

Purpose

Hellers is a leading meat and poultry value added manufacturer across Australia and New Zealand, producing a range of meat, fish and poultry products which are sold to retail, foodservice, industrial, and quick service restaurants.

Hellers is committed to operating sustainably and ethically, including in our procurement decisions. Our suppliers play a role in helping us to deliver positive outcomes for our customers, shareholders, employees, communities, and the environment.

Our Supplier Code of Conduct is a statement of the standards we expect our suppliers to achieve or work towards. The principles and standards outlined here are aligned to relevant international standards of practice. By setting high standards and adopting a partnership approach, our aim is to drive improved sustainability outcomes in our supply chain.

Scope

This Code applies to all suppliers (“Suppliers”) engaged by Hellers. For the purposes of this code “Suppliers” includes any third-party organisation which provides goods or services to Hellers (Suppliers), including their employees, representatives and subcontractors. This Code also applies to all Suppliers’ parent companies, affiliates and subsidiaries.

Hellers expects Suppliers to seek to adhere to the principles set out in this Code and will adopt a partnership approach to support suppliers to meet the standards. From time to time, Hellers may request a program of action to meet the principles outlined in the Code from Suppliers.

Hellers will incorporate the principles in this Code into contracts for supply.

Our Expectation

Hellers expects all Suppliers to:

- Demonstrate good corporate governance
- Conduct business, lawfully, ethically and with integrity
- Protect the environment
- Provide safe and high-quality food products
- Provide safe and healthy working conditions
- Adhere to the Five Freedoms Animal Welfare framework and move towards meeting the Five Domains Animal Welfare framework.
- Adhere to sustainable sourcing with regards to Soy, Palm (Kernal) Oil, Fish and Paper, Pulp and Timber.
- Adhere to the ILO Declaration on Fundamental Principles and Rights at Work and ETI Base Code and avoid the use of modern slavery.
- Foster a diverse, equitable and inclusive workplace
- Support local communities

Approach

Our intention is to work with our Suppliers in a constructive way to lift the bar for how business is conducted with respect to human rights, the environment, animal welfare, sustainable sourcing and ethics.

To meet our expected standards of ethical and sustainable business, Hellers expects its Suppliers to:

- Adhere to the standards set out in this Code as minimum standards of practice. Where multiple standards apply, including via contractual terms, the stricter requirement is to be applied.
- Set similar standards for your own suppliers including sub-contractors
- Develop and document appropriate management systems to support compliance with this Code.
- Maintain appropriate records and valid documentation, especially with regard to worker visa rights, wages, pay slips and working hours.

- Respond to reasonable requests for information from Hellers' including, but not limited to provision of policies and procedures, completion of self-assessment questionnaires, and participation in site visits, or
- Undertaking a third-party verification audit as reasonably requested.
- Report breaches of the Code to Hellers.

Hellers will make every effort to work together with our Suppliers as partners to implement these standards and continuously improve supply chain sustainability and quality of life of the workers within it. Hellers endeavours to give preference to suppliers who align with our values and commitments.

Hellers will verify the compliance with the standard set out in this Code through its Supplier Assessment Questionnaire (SAQ) process.

If Suppliers consider that they cannot comply with this Code, they should communicate with Hellers regarding challenges faced by their business in implementation of the standards. Hellers will work in with suppliers to find pragmatic solutions. Where appropriate standards cannot be attained or in case of a substantial breach, with no evidence of meaningful action or improvement, Hellers may undertake remedial action including termination of the business relationship as a last resort.

If there are any questions about our approach or the standards in this Code, please reach out to us at esg@hellers.co.nz.

Principles and Standards

Good corporate governance

We expect our suppliers to:

- Operate ethically, and conduct business with integrity and in accordance with all applicable laws, regulations and ethical standards
- Not engage in any form of corruption, including bribery, extortion, money laundering, unlawful or improper payments (in cash or in kind) or other illegal, unethical or anti-competitive dealings
- Be honest, fair and transparent in dealings, and accurate with financial and business records
- Disclose and manage any actual, perceived or potential conflicts of interest.
- Meet taxation obligations.
- Pay subcontractors promptly.
- Protect sensitive, privileged and confidential information and intellectual property of Hellers'.
- Safeguard employees, contractors and customers' personal information and data, and comply with all relevant national privacy laws.
- Actively manage cyber security and data risks.

Refer to Hellers Code of Conduct Policy for further details.

Protecting the Environment & Climate Action

Environmental impact management

We encourage our Suppliers to:

- Protect the environment in which they operate by adopting sustainable environmental management practices and minimising the environmental impact of activities.
- Investigate and mitigate any risks or harmful impacts to nature and biodiversity such as soil, water and air pollution, habitat destruction, excessive levels of water consumption, deforestation, depopulation of species and illegal logging, posed by their operations, business activities and products
- Take active steps to responsibly source finite resources, environmentally responsible products and adopt environmentally responsible service providers where reasonable.
- Make staff aware of environmental responsibilities.

- Establish and implement documented environmental policies.

Emissions reductions

We encourage our Suppliers to:

- Address climate change by identifying and implementing activities that support the transition to net zero, including by considering opportunities to implement energy efficiency measures and transition to renewable energy alternatives.
- Communicate with employees on their sustainability activities and priorities.
- Take reasonable steps to understand their own greenhouse gas emissions and reduce these in line with the Paris Agreement targets.

Waste & Circularity

We encourage our Suppliers to:

- Limit or reduce the volume of waste produced.
- Consider opportunities to reduce, minimise or eliminate the use of hazardous substances or materials in activities that may damage the environment.
- Separate and appropriately dispose of hazardous materials and chemicals and ensure waste does not leak into the environment or otherwise pollute it.
- Redesign products to use less packaging or replace packaging with sustainable, biodegradable, or recycled alternatives.
- Dispose of waste responsibly, including recycling where appropriate.

Refer to Hellers Corporate Social Responsibility and Responsible Sourcing Policies for further details.

Modern Slavery and Decent Work

Labour Rights

We expect our Suppliers to:

- Not use of any form of slavery, servitude, indentured, bonded, involuntary, prison, military, compulsory labour or any form of human trafficking
- Take steps to ensure that workers are employed voluntarily and without threat of penalty or sanctions.
- Allow workers to cease providing their labour and services after providing reasonable notice.
- Conduct appropriate due diligence regarding labour standards and worker protections, notably when engaging a recruitment agency or labour broker. Take reasonable steps to protect migrant workers from labour exploitation; verify that all workers have legal rights to work and ensure they receive full legal entitlements.
- Establish documentation checking systems and implement reasonable controls in operations and supply chain to monitor for modern slavery practices.
- Not retain workers' identity papers
- Not restrict workers' freedom of movement.

Child labour

We expect our Suppliers to:

- Establish age-verification mechanisms to ensure only workers who meet applicable minimum age and eligibility requirements in the relevant jurisdiction are employed in operations and supply chain.¹
- Demonstrate that the employment of young workers does not compromise their health, safety, or moral integrity, or harm their physical, mental or emotional development.

¹ Where local laws do not specify minimum ages of employment, or where this is in conflict with the Convention on the Rights of the Child and ILO Child Labour Convention, the supplier must not engage in child labour. This means that children under the age of 15 are not to be engaged in work, and children between the ages of 15 and 18 must not do hazardous or dangerous work. In countries where the local minimum age is 14 in accordance with the ILO convention 138, the younger age shall apply. Where children under the age of 18 are legally employed, their work must not interfere with their schooling, social, emotional, or physical development and they must be provided with appropriate safety protections.

Freedom of association

We encourage our Suppliers to:

- Respect the right to freedom of association and collective bargaining and support worker representation groups wherever possible.
- Encourage open communication between workers and management to resolve workplace issues without fear of reprisal, intimidation or harassment.
- Regularly and proactively engage with workers.

Working Hours & Wages

We expect our Suppliers to:

- Comply with all national working hour laws and standards.
- Allow overtime work to be voluntary, not excessive² and paid at premium rate, in line with legal requirements or as otherwise agreed.
- Protect workers' rights to refuse assigned overtime work without fear of retaliation, punishment, or disciplinary actions.
- Provide workers with appropriate rest, no less than 1 day per 6 consecutive workdays, and allow workers to take sick leave and annual leave in accordance with local laws.
- Pay wages and benefits, including superannuation, leave entitlements, public holidays, and compensation insurance that minimally meet or exceed national legal requirements and not make unauthorised deductions.
- Pay workers in a timely manner and give them wage slips or equivalent details for the pay period each time they are paid.
- Periodically assess wages.
- Provide workers with contracts with clear terms and conditions of employment including hours and wages.

Refer to Hellers Modern Slavery Policy for further details.

Respectful and Inclusive Workplace

We expect our Suppliers to:

- Foster a safe, diverse and inclusive workforce free from discrimination, harassment, and all forms of violence, intimidation and humiliation.
- Treat all employees fairly and not allow discrimination on any basis in hiring and employment practices.
- Establish processes to support the disclosure and management of bullying and harassment practices
- Identify and take active steps to improve opportunities to improve equality in the workplace.
- Consider setting active commitments to enhance diversity, equity and inclusion in their workplaces.

Refer to Hellers Diversity, Inclusion and EEO Policy for further details.

Healthy and safe workplace

We expect our Suppliers to:

- Take all reasonable measures to provide a safe, healthy workplace for their employees and contractors.
- Comply with all applicable local workplace health and safety laws
- Maintain documented health and safety policies and procedures in place to support worker physical and mental health and safety.

²Overtime hours should not exceed the relevant national legal limits, or 12 hours per week as specified in the ILO standard and Ethical Trading Initiative Base Code, whichever is stricter.

- Make available for workers all necessary, and appropriate personal protective equipment and provide adequate training.
- Ensure safeguards on machinery meet or exceed local laws, document standard operating procedures, and only permit trained people to operate machinery and equipment.
- Assign a senior management representative to be responsible for health and safety

Refer to Hellers Health & Safety Policy for further details.

Food safety, quality and authenticity

We require our meat, ingredient and packaging Suppliers to:

- Provide safe, and high-quality authentic food products.
- Comply with all relevant national laws and requirements for food product safety and quality.
- Service providers to present minimal risk to our products

Refer to Hellers Food Safety and Quality Policy for further details.

Animal Welfare

We require our suppliers to:

- Treat animals with respect in accordance with all laws and regulations and codes of practices.
- Use humane procedures and sound practices designed to prevent the mistreatment of animals.
- Observe the proper handling and humane slaughter of animals.
- Practice responsible antibiotic stewardship.
- Adhere to the Five Freedoms framework which addresses the welfare of farmed animals by minimising negative experiences
 1. Freedom from hunger
 2. Freedom from discomfort
 3. Freedom from pain, injury or disease
 4. Freedom to express natural behaviour
 5. Freedom from fear and distress
- Move towards adherence to the the 'Five Domains Model' as defined by Mellor, D.J. (2016) in 'Updating Animal Welfare Thinking: Moving Beyond the 'Five Freedoms' Towards a 'Life Worth Living'',

Refer to Hellers Responsible Sourcing Policy for further details.

Antibiotics

The responsible use of antibiotics within our supply chains is essential to safeguarding animal health and welfare, particularly when animals are ill, while also mitigating the risk of antimicrobial resistance to human health. Hellers expect our suppliers to comply with WHO guidelines on the use of medically important antimicrobials in food producing animals, compliance to country legislation for the use of pesticide and veterinary medicines, and compliance to antimicrobial stewardship

No added Hormones

In New Zealand and Australia, it is illegal to use added hormones in food producing animals, such as poultry. Hellers expect our suppliers to ensure that meat supplied contains no added hormonal growth promotants including antibiotics, beta agonists and growth enhancers.

Genetics

Food Standards Australia New Zealand (FSANZ) mandates that any genetically modified (GM) food products must be clearly labelled. Hellers expects that raw materials supplied do not trigger GM labelling requirements under FSANZ regulations. This position also extends to cloned products, ensuring alignment with consumer expectations and regulatory compliance

Community Impact

Hellers supports its local communities and would like to partner with suppliers who are actively involved in supporting local communities.

Concerns & Whistleblowing

We encourage our Suppliers to:

- Operate an operational level grievance mechanism through which direct and indirect employees are able to raise concerns.
- Communicate actual or suspected breaches of this Code through our formal whistleblower process.

Refer to Hellers Whistleblower Policy for further details.

Review

The Company will review this code annually to ensure that it reflects any relevant legislative changes and remains consistent with Company values. The Company reserves the right to change this policy at any time and without notice.

Approved:



Christine Cash, Chief Executive Officer