



METCASH HUMAN RIGHTS & ANTI-SLAVERY POLICY

Definitions

Human rights are rights inherent to all human beings, regardless of race, gender, nationality, ethnicity, language, religion, or any other status. These fundamental rights have been outlined in Universal Declaration of Human Rights and include; the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education. Everyone is entitled to these rights, without discrimination.

Modern slavery is a term which covers a range of exploitative practices occurring in various forms such as slavery, child labour, excessive overtime, servitude, forced and compulsory labour and human trafficking.

Policy Basis

Metcash recognises human rights as set out in the International Bill of Human Rights and the core labour standards recognised by the International Labour Organization (ILO), as specified in the ILO Declaration on Fundamental Principles and Rights at Work. Metcash adheres to our obligations to comply with the requirements of the Australian Modern Slavery Act.

This policy describes our approach to upholding human rights, avoiding complicity in human rights abuses and minimising modern slavery risk. We expect that organisations who have, or are seeking to have a relationship with our company familiarise themselves with this policy and take verifiable actions to ensure compliance. This includes suppliers, employees, agency workers, contractors and consultants.

Commitment

Metcash is committed to being a responsible member of the communities in which we work and live, we respect the right of individuals belonging to groups or populations which may be particularly vulnerable, including; indigenous people, women, national or ethnic, religious and linguistic minorities, children, LGBT+ people, people with disabilities and migrant workers and their families.

Metcash opposes any form of slavery and is committed to minimising the risk of it occurring in its own business operations and supply chain, or through any other business relationship. Metcash expects suppliers to uphold the rights of employees and contractors in the supply chain including the rights of freedom of association, collective bargaining and a living-wage.

Metcash will only do business with organisations that fully comply with this Policy, or those who are taking appropriate and verifiable actions towards compliance.

Metcash response to human right & modern slavery

Metcash is committed to complying with relevant modern slavery legislation including respecting and upholding human rights across our operations and supply chains, or through any other business relationship.

Work being undertaken to underpin our commitment includes:

- Conducting risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery to help focus further efforts
- Applying supplier pre-screening and on-boarding processes to help identify modern slavery risk
- Engaging with our suppliers to convey our Modern Slavery Policy and to gain a deeper understanding of the measures taken by them to ensure modern slavery is not occurring in their business and their upstream supply chain
- Incorporating into our contractual documents specific prohibition against slavery and servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this Policy
- Undertaking audits and investigation where we identify high risks of modern slavery and are not satisfied that organisations with whom we do business are managing this appropriately
- Educating and training our people, suppliers and contractors on modern slavery, the application of this policy and associated processes
- Monitoring the effectiveness of our actions and improve our approach over time
- Implementing a Worker Speak-Up program to enhance our ability to directly hear from potentially vulnerable workers and improve grievance handling in our supply chain
- Collaborating with the suppliers to take the necessary remediation steps to address critical issues and eliminate risks

Responsibility for this Policy

The Metcash Board has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

The Group Leadership Team has primary and day-to-day responsibility for implementing this policy and monitoring its use and effectiveness.

Managers at all levels are responsible for ensuring their staff understand and comply with this policy and are given adequate and relevant training on it and the issue of modern slavery in supply chains.

Communication and awareness

Metcash will ensure that relevant employees, suppliers and contractors receive adequate training on this policy and any supporting processes applicable to their role.

All employees and contractors will be notified of this policy on joining and receive training as appropriate from time to time.

Breaches

Any breach of this policy will be taken seriously and dealt with on a case-by-case basis. A breach of this policy by an employee may lead to disciplinary action being taken.

A breach of this policy by a supplier will be dealt with on a case by case basis. Metcash recognises that modern slavery is a complex issue and will work with suppliers wherever possible to ensure the best outcome for the people at risk. This response may range from ceasing activities with the supplier to collaboration to improve performance.

Review

This policy will be reviewed by the Metcash Board at least annually and may be amended from time to time.