

Brambles

Human Rights Policy

Brambles Limited

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Version 4.0

HUMAN RIGHTS POLICY

Respect For Human Rights

As set out in Brambles' Code of Conduct, respect for human rights is fundamental to Brambles and its Group Companies and to the communities in which we operate. This is embodied in our regenerative model, which facilitates the "share and reuse" of the world's largest pool of reusable pallets and containers while working to create a nature positive economy that delivers a safer, more efficient supply chain for the future. In pursuing this model, we have adopted a wide range of standalone policies, practices and programmes across a number of areas that are important to human rights, including, safety, labour rights, diversity, equity, inclusion and privacy.

Brambles' Human Rights Policy is guided by the Code of Conduct, which, in turn, is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. As a demonstration of our commitment to these principles, Brambles is a signatory to the United National Global Compact ("UNGC") and continues to support the UNGC's Ten Principles in the areas of human rights, labour, environment, and anti-corruption.

In Brambles and across our Group, we are committed to ensuring that people are treated fairly with dignity and respect and to engaging with our local community stakeholders—including those from indigenous or other at risk populations—to ensure that we are listening to, learning from, and taking into account their views and respecting their respective cultures, heritages, and traditional rights as we conduct our business. We will endeavor to work cooperatively with governments and civil society organisations to make progress in addressing issues and better understanding how we can make a difference.

Our Commitment

We are committed to respecting all internationally recognised human rights relevant to our operations. Where national law and relevant international human rights differ, we seek to follow the higher standard. Where national law and relevant human rights standards conflict (meaning that Brambles would be in breach of national law if we were to adhere to the conflicting international human rights standard), we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible.

Scope of this Policy

This Human Rights Policy applies to all directors, officers and employees of Brambles and each of its Group Companies. All are expected to comply with this policy and conduct their activities on behalf of Brambles accordingly. Brambles and its Group Companies also are committed to working with joint venturers, suppliers and other third parties who uphold the principles in this Policy or who adopt similar policies within their own businesses.

Valuing Diversity, Equity and Inclusion

Brambles values the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to fair treatment and equal opportunity and have no tolerance for discrimination or harassment of any kind. We are dedicated to maintaining workplaces that are free from discrimination or harassment on the basis of race, sex, colour, nationality or national origin, class, religion, age, disability, marital status, sexual orientation or gender identification, political opinion, or any other status protected by applicable law.

In every country and culture, Brambles aims to be an employer of choice. We recruit, hire, place, train, compensate, and advance the best people for the job on the basis of merit and job-related competencies—without discrimination.

Brambles believes in equal pay for equal work, and our approach to compensation is grounded in principles of fairness and equity for all employees. At Brambles, employees in the same or similarly-situated jobs should be paid fairly and equitably for their work.

Regardless of personal characteristics or status, Brambles does not tolerate disrespectful or inappropriate

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behaviour, unfair treatment or retaliation of any kind in the workplace and in any work-related circumstance outside the workplace. Brambles' commitment to these values is set out in its Diversity Policy.

Forced Labour and Human Trafficking

As set out in the Code of Conduct, Brambles prohibits—in its own operations and those of its suppliers—the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour, and any form of human trafficking.

Brambles recognises that one of the most vulnerable groups can be migrant workers who have travelled within country or from overseas to obtain employment. To offer the greatest protection to this class of workers, Brambles ensures that: (1) migrant workers have exactly the same entitlements as local employees; (2) any commissions and other fees associated with employment of migrant workers must be covered by the company, not the migrant workers; and (3) migrant workers are not required to turnover their identification documents, except as is briefly necessary to verify identity and employment eligibility.

Child Labour

Brambles will not tolerate child labour in its own operations and those of its suppliers.

We believe that **all** labour is harmful, exploitative or destructive if it begins at too early an age. As a result, we do not employ children—and we do not do business with suppliers or other third parties who employ children—under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is higher. In addition, we will not employ any child under the age of 18 years if they may be engaged in work which could be categorized as hazardous, and we will not tolerate suppliers or third parties who do so. Brambles considers hazardous child labour to be any work likely to jeopardise the health, safety or morals of the child or compromise their education and include, without limitation:

- Work that requires the use of power-driven machinery or equipment;
- Work at dangerous heights or in confined spaces;
- Work which exposes children to hazardous substances, agents or processes or to temperatures, noise levels or vibrations damaging to their health; or
- Work under particularly difficult conditions such as work for long hours or during the night or work where the child is unreasonable confined to the workplace.

Indigenous Peoples

We respect the rights of indigenous peoples where they are affected by our business.

Work Hours, Wages and Benefits

Brambles recognizes that wages are essential to achieving an adequate standard of living. We operate in full compliance with all applicable wage, work hours, overtime and benefits laws, and we recognise that everyone has the right to rest and leisure, including the reasonable limitation of working hours and periodic holidays with pay. Additionally, Brambles aims to do business with suppliers and other third parties who comply with applicable wage, work hours, overtime and benefits laws and who agree to ensure transparency, to remedy any shortcomings identified and to drive continuous improvement.

Safe and Healthy Workplace

Brambles strives to provide a safe and healthy workplace for all its employees and complies with applicable safety and health laws, regulations and internal requirements. For more information on this topic, please consult Brambles' Zero Harm Charter and the Health and Safety Policy set out in the Code of Conduct, as well as local business health and safety policies.

Further, Brambles is committed to maintaining a workplace that is free from violence, intimidation and other unsafe or disruptive conditions due to internal or external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity.

Freedom of Association and Collective Bargaining

As set out in the Code of Conduct, Brambles respects our employees' right to join, form, or not to join a labour union without fear of reprisal, retribution, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. Brambles is committed to bargaining in good faith with such representatives.

Privacy

We are committed to complying with all applicable privacy laws and regulations. Our Global Privacy Policy sets the framework Brambles follows to meet this commitment.

Our Communities

We respect the human rights of the peoples of the communities in which we operate and recognize that we must be responsible for using resources wisely. That is why we are pioneering a regenerative supply chain, where we help to create a nature-positive economy with re-use, resilience and regeneration at its core, for the long-term benefit of society. Brambles actively encourages our employees' efforts to make a difference in their local communities.

Our Supply Chain, Due Diligence and Remediation

Through ongoing, risk-based due diligence, appropriate contractual provisions and our Supplier Policy, which is aligned with the expectations and commitments set out in this Human Rights Policy, we make our suppliers and other third parties aware of and expect their compliance with our human rights commitments, amongst others. Suppliers and other third parties are asked to acknowledge the requirements set out in this Policy and our Supplier Policy and to have established similar practices which respect and uphold these commitments.

We recognize that, in certain countries where we operate, there are particularly high, systemic risks of human rights abuses. To mitigate against these risks, we put in place additional due diligence and implement tighter controls as appropriate. Our highest risk supplier categories are also audited and monitored.

Speak Up and Remediation

Remedy is an integral part of our human rights programme, and at Brambles we are committed to providing effective grievance mechanisms and access to remedy in situations where we may have caused, contributed to or otherwise been directly linked with an adverse human rights or environmental impact. We will not knowingly condone or contribute to adverse human rights impacts caused by the actions of our suppliers or other third parties. If we become aware of an adverse impact, we will engage to be part of the solution, seeking to prevent or mitigate the adverse impact, and where circumstances require (e.g., the nature of the impact or the supplier's unwillingness to work with us), we will terminate the relationship.

Transparency is part of Brambles' culture and we have adopted a comprehensive approach to creating grievance channels. We continue to build awareness and knowledge of our employees on human rights and encourage them to Speak Up, using available grievance mechanisms, including our Speak Up hotline, about any concerns they may have without fear of retaliation, retribution or victimisation. We investigate, and where appropriate, take remedial action to address concerns, including suspected human rights concerns.

Additionally, we encourage our suppliers to make available effective grievance to their employees, and we make our Speak Up hotline available to them and our extended supply chain.

Compliance with this Policy

All employees must take the time to read and understand this Human Rights Policy. Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment.

Responsibility For The Success Of This Policy

The Brambles' Board has overall responsibility for this Policy. The Chief Compliance Officer has day-to-day operational responsibility for this Policy and should ensure that all employees receive regular and appropriate training.

The Chief Compliance Officer, in conjunction with the Board, will review this policy and our due diligence

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programme to assess effectiveness and incorporate lessons learned. Findings will be reported to the Brambles' Board. This Policy does not form a party of any employee's contract, or otherwise create one, and it may be amended from time to time. Employees are invited to comment on this Policy and suggest ways in which it might be improved. Comments or suggestions should be addressed to the Chief Compliance Officer.

Reporting Concerns or Wrongdoing under Brambles' Speak Up Policy

Brambles creates workplaces in which open and honest communications among all employees are valued and respected. If you have any questions about this Human Rights Policy, or if you would like to report a potential violation of it, please speak to your line manager, your local Human Resources Representative, or any member of the Legal or Executive Teams. Where permitted by local law, you also may report suspected violations of this Policy through the Brambles Speak Up Hotline by visiting the website at www.brambles.ethicspoint.com or by calling the appropriate telephone number for your location, which can be found on the Speak Up posters located throughout your workplace.

Consistent with Brambles' Speak Up Policy, no reprisal or retribution will be taken against any employee for raising concerns under this Human Rights Policy. Brambles is committed to investigating, addressing, and responding to the concerns of employees and to taking appropriate corrective action in response to any violation.