

Brambles' Supplier Code of Conduct

Upholding Standards of Integrity, Responsibility, and Sustainable Partnership

1. Introduction

Brambles is a company built on the values of integrity, respect for people, and dedication to responsible and sustainable business practices. These principles, to which we have committed worldwide, are set out in our Brambles Code of Conduct, which is available in 19 different languages on our [Brambles website](#).

As a business that is fundamentally rooted in strong values, we believe our relationships with suppliers are a direct extension of our commitment to the Brambles Code. This Supplier Code of Conduct establishes the minimum standards we expect from all our suppliers, contractors, subcontractors, (each a "Supplier") and their employees, agents, and representatives when conducting business and helps reinforce our implementation of the Brambles Code. It is each Supplier's responsibility to educate its subcontractors, employees, agents, and representatives accordingly.

By providing (and continuing to provide) goods and services to Brambles and CHEP, the Supplier commits that all existing and future agreements and business relationships with Brambles will be subject to the following provisions. Any reference to Brambles includes CHEP and any of Brambles' Group Companies.

2. Business Integrity

The Supplier must operate in compliance with all applicable local, national, and international laws and regulations and conduct their business in an ethical manner. This includes, but is not limited to, abiding by all laws relating to anti-bribery and anti-corruption, money laundering, labour and employment, human rights, data privacy, environmental protection, competition, trade, and health and safety. The Supplier is responsible for keeping abreast of, and ensuring that its business practices conform to, all legal requirements relevant to its operations.

2.1 Anti-Corruption and Bribery

In all its activities, the Supplier must never, directly or indirectly through their agents or intermediaries, offer, promise, authorise, solicit, or provide any financial or other advantage to any government official or any private individual or entity for the purpose of influencing an act or decision, securing an improper advantage, or inducing the misuse of an official or professional position. Nor must the Supplier accept any advantage in return for any form of preferential treatment from a third party.

2.2 Permits and Reporting

The Supplier must obtain, maintain, and keep current all required operating licenses, permits, and registrations, including not limited to all required environmental licenses, permits, and registrations. It must comply with all applicable operational and reporting requirements mandated by law or by Brambles.

2.3 Fair Competition

The Supplier must act with integrity in all business relationships and conduct its business in accordance with fair competition and antitrust laws.

2.4 Sanctions and Export Controls

The Supplier must comply with all applicable sanctions, embargoes, and export control laws and regulations. The Supplier is prohibited from engaging in any transaction or business relationship that would violate such laws, including dealings with individuals, entities, or countries subject to international sanctions or trade restrictions.

The Supplier must ensure that its products, product components, services, technology, and financial transactions do not directly or indirectly involve, or come from, sanctioned parties or prohibited destinations.

The Supplier is expected to review country of origin and conduct appropriate screening and due diligence to identify and prevent violations of sanctions and export controls.

3. Health and Safety

The Supplier must provide a safe and healthy working environment for all workers. At a minimum, this includes free and safe water, sanitation, hygiene, fire exits and essential safety equipment, and access to first-aid supplies and emergency medical care or local healthcare facilities. The same applies to housing, when provided.

3.1 Occupational Safety

The Supplier must identify, assess, and effectively prevent work-related accidents, injuries, and illnesses and minimise or eliminate, to the extent reasonably practicable, the causes of hazards in the workplace environment. Where hazards remain, emergency and contingency plans for addressing residual risks must be established and regularly tested through drills or other appropriate means.

3.2 Product Quality and Safety

All products and services delivered by the Supplier must meet the quality and safety standards required by applicable law. When doing business with Brambles, the Supplier must comply with Brambles' specified quality requirements, as agreed in the Supplier's contract with Brambles.

4. Sustainability and Environmental Responsibility

Brambles promotes circular economy practices and responsible sourcing of raw materials, including sustainable forestry and conflict-free materials. With this in mind, we encourage all Suppliers to strive for minimal and efficient use of natural resources, energy, and water, and to seek to reduce waste, emissions, and pollution. Further, we encourage Suppliers to prioritise those waste disposal solutions that are environmentally responsible and that recover resources for alternative uses.

Suppliers should work to continuously improve the efficiency and sustainability of their operations and to minimise, halt and reverse their impact on nature and the environment (including, but not limited to, water, air, ecosystems, biodiversity, and natural resources).

5. Labour and Human Rights Standards

Respect for human rights is fundamental to Brambles and to the communities in which we operate. With this in mind, we are committed to, and require the Supplier to commit to, respecting all internationally recognised human rights relevant to our operations, including freedom of association and the right to collective bargaining, equal remuneration for work of equal value, a healthy and safe workplace, and the rights not to be subject to forced labor, child labour or discrimination in respect of employment and occupation.

5.1 Freely Chosen Employment

All employment must be voluntary. The Supplier must not use forced, bonded, or involuntary labor, including human trafficking or slavery in any form.

5.2 Child Labour

The Supplier must not employ workers under the age of 15, or under the local age for completing compulsory education, whichever is higher. The Supplier must strictly prohibit the worst forms of child labour, as defined by ILO Convention 182, including slavery, trafficking, forced labour, commercial sexual exploitation of children, the use of children in illegal activities, or work that is likely to harm the health, safety, or morals of children. The Supplier must implement appropriate age-verification procedures and maintain reliable records to confirm workers meet minimum age requirements. Where young workers are employed consistent with local law and this Section 5.2, the Supplier must ensure that their work does not interfere with their education and that they are not exposed to hazardous or unsafe conditions.

5.3 Freedom of Mobility

Workers must have freedom of movement and must not be confined to the workplace premises, including any provided housing. Moreover, no worker should pay any commission or other fee (including recruiting fees) associated with their employment. Finally, the retention of workers' personal documents (such as passports, identity cards, birth certificates, work or residence permits, or other travel documents) is prohibited. Where presentation of these documents is required by law to verify identity and employment eligibility, they must be returned as soon as possible to the worker.

5.4 Non-Discrimination and Equal Opportunity

The Supplier must provide equal opportunity in all aspects of employment and must not engage in unlawful discrimination or harassment on the basis of race, colour, national origin, religion, age, disability, gender, sexual orientation, marital status, or any other protected characteristic. Employment decisions must be based on merit, relevant qualifications, and business needs, and the Supplier is expected to promote an inclusive workplace and provide reasonable accommodations for individuals with protected characteristics (including disabilities) in accordance with applicable laws and regulations. Workers must be protected from victimisation and retaliation.

5.5 Respect at Work and Humane Treatment

The Supplier must treat all workers with dignity and respect. No worker shall be subject to any form of psychological abuse, intimidation, harassment, or threat of violence, and there must be no harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, or physical coercion.

5.6 Wages and Benefits

Wages and benefits must meet at least the legal or industry minimum standards or, where applicable, the requirements set out in collective bargaining agreements, whichever is higher. Wages should be sufficient to afford a decent standard of living for workers and their families. Other than legally mandated deductions, deductions should not be disciplinary and should be made only with the written consent of workers in a language they understand. Wages must be paid on time, regularly, and in full, and the Supplier is required to provide workers with clear, itemised payslips at the time of wage payment in a language that workers understand.

Further, the Supplier is expected to ensure that all statutory benefits, any required pension contributions, tax obligations, and severance payments are made in full compliance with applicable laws and regulations.

5.7 Working Hours

Working hours, including overtime, must comply with applicable laws and industry standards. Total weekly working hours may not exceed local legal requirements or 60 hours, whichever is stricter, unless each of the following circumstances apply:

- It is allowed by local legislation;
- It is allowed by a collective bargaining agreement, where applicable;
- Appropriate safeguards are taken to protect workers' health and safety; and
- The Supplier can demonstrate that exceptional circumstances apply, such as unexpected peaks in production or repair, accidents, or emergencies.

All overtime must be voluntary and compensated, at a minimum, in accordance with local law. Workers must receive at least twenty-four consecutive hours of rest in every seven-day period, and they are entitled to take legally required annual leave.

6. Indigenous Peoples and Local Communities

The Supplier must respect the rights, dignity and cultural heritage of Indigenous Peoples and local communities affected by their operations and value chains. To this end, the Supplier must engage in meaningful consultation and obtain free, prior and informed consent where their activities may impact Indigenous lands, resources or cultural heritage. It must also ensure that its operations do not contribute to the displacement, exploitation or marginalisation of local communities and that benefits are shared in a fair, transparent and equitable manner.

7. Confidentiality and Data Protection

To the extent applicable to the services or goods they provide, the Supplier must responsibly manage, protect, and secure personal and confidential information of our company, our workers, and our customers, in accordance with applicable laws, including applicable data protection laws, Brambles' security policies, and industry best practices. This means that, where applicable, the Supplier must maintain effective cybersecurity controls, limiting access to authorised personnel only, and preventing unauthorised access, loss, disclosure, or misuse. The Supplier must immediately notify Brambles of any actual or suspected cyber incident or data breach involving Brambles' information, take immediate steps to contain and remediate the issue, and cooperate fully with any related investigation or response.

The Supplier must also ensure that any Artificial Intelligence ("AI") systems or automated-decision-making tools used in connection with Brambles' businesses are developed, deployed and managed in a responsible and ethical manner. This includes compliance with applicable laws and emerging regulations on AI, transparency regarding the use of automated systems, protection of human rights and personal data, and the implementation of safeguards to avoid bias, discrimination or other harmful impacts. The Supplier is expected to maintain appropriate human oversight of AI systems, ensure accountability for outcomes, and promote the safe, fair, and explainable use of AI throughout its operations and value chains.

8. Reporting Concerns

If the Supplier has concerns that any activity carried out for or on behalf of Brambles has deviated from the principles or requirements set out in this Supplier Code of Conduct or violated an applicable law, rule, or regulation, the Supplier must promptly report it to [Brambles' Speak Up hotline](#).

9. Audits and Assessments

Brambles reserves the right to assess a Supplier's compliance with this Code of Conduct through audits, site visits, and self-assessments. The Supplier is expected to cooperate fully and promptly with all compliance verification activities. In the event we become aware of any actions or conditions that do not comply with this Supplier Code of Conduct, we reserve the right to demand prompt corrective measures or, where no corrective measures are reasonably available or implemented in a timely fashion, to terminate the engagement.