

## SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE YEAR ENDED 30 JUNE 2019

Brambles Limited, on its behalf and on behalf of the subsidiaries set out in Annexure A (collectively, Brambles), makes the following statement on slavery and human trafficking.

### **BUSINESS AND ORGANISATIONAL STRUCTURE**

Brambles carries out a supply-chain logistics business operating primarily through the CHEP brand. Brambles Limited, the ultimate holding company, is listed on the Australian Securities Exchange (ASX) and, its global corporate headquarters are located in Sydney, Australia. Brambles also has corporate offices located in London, UK. Brambles operates in more than 60 countries, with its largest operations in North America and Western Europe.

Brambles primarily serves customers in the fast-moving consumer goods (e.g., dry food, grocery, and health and personal care), fresh produce, beverage, retail and general manufacturing industries, counting many of the world's best-known brands among its customers. Brambles provides supply-chain logistics services to these customers, based upon its longstanding expertise in the management of reusable unit-load equipment such as pallets, crates containers and kegs. Brambles also operates specialist container logistics businesses serving the automotive sector.

Brambles carries on business in the UK through the subsidiaries listed in Annexure A.

Additional information about Brambles can be found on its website at [www.brambles.com](http://www.brambles.com)

### **BRAMBLES' POLICY AND PRINCIPLES ON SLAVERY AND HUMAN TRAFFICKING**

#### **The Code of Conduct**

Brambles' Code of Conduct provides the ethical and legal framework for all employees in the conduct of Brambles' business. It sets out how Brambles relates to its customers, employees, shareholders, suppliers and the community. The Code applies to everyone working for Brambles and requires all of its employees to comply with all applicable legal requirements, including all prohibitions against forced, bonded or compulsory labour, human trafficking or other kinds of slavery, at all times.

#### **Human Rights Policy**

Brambles' Human Rights Policy, which is a schedule to the Code of Conduct, was approved and adopted by the Brambles Limited Board in November 2016. This Policy, which articulates in a single-standalone document the various human rights principles advanced throughout Brambles' Code of Conduct, 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. Amongst others, it prohibits—in Brambles' operations as well as those of its suppliers—the use of forced, bonded or compulsory labour, human trafficking or other kinds of slavery.

As a demonstration of its 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. Brambles' annual Communication on Progress can be found under Sustainability at [www.brambles.com](http://www.brambles.com). Further, in September 2016, Brambles signed the CEO Statement of Support for the United Nations Sustainable Development Goals, which includes a set of goals to end poverty, fight injustice and inequality, and protect the planet by 2030.

## **Zero Harm Charter**

Brambles has also adopted a Zero Harm Charter. It sets out Brambles' commitment to achieving zero injuries, zero environmental damage and zero detrimental impact on human rights. The principles set out in the Zero Harm Charter, which is available on Brambles' website, include that every Brambles employee will care for the human rights of those affected by its operations.

## **Speaking Up Policy**

Brambles encourages everyone working for it to report suspected breaches of the Code of Conduct or any other policy, including the Human Rights Policy and the Zero Harm Charter. These complaints may be made through various channels, including, where legally permissible, the Brambles Speak Up Hotline. The Brambles Speak Up Hotline is a confidential hotline, operated in local language by an independent company, available to all employees and, where legally permissible, suppliers at no charge 24 hours a day, 7 days a week. All complaints submitted to the Brambles Speak Up Hotline are assessed and investigated as necessary.

To date, Brambles has not received any reports or concerns of forced, bonded or compulsory labour, human trafficking, or other kinds of slavery involving its operations.

## **SEDEX AND ECOVADIS RISK ASSESSMENT**

CHEP is a member of SEDEX, which promotes improvements in ethical and responsible business practices, and makes information about its operations, including its UK operations, available to customers through SEDEX's website at [www.sedexglobal.com](http://www.sedexglobal.com)

Moreover, CHP participates in Ecovadis, an organization which provides supplier sustainability ratings and, many of its business units undergo Ecovadis' independent corporate social responsibility assessment on an annual basis. Amongst others, these assessments examine the business units' fundamental human rights practices and controls. The resulting Ecovadis scorecards from these assessments are made available to customers through Ecovadis' website at [www.ecovadis.com](http://www.ecovadis.com)

## **MANAGING SLAVERY AND HUMAN TRAFICKING RISKS IN BRAMBLES SUPPLY CHAINS**

### **Risk Assessment**

Brambles has adopted a risk management framework, the objectives of which include to incorporate effective risk management as a part of Brambles' strategic planning process, to require business operating plans to address the effective management of key risks and to embed a strong risk management culture. As a part of that framework, Brambles' headquarters and each of its businesses has a risk and control committee (RCC). Each RCC conducts an in-depth review on a regular basis of the risk profile of the relevant business unit, or of Headquarters, as the case may be, including their respective material economic, environmental and social sustainability risks and identify and assess the effectiveness of mitigants for those risks.

During 2015, Brambles also established a Sustainability Risk Committee (SRC). The role of the SRC is, amongst others, to identify, assess, monitor and report on Brambles' exposure

to sustainability risks, determining whether the Group has a material exposure to any sustainability risks and monitoring new and emerging sustainability risks.

Pursuant to the process in its risk management framework, Brambles has assessed the risk of slavery and human trafficking in its UK operations. In doing so, Brambles considered the location of its operations, "right to work" checks, the jobs performed, and the absence to date of reports of slavery or human trafficking concerns. Brambles believes, based on this assessment, that the net risk of slavery and human trafficking in its UK operations (and in all Brambles' operations) is low.

Brambles has also assessed the risk of slavery and human trafficking in its UK operations' supply chains and notes the mitigants in place with respect to lumber. Brambles' UK operations purchase lumber from

suppliers in the UK and other European countries, including Russia and Estonia. In Financial Year 2019, all such lumber suppliers produced a Chain of Custody Certification to either the Forest Steward Council (FSC) standard or the Program for the Endorsement of Forest Certification (PEFC) standard. Before an FSC or PEFC Chain of Custody Certification can be issued, these lumber suppliers must demonstrate, amongst others, that they protect and promote workers' rights and abide by applicable law. To maintain these Chain of Custody Certifications, the lumber suppliers must satisfactorily pass FSC or PEFC audits on an annual basis.

## **Expectations of Suppliers**

Brambles' Code of Conduct also provides that Brambles is committed to working with suppliers to develop more efficient, safer and sustainable supply chains by abiding by the principles and values outlined in the Code of Conduct. To that end, Brambles has a Supplier Policy, which is a schedule to the Code of Conduct, and requires its suppliers to, amongst others:

- Conduct their businesses in accordance with the laws and regulations of the countries in which they are located;
- Show respect for the diverse range of people and cultures with whom Brambles work and their human rights;
- Abide by the same minimum working age requirements outlined in the human rights statement in the Code of Conduct; and
- Follow the principles in Brambles' Zero Harm Charter.

Before any new supplier is onboarded at Brambles, Brambles carries out risk-based due diligence. Under this due diligence program, new suppliers are assessed for human rights risk, amongst other risks. Suppliers in high risk geographies or in high risk industries (e.g., lumber) must undergo enhanced due diligence.

Suppliers are also asked to sign up to the Supplier Policy and Brambles' compliance terms and conditions or, alternatively, to certify compliance with, amongst others, Brambles' prohibition of child labour, forced, bonded or compulsory labour, human trafficking or other kinds of slavery. Brambles reserves the right to terminate its relationship with a supplier if issues of noncompliance with the Supplier Policy or its principles are discovered and not addressed in a timely manner.

## **TRAINING**

Brambles' mandatory Know the Code training module is designed to help its employees understand the underlying principles set out in the Code of Conduct, and, amongst others, this module contains a chapter devoted to human rights, offering specific guidance on how to identify and report suspicions of child labour and forced, bonded or compulsory labour, human trafficking or other kinds of slavery. This mandatory Know the Code training module is assigned to all white collar employees during their induction. As of 30 June 2019, 10,743 employees at Brambles have completed this training, including 1,113 in Fiscal Year 2019.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of Directors of Brambles Limited.



**Stephen Johns**  
**Chairman**  
**Brambles Limited**

## ANNEXURE A

### **Brambles Limited Subsidiaries Carrying on Business in the UK for The Year Ended 30 June 2019**

BFIM Limited

BIP Industries Limited

Boxpal Limited

Brambles Enterprises Limited

Brambles Services UK Limited

Brambles Finance plc

Brambles Holdings (UK) Limited

Brambles Holdings Unlimited

Brambles Investment Holdings Limited

Brambles Investment Limited

Brambles Investments plc

Brambles Nominees Limited

Brambles Officers Limited

Brambles U.K. Limited

CHEP Pallecon Solutions Ltd

CHEP UK Limited

Cyan Logistics Limited

IFCO SYSTEMS UK Limited

Kegstar UK Limited

Polybulk Limited

Rail Car Services Limited

BXB Digital Limited (formerly Technological and Management Services Limited)

CHEP Intercontinental Containers Limited

Wrekin Roadways Limited