



RESPONSIBLE SOURCING CODE

Titan is supported by several large and diverse supply chains, comprising global manufacturers and wholesalers as well as local small businesses.

We are committed to conducting our business with integrity, accountability, teamwork and innovation and by focusing on the needs of our customers. As members of the Elders group, we subscribe to the 'One Elders Values' which influence all our decision-making and underpin our key sustainability principle: **'We operate ethically and to the highest standard'**.

These are also the values we expect the people we work with – particularly our suppliers - to uphold.

ABOUT THIS CODE

Our Responsible Sourcing Code (**"Code"**) is informed by the International Labour Organisation (**ILO**) Conventions and the UN Universal Declaration of Human Rights.

It sets out the minimum ethical expectations we have of our suppliers. We strongly encourage our suppliers to exceed these expectations where possible.

IMPLEMENTATION

The implementation of this Code is monitored through our Ethical Contracting Framework. That Framework requires our people to assess and rate suppliers prior to engaging them, entering into or

renewing a contract, having regard to key risks to our businesses including modern slavery, human rights, safety and environmental risks.

Identified risks are considered by our Legal and Compliance Team, who work with our businesses to identify any remedial action available to mitigate the risk. Remedial action is determined on a case by case basis, taking into account the specific circumstances of individual suppliers. The impossibility of remedial action, or the unwillingness of a supplier to act, will likely result in our inability to work with them.

Given our supply chain's inherent complexity, it is not practical for us to monitor every supplier for compliance with this Code; particularly, suppliers at the beginning of our supply chains, where we have little to no visibility, influence or control. We expect our direct suppliers to ensure that the expectations set out in this Code are met by the suppliers in their own supply chains.

GRIEVANCE RESOLUTION

We encourage all our stakeholders to report any actual or suspected unacceptable conduct. Our Board has adopted a Whistleblower Policy to encourage and facilitate confidential disclosure. Contact details for our external whistleblower service provider are set out below:

STOPline: 1300 304 550

OUR MINIMUM ETHICAL EXPECTATIONS

COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

We expect suppliers to comply with all applicable laws and regulations in all relevant jurisdictions.

NO BRIBERY OR CORRUPTION

We expect suppliers to comply with all laws prohibiting the bribery of public officials and private persons, influence peddling and money laundering.

Suppliers must not offer any incentive, reward, promotion or gift to Titan or its officers, employees, agents or contractors without the prior written consent of Titan. Any such gift must not have a market value in excess of \$250.00 (AUD).

NO HUMAN TRAFFICKING

We expect that our suppliers are not directly or indirectly involved with any form of human trafficking.

Human trafficking means the recruitment, receipt or movement of a person by use of threat, force or other forms of coercion, for the purpose of exploitation.

NO SLAVERY, FORCED LABOUR OR DEBT BONDAGE

We expect our suppliers' operations to be free of all forms of slavery, forced labour and debt bondage.

For the purposes of this Code:

- **Slavery** means the exercise of power by a person or entity over another person as if that person was their property

- **Forced Labour** means any work that is performed by a person as a result of threat, deception or other form of coercion, which they are not free to stop
- **Debt Bondage** means work a person is forced to perform to pay off a debt, and:
 - » the reasonable value of the person's services is not applied to the debt; or
 - » the length and nature of the person's services are not limited or defined.

We expect workers to be:

- fairly paid in accordance with the terms of their employment or services agreement and applicable laws relating to minimum wage
- free to end their employment with or engagement by a supplier by providing reasonable notice.

NO CHILD LABOUR

We expect suppliers to comply with all applicable laws relating to minimum age of employment.

In the absence of such laws, we expect suppliers to comply with ILO Conventions 138 (Minimum Age Conventions 1973) and 182 (Worst Forms of Child Labour Convention 1999).

FREEDOM OF ASSOCIATION FOR WORKERS

We expect suppliers to respect the right of all workers to associate or not associate with groups of their choosing, provided these groups are legal in the country they are assembling in.

FAIR RECRUITMENT PRACTICES

Workers should not be required to surrender their passport, or any document related to their free movement as a condition of employment.

Workers should also not be charged any fees or costs for their recruitment or placement and the conditions of their employment should be fair and transparent.

ABILITY FOR WORKERS TO RAISE GRIEVANCES

Workers engaged by a supplier should be able to confidentially raise concerns or grievances with their employer.

A SAFE AND HEALTHY WORKPLACE

We expect suppliers to provide a safe and hygienic working environment for all workers.

Workers should be provided with suitable regular training, personal protective equipment and machinery to ensure they can perform their duties safely. They should also have an absolute right to refuse to work if they reasonably believe that to continue would risk their health and safety.

RESPECT FOR WORKERS

Workers should be treated fairly and respectfully, and suppliers should provide a safe workplace that is free from discrimination and harassment.

MANAGEMENT AND MITIGATION OF ENVIRONMENTAL IMPACTS

We expect suppliers to comply with all applicable environmental laws and regulations, and to demonstrate action to avoid, mitigate or minimise negative environmental impacts, including waste,

pollution and greenhouse gas emissions produced by their operations.

ANIMALS TO BE TREATED RESPECTFULLY AND HUMANELY

We expect suppliers of livestock and related services to treat animals respectfully and humanely, having regard to the Five Freedoms of Animal Welfare, namely:

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury or disease
- Freedom to express normal behaviour
- Freedom from fear and distress.

DATA TO BE SAFEGUARDED

We expect suppliers to have adequate security systems in place to protect unauthorised access to data (especially personal data).

DEFINITIONS

In this Code, the following terms have the following definitions:

- **Elders** means Elders Limited
ABN 34 004 336 636 and/or each of its subsidiaries.
- **Supplier** means any person or entity providing goods or services to Elders.
- **Workers** or **workforce** means all people providing services to a Supplier, including all employees, contractors, agents and migrant workers.

CONTACTS

STOPLine (External Whistleblower Service)

Phone: 1300 304 550

Elders Company Secretary

Phone: (08) 8425 5964

Email: companysecretary@elders.com.au