear of reprisal.
Procurement / Buying Teams	Cascade this Policy to suppliers and other business partners and verify adherence.

3. Policy Principles

The following principles reflect the ILO core Conventions and the SMETA / ETI Base Code Four-Pillar approach (Labour Standards, Health & Safety, Business Ethics, and Environment). They represent the minimum standard to be met in every part of our operations and supply chain.

Freely Chosen Employment No forced, bonded, indentured or trafficked labour. Employment is voluntary and workers are free to leave with reasonable notice. No worker is required to lodge deposits, identity documents or passports as a condition of employment.	**Freedom of Association & Collective Bargaining** Workers, without distinction, have the right to join or form a trade union of their choice and to bargain collectively. Worker representatives are not discriminated against and have access to carry out their representative functions.
Safe & Hygienic Working Conditions A safe and hygienic working environment is provided, taking account of the prevailing knowledge of the industry and specific hazards. Adequate steps are taken to prevent accidents and injury, and workers receive regular and recorded health and safety training.	**No Child Labour** No child labour is used. Adequate remediation support is provided in the exceptional case a child is found to be working. Young workers under 18 are not exposed to hazardous conditions or night work.
Living Wages Wages and benefits paid for a standard working week meet at minimum national legal standards and are always sufficient to meet basic needs, providing some discretionary income. All workers are provided written and understandable information about employment conditions before entering employment and about wage particulars each pay period.	**Working Hours** Working hours comply with national laws and industry benchmark standards, whichever affords greater protection. Working hours, excluding overtime, are defined by contract and overtime is voluntary, does not exceed legal limits, and is compensated at a premium rate.
No Discrimination No discrimination is practised in hiring, compensation, training, promotion, termination or retirement on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.	**Regular Employment** Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship are not avoided through the use of labour-only contracting, sub-contracting or home-working arrangements, or through apprenticeship schemes with no intent of imparting skills.
No Harsh or Inhumane Treatment Physical abuse, disciplinary deductions from wages, mental or physical coercion, bullying, harassment and verbal abuse are prohibited, as are threats of any such treatment. This includes gender-based violence and harassment (GBVH), including sexual harassment, in line with ILO Convention 190. Detailed definitions, reporting channels, investigation procedures and support measures are set out in our Policy on the Prohibition of Harsh or Inhumane Treatment, Gender-Based Violence and Harassment.	**Business Ethics** Business is conducted with honesty and integrity, including a zero-tolerance approach to bribery and corruption, and appropriate protection for whistleblowers who raise concerns in good faith.
Environmental Responsibility Operations are managed to minimise adverse environmental impact and to comply with applicable environmental laws and regulations.	

4. Communication of this Policy

To ensure this Policy is understood and applied consistently, it is communicated as follows:

4.1 Internal Personnel

- Displayed in local languages on notice boards and in common areas at all sites.
- Issued to every new starter as part of induction and referenced in the employee handbook and contract of employment.
- Published on the company intranet, and, where used, worker-facing apps or noticeboards accessible to all shifts.
- Reinforced through toolbox talks, worker committees and worker forums.

4.2 External Parties

- Published on the company website.
- Referenced in supplier codes of conduct, purchase order terms and contracts with agents, labour providers and subcontractors (if applicable).
- Shared with customers, investors and other stakeholders on request, and made available to SMETA / SEDEX auditors and third-party verification bodies.
- Communicated to labour providers, recruitment agencies and business partners, who are required to cascade equivalent standards to their own workforce and sub-suppliers.

5. Training

Relevant personnel are trained on this Policy to ensure it is understood and consistently applied:

- All new employees and workers receive human rights and Policy training as part of induction, before starting work.
- Managers, supervisors, and recruitment personnel receive more detailed annual training covering forced labour indicators, freedom of association, working hours, wages, and grievance handling.
- Refresher training is delivered at least annually and whenever the Policy is materially updated.
- Training completion is recorded, and understanding is checked (for example through worker interviews, toolbox talks or short assessments), providing evidence for internal audit and SMETA verification.
- Worker representatives and grievance committee members receive specific training on their role, confidentiality and non-retaliation.

6. Grievance Mechanism

A confidential and accessible grievance mechanism is available to all workers and external parties to raise concerns about human rights impacts without fear of retaliation, dismissal or disciplinary action. Grievances may be raised through line management, worker committees, Staff Feedback Form, a suggestion box, or directly to office Manager / Managing Director. All grievances are logged, investigated and closed out within a defined timescale, with outcomes fed back to the individual where appropriate.

For concerns of gender-based violence and harassment specifically, workers may also raise a concern through the channels set out in our Policy on the Prohibition of Harsh or Inhumane Treatment, Gender-Based Violence and Harassment, which sets out a survivor-centred, confidential investigation and support process aligned to ILO Convention 190.

7. Monitoring, Audit and Review

Compliance with this Policy is monitored through internal audits, management review, worker interviews and third-party ethical audits, including SMETA. Non-conformances are recorded in a corrective action plan (CAPR) with defined owners and timescales. This Policy is formally reviewed at least annually, or sooner where there is a change in law, SEDEX / SMETA requirements, or ILO guidance, or following a significant audit finding.

8. Approval

This Human Rights Policy Statement has been reviewed and approved at the most senior level of Australian Eatwell Pty Ltd.

Nathan Harris *Nathan Harris*	29/10/2026
Name & Signature — Managing Director	**Date**

[AUSTRALIAN EATWELL PTY LTD]

HUMAN RIGHTS POLICY — SUMMARY

One-page overview, aligned to SEDEX (SMETA) and ILO core standards

Australian Eatwell Pty Ltd is committed to respecting human rights across our own operations and supply chain. This commitment is set out in full in our Human Rights Policy Statement, approved by the CEO/Managing Director and Board. Below is a quick-reference summary for everyday use.

What We Commit To

- Freely chosen employment — no forced, bonded or trafficked labour; no confiscated ID/deposits.
- Freedom of association — workers may join a union and bargain collectively without discrimination.
- Safe & hygienic workplace — hazards controlled, accidents prevented, H&S training given.
- No child labour — under-18s never in hazardous work or night shifts.
- Living wages — pay meets legal minimums and covers basic needs, with clear wage slips.
- Working hours — legal limits respected; overtime voluntary, limited and paid at a premium.
- No discrimination — in hiring, pay, promotion or termination, on any protected ground.
- Regular employment — no misuse of sub-contracting or false apprenticeships to avoid obligations.
- No harsh treatment — no physical/verbal abuse, harassment, bullying or unlawful deductions.
- Business ethics — zero tolerance of bribery/corruption; whistleblowers protected.
- Environmental responsibility — operations comply with environmental law and minimise impact.

How This Is Put into Practice

- Communicated to all staff at induction, on noticeboards, and via the intranet; shared with suppliers, agents and customers through contracts and onboarding.
- Trained: induction training for all new starters; deeper annual training for managers, HR and recruitment staff; refreshed at least yearly.
- Enforced: monitored through internal checks, worker interviews and independent SMETA audits, with corrective actions tracked to closure.
- Backed by a confidential grievance channel — workers can raise concerns with no fear of retaliation.

Who Owns This

Approved by: [Managing Director] | Policy owner: [Office Manager] | Next review: [Annually]

Full Policy & Questions

The full Human Rights Policy Statement is available on [www.australianeatwell.com.au]. Questions or concerns can be raised with info@australianeatwell.com.au or via the grievance mechanism described in the full Policy.