

SUPPLIER CODE OF CONDUCT

At Phyto-Therapy, we aspire to source the highest quality, organic and natural ingredients from around the world. We make sure that the principles of sustainable farming practice are followed, as well as the ethical and responsible conduct is carried out in all of our operations with respect for the environment and for the rights of all individuals.

Following our two key priorities, traceability and transparency, Phyto-Therapy have established this Supplier Code of Conduct to clarify the minimum standards expected from our business partners that are directly or indirectly part of our value chain. We are committed to put a great emphasis on creating a strong, long-term relationship with our supplier partners who not only share the same vision on sustainability and social responsibility, but also work with the same standards as we do.

Scope of application

This Code of Conduct applies to all business partners, referred as manufacturers, suppliers, warehouses, distributors - as well as their subcontractors and other suppliers (hereinafter referred also as business partners), that are in a business relationship with Phyto-Therapy.

Commitment

Business partners commit to have verification mechanisms and well-functioning management systems in place to implement, comply with and examine the principles laid down in this Code of Conduct. These shall include clear policies, an accountable organization, routines, communication and feedback mechanisms to identify, correct and improve social, health & safety and environmental impacts. When submitting information, the business partner is expected to be transparent and not intentionally mislead Phyto-Therapy.

Compliance with legislation, regulations and contracts

Business Partners shall comply with all applicable laws and regulations (including anti-corruption and bribery laws) where they conduct business and shall meet the contractual obligations established between the parties throughout the contract period.

Child Labour

The employment and/or exploitation of children is strictly prohibited. All legal limitations regarding employment of persons below the age of 16 shall be followed. They should be protected from any hazardous work, night shift and any kind of work that might hamper their development or impose any physical harm. Necessary measures shall be taken to prevent that no one under the legal age of employment is recruited.

Association

All employees, without exception or distinction, shall have the right to set up associations or organizations of their own choice for the purpose of promoting and protecting the interests of the employees. They shall also have the right to join or leave such associations or organizations, and to work for them without prior authorization, penalty or interference.

Discrimination

Any type of discrimination in hiring, compensation, access to training, promotion, termination or retirement is prohibited. In particular, any active or passive distinction, exclusion or preference made on the basis of race, caste, color, age, gender, pregnancy, religion, political opinion, membership of an employee organization, disease, physical or mental disability, ethnic, national or social origin, marital status, job position, nationality, sexual orientation or other personal characteristics. Business partners shall have a grievance mechanism in place enabling employees to put forward complaints without risk of retaliation.

Positive Work Environment

Employees, indiscriminately, shall be treated with equality, dignity and respect. Sanctions, fines, other penalties or disciplinary measures may only be taken in line with current national and international standards and with internationally recognized human rights. No employee shall be subjected to any form of harassment, coercion or abuse, including, without limitation, verbal, mental, physical, psychological, sexual and/or bodily force at his workplace.

Compliance with trade-and export regulations

Exporters ensure that all applicable export control regulations (for example, the EU and US), also outside of the respective territory is adhered to and complied with. Business partners pay close attention to customs and foreign trade regulations including those for security in the supply chain in case of trading and transportation of goods, provision of services or other transfer of technical know-how or software.

Forced laboratory

Business Partners will not use any form of forced and compulsory labor, debt bondage, servitude or slave labor and conditions akin to slavery (including, without limitation, prison labor, bonded labor, indentured labor). No employee may be directly or indirectly compelled to work through force and/or intimidation. Employees shall not be required to lodge "deposits" and shall be free to leave their employment after reasonable notice.

Working hours and overtime

Working hours must comply with the strictest requirements in force at any given time under current law and regulations. A working week shall not exceed 48 hours or 60 hours if overtime is included. The

employee is entitled to at least one day off after working for six days in a row. Any overtime shall be remunerated in accordance with domestic standards, must take place on a voluntary basis and shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

Wages and benefits

The wages, overtime and benefits paid meet, at a minimum, national legal level, industry level, or collective bargaining agreement, whichever is higher. In any event, a fair living wage should always be enough to meet the basic needs of employees and their families, and provide some discretionary income. Compensation shall be provided in a way that is prompt and easily understood. All fringe benefits required by law or contract are provided. Conditional payments or disciplinary deductions are not tolerated. The employee shall be granted and correctly compensated for any type of paid leave to which they are legally entitled.

Documentation of employment relationship

All work performed must be on the basis of recognized employment relationship established through national law and practice. Business Partners shall provide to their employees a written documentation, in their own language, with the conditions of employment (e.g. the commencement and end of the employment relationship, working hours, salary and bonuses) in relation to the manufacturing phases directly concerning them. The name, date and place of birth and, if possible, the home address of the employee shall be recorded. Obligations to employees, under labor or social security laws and regulations arising from the regular employment relationship, shall not be avoided through the use of labor-only contracting, fixed-term contracts or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

Workplace health and safety

Employees are provided a safe, hygienic, and healthy workplace that is in compliance with all applicable laws and regulations. Business partners shall provide policies, systems, and trainings to promote health and safety and prevent injury. With this in mind, business partners shall set up systems capable of detecting and preventing any potential hazards to the health and safety of its employees. Furthermore, they shall regularly keep the employees informed and trained regarding current workplace health and safety regulations and safety measures. Adequate ventilation and temperature, clean toilets and access to drinking water in sufficient quantities shall be ensured. If sleeping quarters are provided to the employees, they must be separated from the workplace and must be clean, safe and fulfill basic requirements. Business partners shall accommodate the needs of pregnant workers.

Environmental impact

Business partners shall comply with all applicable environmental laws and regulations in the jurisdictions in which they operate. This includes laws and regulations related to air quality, air emissions, water conservation, water quality, water use, waste, re-use, recycling, and energy efficiency. It is expected that ongoing efforts will be made to prevent and mitigate environmental burdens. Any procedures and standards in force for waste management, handling chemicals and other

hazardous substances and their disposal and those pertaining to emissions and waste water treatment shall be observed. Phyto-Therapy will continuously seek out business partners who provide proactive leadership and partnership in reducing these impacts.

Code of Conduct Implementation

Business partners will post, implement, and integrate this Code and supporting guidelines into their operations and will ensure compliance among their sub-contractors.

Monitoring the Code of Conduct

Phyto-Therapy is responsible for ensuring compliance with the principles laid down in this Code of Conduct. If requested by Phyto-Therapy, the business partners are obliged to conduct a social audit at the production sites. Business partners guarantee that if needed, Phyto-Therapy's employees or third parties authorized by it are entitled to examine compliance with the principles laid down in this Code of Conduct by those directly or otherwise engaged by it. Phyto-Therapy's employees or authorized third parties are entitled to visit unannounced Business partners. Business partners will also give Phyto-Therapy or authorized third parties unrestricted access to all its production sites and plants.

Sanctions and remedial measures

Phyto-Therapy is entitled to monitor the principles laid down in this Code of Conduct. If non-compliance is detected, the business partners are obliged to immediately take appropriate remedial measures. If appropriate measures are not implemented, or non-compliance is still detected after its report, Phyto-Therapy has the right to terminate the business relationships with the business partners.

Notification

Complaints or information concerning violations of this Code of Conduct may be reported in local language to jack@phytotherapy.com.au. Phyto-Therapy will place the highest priority on confidentiality of information and identity protection when investigating and acting on this information. All the business partners guarantee that they will abstain from taking any disadvantageous or disciplinary measures against the person filing the complaint.

Subcontracting

Phyto-Therapy does not permit subcontracts without our prior written approval. All production orders must be produced within facilities that have been approved by Phyto-Therapy, without exception. The suppliers are required to continuously monitor approved subcontractors and sub-suppliers for social and environmental responsibility using standards that meet or exceed this Code.

Animal welfare and biodiversity

Suppliers must ensure the goods sourced to the manufacturer do not come from countries or regions where animal welfare or biodiversity is not respected or where the activity results in deforestation. It is supplier's responsibility to adopt mechanisms to ensure and prove the above guidelines are followed.

Transparency

Phyto-Therapy and our suppliers are responsible and have the goal to ensure social and environmental responsibility and the integrity of our product content claims throughout the supply chain. Phyto-Therapy believes transparency and traceability is a crucial step to transform the industry and work towards this goal. Therefore, Phyto-Therapy requires suppliers to map and continuously track and monitor all locations in all levels of its supply chain and, upon request, provide transparency information into the owned and/or subcontracted farms, mills, plants, factories and other sites that are involved in the production of Phyto-Therapy's products.

By signing this agreement, we hereby confirm that we share, respect and adhere to and apply the values as stated in the whole Supplier Code of Conduct.

Sincerely,

Miles Wayne



CEO
Phyto-Therapy Pty Ltd