

BLUNDSTONE AUSTRALIA PTY LTD

CODE OF CONDUCT

We are committed to ensuring that every step we take is better than the last.

The Blundstone Code of Conduct (BCC) is a step forward in the way we do business. It sets out our minimum standards and expectations that we and our value chain partners are working to meet. We seek to work with businesses that respect our Code of Conduct and will partner with us to ensure the welfare of employees, the responsible and efficient use of resources and the minimisation of our footprint on the planet.

We also acknowledge that value chain assessment, compliance and improvement is an evolving and ongoing process, and in response we continue to increase our resourcing and investment in these activities.

We use a risk-based approach to determine our highest priorities for auditing and visitations.

We choose not to do business with suppliers in countries that we do not believe support our minimum standards.

Our major value chain partners include Blundstone footwear manufacturers, leather suppliers and Blundstone distributors.

1. People

Ethical Business Practices

We act ethically in our business transactions and expect the same from our suppliers and distributors. We have zero tolerance for corruption or bribery, extortion, and embezzlement, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law.

Child Labour

We do not accept child labour practices anywhere throughout our supplier or distribution network. All children have the right to a childhood and that it is our duty to protect them from being forced to work or have their freedom violated. Our suppliers must abide by all child labour laws in their country of operation. If a supplier does not accept or abide by our Code of Conduct on child labour, we will not continue working with this supplier.

Fair Employment

All workers are entitled to a fair and safe workplace. We have no tolerance for forced or compulsory labour or any other type of labour that would be considered illegal. We do aim to educate and improve fair employment in all workplaces, if required we seek to initially facilitate appropriate standards prior to termination of partnerships. We do not work with any suppliers who force employees to hand over their identification to secure employment, or suppliers who request financial deposits from employees to secure their position.

Employee Disciplinary Practices

No workers should be subject to physical, sexual, psychological or verbal harassment or abuse and under no circumstance do we accept that corporal punishment or other forms of mental or physical disciplinary actions are undertaken. We do not tolerate income deductions as a form of disciplinary practice.

Anti-Discrimination

No worker should be discriminated on the basis of race, national origin, ethnicity, political opinion, social group, religion, age, sexual orientation, gender, marital status, health, disability or other classes protected by law. All our suppliers must employ personnel based on skills and experience, and not on any other grounds.

We require fair treatment of pregnant workers and new mothers. All our footwear assembly factories provide paid maternity leave for their employees.

Freedom to Get a Fair Deal

We believe in workers' right to freedom of association and bargaining. All workers should be free to and have the right to bargain. Employees who are part of a union or employee associations should feel safe and free to be a part of these organisations.

Employee Agreements, Remuneration and Working Hours

All employees will have clear, legitimate and valid agreements of employment. The employment agreement should include complete and understandable summary of the terms and conditions of employment, including wages, benefits and working conditions.

All employees must be fairly remunerated for the work that they do, all employees must be paid at least the legal minimum wage as determined in the country of operation. These wages should be paid on time, and records kept ensuring that employees are correctly remunerated for the hours they work.

Working hours are compliant with national laws and regulations. Time off for employees is in accordance with the applicable laws and regulations. Workers should not have to work unreasonably excessive hours.

Safe and Comfortable Working Conditions

All employees have the right to be safe in their place of employment. All employers must ensure regular building checks and maintenance are performed. All employees should be aware of emergency exits (clearly marked), first aid equipment and what to do in the case of an emergency.

The well-being of workers within all workplaces is critical, minimum standards in relation to cleanliness and hazards must be met. The factory should have good ventilation, workstations are lit appropriately, sanitary facilities should be clean and workers have access to these facilities without restrictions.

2. Planet

Compliance

Our suppliers must comply with all applicable environmental laws and regulations in the country of operation. We will only do business with suppliers in countries that we believe are sufficiently active in monitoring and improving environmental impact and practices.

We encourage all our suppliers to examine and set strategies around the areas of:

- **Waste management;**
- **Energy consumption;**
- **Water usage and handling; and**
- **Emissions**

3. Product

Animal Welfare

At Blundstone, we believe that animals should never be subjected to harsh or cruel treatment. Taking the lives of animals must at all times be conducted using the quickest and least painful and non-traumatic methods as possible.

With the majority of our footwear and ancillaries made from leather, we pay particular attention to the countries and sources our leather comes from.

Recycled and Recyclable

We actively work with our partners to maximise the use of recycled and recyclable content where possible. This currently includes specifically our packaging and the production of our gumboot products.

Innovation

We strive to design products that are tough and durable, designed to last. We will consistently review our existing products to understand how materials can be maximised and production impacts minimised. When creating new products, we will seek to utilize new sustainable technologies and processes where fit for purpose. We encourage all suppliers and partners to invest in innovation and sustainable advancements in production.