

Ethical Purchasing & Modern Slavery Policy



1. Purpose & Scope

Cirka expects certain universal and minimum standards of business conduct from our suppliers, workers and other stakeholders. Our Ethical Purchasing & Modern Slavery Policy sets out our commitment to ensure purchasing practices and standards are in place and promote safety, the environment and human rights.

This policy is available and will be communicated to all staff, workers, subcontractors and interested parties.

This policy, as part of the integrated management system, is reviewed annually for continuing suitability, regulatory compliance and opportunities for improvement.

2. Policy Statement

Cirka will purchase goods and services which are produced and delivered under conditions which do not abuse or exploit any person or the environment. It is each employee and supplier's responsibility to ensure that products and services are obtained from sources which respect health, safety, environment, product stewardship, product quality, social, legal and ethical standards along with sustainability requirements. These requirements form the key criteria of the evaluation and selection of goods and services purchased by Cirka.

Cirka expects certain minimum standards of performance, business behaviour and legal and ethical compliance from our suppliers and everyone associated with Cirka, including workers who deal with suppliers. These minimum standards are defined below:

Health, Safety and Environment

- The health and safety of our colleagues, customers, suppliers and local communities is of utmost importance to Cirka. We are committed to working towards a goal of zero injuries. Consequently, Cirka will endeavour to choose suppliers who place a high priority on health and safety.
- We are committed to protecting the environment and the application of sustainability practices in the conduct of our business. Cirka will endeavour to avoid relationships with organisations that are proven to violate locally applied pollution legislation or good sustainability practices. If our relationship is deemed a risk and the organisation in question fails to resolve its behaviour or performance, we will seek to terminate the relationship.

Labour and Human Rights

- We will only trade with suppliers or other businesses that pay their workers' wages and benefits that meet local industry benchmarks and national minimum requirements.
- We are committed to avoid working with suppliers who impose excessive working hours and poor or unsafe working conditions on their workers.
- We will only trade with suppliers who do not discourage or prevent their workers from joining trade unions and other workers' associations.

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- We will not trade with suppliers who abuse or intimidate their workers.
- We will not trade with suppliers who engage in any actions that may constitute modern slavery including but not limited to slavery, servitude, the worst forms of child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services (as set out in the Modern Slavery Act 2018).

Local Purchasing

- Cirka is committed to supporting the communities in which it does business. Cirka will, when appropriate, choose local suppliers to support the local economy.
- Cirka only obtains products and services from local Australian Suppliers. Suppliers are obliged to take the appropriate measures to ensure that no child labour occurs at suppliers' and their subcontractors' places of production.

Supplier Relationship Expectations

- We recognise the health, safety, environment, social, legal and ethical impacts of all supply and procurement decisions. We will involve our suppliers in addressing issues that may arise and expect our suppliers to assist us in minimising any negative effects and mitigating against any risks.
- Cirka reserves the right to terminate any relationship where a supplier fails to meet our quality, legal and ethical standards, after appropriate consultation.
- We have adopted and developed supply strategies that attempt to achieve best value for money that meet our business needs and are in accordance with legal and ethical standards.

Child Labour

- Cirka acknowledges child labour occurs in many countries, however does not accept child labour. Cirka's position is as set out below and we require that our suppliers and sub-contractors adhere to this code of conduct.
- General Principle is that Cirka supports the United Nations (U.N.) Convention on the Rights of the Child (1989). Our child labour position is based on this Convention, which stipulates:
 - "All actions concerning the child shall take full account of his or her best interests." Article 3.
 - "The right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development". Article 32.1.
- In addition, our position is based on the International Labour Organisation (ILO) Minimum Age Convention no. 138 (1973). According to this convention, the word "Child" is defined as any person below fifteen (15) years of age, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age would apply. If, however, the local minimum working age is set at fourteen (14) years of age in accordance with exceptions for developing

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countries, the lower age will apply. This Policy also incorporates the ILO Convention on the Worst Forms of Child Labour no. 182 (1999).


- If child labour is found in any place of production, Cirka will require the supplier to implement a corrective action plan. If corrective action is not implemented within the agreed time-frame, or if repeated violations occur, Cirka will terminate all business with the supplier concerned. The corrective action plan shall take the child's best interests into consideration, i.e. family and social situation and level of education. Care shall be taken not merely to move child labour from one supplier's workplace to another, but to enable more viable and sustainable alternatives for the child's development.
- The supplier shall effectively communicate to all its sub-contractors, as well as to its own co-workers, the content of this policy and ensure that all measures required are implemented accordingly.

Young Workers

- Cirka supports the legal employment of young workers. Young workers of legal working age have, until the age of 18, the right to be protected from any type of employment or work which, by its nature or the circumstances in which it is carried out, is likely to jeopardise their health, safety or morals.
- Cirka therefore requires all its suppliers to ensure that young workers are treated according to the law; this includes measures to avoid hazardous jobs, night shifts and ensure minimum wages. Limits for working hours and overtime should be set with special consideration to the workers' young age.
- All suppliers are obliged to keep Cirka informed at all times about all places of production (including their sub-contractors). Any undisclosed production centres found would constitute a violation of this code of conduct.

3. Policy Approval

The Company reserves the right to change or delete this policy at any time.

Signed: 

Dated: September 2020