



Bega Group Ethical Sourcing Policy

The Bega Group (Bega), a leading Australian food and beverage business, recognises the need to observe the highest standards of corporate practice and business conduct in our interactions with our employees, customers, suppliers, business partners, the community and in the environment in which we operate.

We can only achieve this by acting ethically and responsibly in our sourcing activities throughout our supply chain.

Bega believes that ethical sourcing extends to our responsibilities across a breadth of areas including sustainability, environment, modern slavery, human rights and business ethics.

We therefore expect our suppliers and business partners to act in accordance with; and be guided by this policy in conjunction with the other policies below:

[Anti-fraud & corruption policy](#)

[Diversity, equity & inclusion policy](#)

[Environment policy](#)

[Whistleblower policy](#)

Our Commitment

The Group understands that when people are treated with respect, work in decent conditions and earn fair rates of pay, both they and their employer's benefit from increased engagement and productivity. Ultimately, our customers and consumers then benefit from higher quality, better value products/service. This is fundamental to our long-term business sufficiency, sustainability and growth.

Our Ethical Sourcing Policy is aligned with our commitment to the United Nations Sustainable Development Goals. Our policy is informed by the Ten Principles of the UN Global Compact and the International Labour Organisation (ILO) Declaration of Fundamental Principles and Rights at Work.

All new suppliers to the Group will be validated to meet or exceed the minimum standards of the policy.

Scope

This policy applies to all stages of our supply chain. We expect our direct suppliers to cascade these requirements within their own supply chains.

It is the supplier's responsibility to achieve, maintain and demonstrate compliance with the Group's Ethical Sourcing Policy, and ensure ethical sourcing practices within their own supply chains.

Where possible, the Group will support our suppliers to ensure compliance with this policy. However, we reserve the right to act decisively if required, which may involve the termination of contracts, or migrating supply of goods and services away from suppliers who act egregiously in choosing not to comply with the policy.

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Requirements

This Policy outlines the minimum standards required by suppliers in the provision of goods and services to Bega. In addition, suppliers are required to meet all local, country of operation and international laws regarding labour standards, health and safety, and the environment. Where two or more conflicting standards exist, we expect suppliers to abide by the stricter standard.

Supplier Requirements

Bega's suppliers must support socially responsible working conditions by:

1. supporting and respecting the protection of internationally proclaimed human rights
2. ensuring all actions are taken to not contribute to or cause human rights abuses
3. not using any type of forced, bonded or indentured labour
4. providing a safe and hygienic working environment that minimises risk to health, taking into consideration knowledge of the relevant industry and specific hazards
5. adhering to all applicable laws regarding working hours, wages, social security payments and overtime payments
6. not using child labour, whereby 'child labour' is defined as any work by a child or young person, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to interfere with that person's education, or be harmful to that person's health or mental, spiritual, moral or social development
7. upholding the freedom of association and the effective recognition of the right to collective bargaining – and where these rights are restricted under law, suppliers will not hinder the development of parallel means for independent and free association and bargaining
8. providing a workplace free from harassment, including sexual, verbal, and physical behaviour that creates an offensive, hostile or intimidating environment
9. not discriminating based on a person's race, gender, sexual orientation, age, nationality, marital status, religion, ethnic origin, union membership, political affiliation, or any other legally protected status; and
10. not using punishment or other forms of mental or physical coercion as a form of discipline.

Supplier Reporting

Bega, as a reporting entity under the *Modern Slavery Act (Cth) 2018*, employs the Supplier Ethical Data Exchange (Sedex) online portal for the secure exchange of ethical data with our suppliers which supports our annual reporting obligations.

Where directed, suppliers must register with Sedex and complete an annual ethical sourcing self-assessment questionnaire (SAQ). The Group, at its discretion, may also require an independent compliance audit (SMETA) of the supplier and/or its suppliers.

We expect our direct suppliers to adopt a similar approach in dealing with their own suppliers, and suppliers may be requested to supply evidence of it.

Bega's suppliers must conduct their business relationships with integrity through:

1. engaging ethically in all transactions and providing transparent documentation and records
2. not participating in bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, whether given to obtain business or otherwise; and
3. protecting whistle-blower confidentiality and prohibiting retaliation against workers who report workplace grievances

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Bega Requirements

The Group will:

1. report against supply chain risks and management in an annual Modern Slavery Statement
2. implement the Ethical Sourcing Policy
3. provide training and assessment programs for applicable employees based on roles and responsibilities
4. ensure the responsibilities of this policy are understood by the Group's leadership team
5. communicate the requirements of this policy and the expectation for our suppliers to comply
6. systematically review compliance and report non-conformances within our supply chain
7. monitor regulatory changes, court decisions or other issues impacting the Ethical Sourcing Policy to ensure it remains relevant; and
8. continually work with our suppliers across our supply chain to implement and sustain the requirements of this policy.

We actively encourage our employees to speak up if they are aware of any policy breaches. We also encourage our suppliers and customers to raise any issues of compliance or ethics they encounter within our company or supply chain. We recommend that any concerns are initially raised with the relevant Bega contact. However, it may also be an option for employees and suppliers to utilise Bega's confidential Whistleblower service. Reports can be made to the Whistleblower service via telephone, email, or internet.

Bega Your Call Whistleblower service:

Phone: 1300 913 271

Email: begadisclosures@yourcall.com.au

Website: www.yourcall.com.au/bega

Post: Bega Your Call Locked Bag 7777 Malvern Vic 3143

Bega does not tolerate retaliation by any of our employees against employees or suppliers for reporting a concern in good faith or assisting with an investigation.



Pete Findlay
Chief Executive Officer



Gunther Burghardt
Chief Financial Officer,

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