

Brambles

Human Rights Policy

Brambles Limited

Revised: 1 January 2020

Version 2.0

HUMAN RIGHTS POLICY

Scope

This Human Rights Policy applies to all directors, officers and employees of Brambles and each of its Group Companies. All are expected to comply with this policy and conduct their activities on behalf of Brambles accordingly. Brambles and its Group Companies also are committed to working with joint venturers, suppliers and other third parties who uphold the principles in this Policy or who adopt similar policies within their businesses. To this end, suppliers and other third parties are asked to acknowledge Brambles' Supplier Policy, which is aligned with the expectations and commitments of this Human Rights Policy.

Policy

As set out in Brambles' Code of Conduct, respect for human rights is fundamental to Brambles and its Group Companies and to the communities in which we operate. In Brambles and across our Group, we are committed to ensuring that people are treated fairly with dignity and respect and to engaging with our local community stakeholders—including those from indigenous or other at risk populations—to ensure that we are listening to, learning from, and taking into account their views and respecting their respective cultures, heritages, and traditional rights as we conduct our business.

Brambles' Human Rights Policy is guided by the Code of Conduct, which, in turn, is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. As a demonstration of our commitment to these principles, Brambles is a signatory to the United National Global Compact ("UNGC") and continues to support the UNGC's Ten Principles in the areas of human rights, labor, environment, and anti-corruption.

Valuing Diversity

Brambles values the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equal opportunity and have no tolerance for discrimination or harassment of any kind. We are dedicated to maintaining workplaces that are free from discrimination or harassment on the basis of race, sex, colour, nationality or national origin, class, religion, age, disability, marital status, sexual orientation or gender identification, political opinion, or any other status protected by applicable law.

In every country and culture, Brambles aims to be an employer of choice. We recruit, hire, place, train, compensate, and advance the best people for the job on the basis of merit and job-related competencies—without discrimination.

Regardless of personal characteristics or status, Brambles does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind in the workplace and in any work-related circumstance outside the workplace. Brambles' commitment to these values is set out in its Diversity Policy.

Forced Labour and Human Trafficking

As set out in the Code of Conduct, Brambles prohibits—in its own operations and those of its suppliers—the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour, and any form of human trafficking.

Brambles recognizes that one of the most vulnerable groups can be migrant workers who have travelled within country or from overseas to obtain employment. To offer the greatest protection to this class of workers, Brambles ensures that: (1) migrant workers have exactly the same entitlements as local employees; (2) any commissions and other fees associated with employment of migrant workers must be covered by the company, not the migrant workers; and (3) migrant workers are not required to turnover their identification documents, except as is briefly necessary to verify identity and employment eligibility.

Child Labour

Brambles will not tolerate child labour in its own operations and those of its suppliers.

We believe that **all** labour is harmful, exploitative or destructive if it begins at too early an age. As a result, we do not employ children—and we do not do business with suppliers or other third parties who employ children—under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is higher. In addition, we will not employ any person under the age of 18 years if they may be engaged in work which could be categorized as hazardous and we will not tolerate suppliers or third parties who do so.

Indigenous Peoples

We respect the rights of indigenous peoples where they are affected by our business.

Work Hours, Wages and Benefits

Brambles recognizes that wages are essential to achieving an adequate standard of living. We operate in full compliance with all applicable wage, work hours, overtime and benefits laws. Additionally, Brambles will only do business with suppliers and other third parties who comply with applicable wage, work hours, overtime and benefits laws.

Safe and Healthy Workplace

Brambles strives to provide a safe and healthy workplace for all its employees and complies with applicable safety and health laws, regulations and internal requirements. For more information on this topic, please consult Brambles' Zero Harm Charter and the Health and Safety Policy set out in the Code of Conduct, as well as local business health and safety policies.

Further, Brambles is committed to maintaining a workplace that is free from violence, intimidation and other unsafe or disruptive conditions due to internal or external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity.

Freedom of Association and Collective Bargaining

As set out in the Code of Conduct, Brambles respects our employees' right to join, form, or not to join a labour union without fear of reprisal, retribution, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. Brambles is committed to bargaining in good faith with such representatives.

Responsibility For The Success Of This Policy

The Brambles' Board has overall responsibility for this Policy. The Chief Compliance Officer has day-to-day operational responsibility for this Policy and should ensure that all employees receive regular and appropriate training.

The Chief Compliance Officer, in conjunction with the Board, will review this policy from a legal and operational perspective at least one a year. This Policy does not form a party of any employee's contract, or otherwise create one, and it may be amended from time to time. Employees are invited to comment on this Policy and suggest ways in which it might be improved. Comments or suggestions should be addressed to the Chief Compliance Officer.

Reporting Concerns or Wrongdoing under Brambles' Speak Up Policy

Brambles creates workplaces in which open and honest communications among all employees are valued and respected. If you have any questions about this Human Rights Policy, or if you would like to report a potential violation of it, please speak to your line manager, your local Human Resources Representative, or any member of the Legal or Executive Teams. Where permitted by local law, you also may report suspected violations of this Policy through the Brambles Speak Up Hotline by visiting the website at www.brambles.ethicspoint.com or by calling the appropriate telephone number for your location, which can be found on the Speak Up posters located throughout your workplace.

Consistent with Brambles' Speak Up Policy, no reprisal or retribution will be taken against any employee for raising concerns under this Human Rights Policy. Brambles is committed to investigating, addressing, and responding to the concerns of employees and to taking appropriate corrective action in response to any violation.