



Policies and Procedures

Human Rights Policy

1.0 Purpose

This policy details how BIC Consolidated upholds fundamental human rights in accordance with the International Bill of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. Further, as a signatory to the United Nations Global Compact (UNGC) this policy reinforces our commitment to the following UNGC Human Rights Principles:

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

The policy provides a basis for how we embed the responsibility to respect human rights throughout our business.

In summary, we have a responsibility to:

- Uphold human rights over and above compliance with national laws and regulations.
- Respond effectively to human rights concerns.
- Ensure we are not complicit in human rights abuses.
- This responsibility extends to our own operations as well as across our value chain.

2.0 Scope

This policy applies without exception to all personnel of the Company. It applies when an employee acts as a representative of the Company in the course of the performance of the required duties of their role, taking action and making decisions for or on behalf of the Company.

The Company also expects our suppliers and other business partners to uphold the principles in this policy and urges the development of similar policies within their own businesses.

3.0 Non-negotiable Principles

We have zero tolerance for:

- Forced labour, bonded or compulsory labour.
- Child labour.
- Human trafficking.
- Discrimination.
- Harassment or abuse.
- Unsafe working conditions.
- Violations of freedom of association and collective bargaining.
- Inadequate wages and benefits, or excessive working hours.
- Unfair treatment in the workplace.
- Retaliation against employees who report a human rights abuse.
- Invasion of privacy.
- Environmental harm.

4.0 Definitions

The Company: refers to BIC Consolidated, part of the Bidvest Group of Companies.

Employee: a person who has accepted employment with the Company (whether permanent, fixed term or casual), contractors, consultants and directors wherever located.



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Supplier: an individual or organisation that provides goods or services to the Company.

Business partner: an individual or organisation that collaborates with the Company to achieve mutual business goals and objectives.

Forced labour: all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

Bonded labour: this is a form of slavery where workers are trapped in human trafficking by a debt.

Compulsory labour: any work or service that is exacted from any person under the menace of any penalty, and for which that person has not offered himself or herself voluntarily.

Child labour: work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

Discrimination: the unjust or prejudicial treatment of different categories of people, especially on the grounds of ethnicity, age, sex, or disability.

5.0 Commitment

In line with our Code of Conduct, the Company strives to establish a culture of openness, trust and integrity in business practices.

The United Nations Guiding Principles on Business and Human Rights set out the key elements of human rights due diligence, including assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed. BIC Consolidated understands that human rights due diligence is an ongoing process – one which is most effective when it is embedded in the risk management and procurement processes of our business. As such, we commit to implementing and updating appropriate systems and controls to identify and assess our human rights risks and integrating those findings to manage them effectively. We are committed to enhancing our capability to track the effectiveness of our responses and to communicating our human rights progress for external stakeholders, including in our annual modern slavery statement, made in accordance with the Modern Slavery Act 2018 (Cth).

We have a responsibility to avoid causing or contributing to adverse human rights impacts through our own activities and to address such impacts should they occur. We must also prevent or mitigate human rights impacts that are linked to our operations, even if we have not caused or contributed to these impacts.

Should adverse human rights impacts result from or be caused by our business activities, we are committed to provide for, or cooperate in, their fair and equitable remediation. The appropriate action will depend on whether we have caused the impact, contributed to it, or are linked to it through business relationships. In all cases, our focus will be on mitigating the risk to the individual(s) experiencing the impact and using our leverage to ensure appropriate remediation.

We are committed to proactively upholding human rights by:

- Exceeding all relevant laws and legislation.
- Adopting a robust approach to upholding human rights that is implemented across our business and supply chain.
- Fostering welcoming and safe work environments, including supporting our people's physical and mental health and fostering work-life balance.
- Promoting diversity, inclusion and equity, including respecting the rights of First Nations peoples, with zero tolerance for discrimination or harassment.



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- Engaging with our suppliers and procuring in a responsible manner, understanding that environmental and human rights risks exist within our supply chain.
- Engaging with potentially impacted stakeholders and other stakeholders to develop common and great practice approaches, including sharing learnings as appropriate.

6.0 Implementation

We understand that to deliver on our commitments we need to adopt a formal, consistent, and robust approach across our own operations and supply chain. While we understand our broader human rights risks, we adopt a risk-based approach that ensures that we devote resources and focus to the areas of human rights risk that have the potential for greatest impact. We review our priority human rights issues on an annual basis to ensure that we comply with evolving human rights laws and regulations and are prepared to address changing human rights risk. This ensures that we remain focused on continuous improvement and adopting best practice approaches to identification and management.

Our commitment to upholding human rights is embedded in:

- How we govern our business, our corporate values and Code of Conduct, as well as other key policies (see section 7 below).
- Our company-wide approach to risk management and compliance.
- Our company-wide approach to health and safety, certified to ISO45001.
- Our people practices that ensure our people feel included, supported and welcomed when working for our company. We ensure that all BIC Consolidated employees have a right to work at the Company and engage with our people regularly to understand how they feel about their work environment. Fair remuneration and an employee's right to collective bargaining underpin this approach, which is tested through regular audits. We are also focused on respecting the rights of First Nations Peoples with our actions to do this articulated in our Reconciliation Action Plan.
- Having in place grievance mechanisms that are known, trusted and accessible to those who need it. We maintain grievance and whistleblower mechanisms for stakeholders to raise concerns safely and confidentially regarding potential human rights impacts in our operations and supply chain. This enables us to address potential issues swiftly and appropriately. BIC Consolidated employees and external parties can confidentially report concerns about improper conduct through the whistleblower program. We understand that best practice engagement involves proactive efforts that go beyond grievance and whistleblower mechanisms. We use best endeavours to engage our own employees, our suppliers, and other stakeholders to better understand potential human rights impacts and increase awareness of human rights obligations.
- How we engage with our suppliers. Our Supplier Code of Conduct articulates the behaviour and conduct expected of organisations that we engage to provide us with goods and services. We implement this through our Responsible Procurement Approach which focuses on the identification and management of potential risks and building strong and transparent relationships. Increasingly this oversight includes supplier auditing. We ask our suppliers to adopt similar principles with their key suppliers, acknowledging that our supply chain extends beyond the suppliers with whom we have a direct contractual relationship.
- Treating the right to privacy as a fundamental human right. We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of Personal Information.
- How we continue to build our knowledge and understanding of human rights risks, including collaborating with community organisations and other not for profits such as the United Nations Global Compact, or the Cleaning Accountability Framework.
- Our public reporting. We report regularly on our activities regarding human rights, and as required under the Australian Modern Slavery Act 2018, and as per our commitments as a



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signatory to the United Nations Global Compact. This also enables us to track the effectiveness of our approach to managing human rights risks over time.

7.0 Related policies, procedures and guidelines:

- Code of Conduct
- Diversity & Inclusion Policy
- Equal Opportunity & Diversity Policy
- Complaints Management Policy
- Reconciliation Action Plan
- Health and Safety Policy
- Disability Action Plan
- Dispute Resolution Policy
- Privacy Policy
- Sustainability & Community Engagement Policy
- Supplier Code of Conduct
- Ethical Business Policy
- Sustainable Procurement Policy.

8.0 Ownership and version control

Policy Owner	General Manager, ESG
Version	1.0
Date	May 2024
Classification	Public
Revision Status	Updated
Author	Nina Collinson
Revision Date	May 2026

Revision	Description	Author
1.0	BIC/CPS original + Initial Draft	NC
1.1	CCO team review	CE, LD, SS
1.2	Executive Management Team Review	
1.5	Format and Re-brand	LD