

Ethical Sourcing

Continuous Improvement Supplier Guide

This guidance document is provided for informational purposes only and outlines practical steps suppliers can take to meet Coles' Ethical Sourcing standards. These guidelines are comprehensive, but not exhaustive. They cover the key elements of what is advisable to reach mandatory requirements and to progress toward good and best practice. It is up to each supplier to determine what is required to comply with its contract with Coles, including compliance with Coles' Ethical Sourcing Policy.

Coles' guidance on continuous improvement does not constitute legal advice and does not relieve suppliers of their obligations to consult legal professionals, as appropriate, on contractual terms and obligations, and on how to comply with all laws and regulations relevant to them in the countries where they operate. In addition, the guidance does not preclude the supplier from going beyond what is suggested.

1. Business is conducted lawfully, responsibly and with integrity

Relevant Coles Ethical Sourcing Policy Requirements:

Compliance with Local Laws

- All suppliers must fully comply with all local laws and regulations regarding labour, health, safety and the environment.
- Suppliers must also fully comply with the legal requirements of the countries in which they operate in addition to all elements of the Ethical Sourcing Policy.

Business Integrity

- Suppliers must engage professional ethics in all dealings, and not act in any manner which, by association, may bring Coles into disrepute.
- Bribery, facilitation payments, secret commissions or payments and any money laundering (whether directly involving a public official, private company or individual, and whether directly or indirectly through a third party), are strictly prohibited.

Illegal labour

- Suppliers must not use illegal labour.
- Suppliers must be able to verify the legal entitlement of their employees to work in the country of employment.

Environment

- Suppliers must comply with local and national environmental laws and regulations.
- Suppliers must manage their waste, wastewater, and pollutants responsibly and seek to improve their environmental performance. This includes ensuring that communities' access to water is not negatively impacted by the suppliers' operations.

Land Rights

- Suppliers will ensure appropriate steps are taken to identify and respect legitimate tenure rights holders when acquiring, leasing or using land.

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- 1.1. The supplier has clearly established and documented procedures to ensure that all applicable laws and regulations are adhered to. These procedures are tailored to meet the size and risk profile of the supplier's business.
- 1.2. Senior management are engaged and have oversight of the content and implementation of their compliance framework. Supplier's executive management and leaders are held accountable for compliance and conducting business with integrity.
- 1.3. There is a clear commitment to zero tolerance of bribery and/or corruption in all forms.

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- 1.3.1. **Good practice looks like** a set of organisational values / Code of Conduct establishing a commitment to legal and regulatory compliance, integrity and business ethics.
 - 1.3.2. **Best practice extends further** to the establishment of grievance channels available to all workers, allowing for anonymity and a zero-tolerance approach to retaliation.
- 1.4. A regular risk assessment is undertaken to identify key compliance risks. This means identifying the business' exposure to legal penalties, financial forfeiture and material loss due to failure to act in accordance with local laws and regulations.
- 1.5. Clear and effective internal training and/or guidelines are in place to embed a culture of integrity and mitigate key risks.
 - 1.5.1. **Good practice looks like** guidelines that are readily available to all workers and cover bribery, gifts and hospitality, conflicts of interest, handling competitor information and anti-competitive behaviour.
 - 1.5.2. **Best practice extends further** to the establishment of a documented procedure to monitor and measure the effectiveness of the Code of Conduct, guidelines, policies and/or training.
- 1.6. Appropriate due diligence checks are conducted in respect of third-party relationships (e.g. labour hire providers), whether new or ongoing, to ensure they meet local laws and regulations.
 - 1.6.1. **Good practice looks like** a code of conduct or responsible sourcing policy for third party relationships or direct suppliers, consistent with the principles of Coles' Ethical Sourcing Policy. This includes a process to communicate this to all direct suppliers and monitor compliance.
 - 1.6.2. **Best practice extends further** to a process to communicate and monitor all direct suppliers' compliance against the code of conduct or responsible sourcing policy.
- 1.7. Financial procedures ensure the proper recording of all financial transactions. They ensure that no undisclosed or unrecorded account, fund or asset is established or maintained.
- 1.8. Procedures and mechanisms are in place to ensure that all confidential information, whether business, product, or people related, is safely stored with limited access rights on a need-to-know basis only.
- 1.9. Procedures are in place to ensure that any product quality or safety concerns originating from the supplier or its supply chain are notified to Coles without delay.
- 1.10. The supplier must be able to verify the legal entitlement of their employees to work in the country of employment; this includes workers sourced from a referral agent, labour hire provider, contractor or subcontractor.
 - 1.10.1. In Australia, **good practice looks like** undertaking a search of the Australian Government's Visa Entitlement Verification Online (VEVO) system, and retaining records of the worker's passport, visa and VEVO check.
- 1.11. There is an environmental policy, covering the supplier's environmental impact, which has been communicated to all relevant stakeholders, including their own suppliers. The policy contains defined procedures for implementation and management of environmental performance.
 - 1.11.1. **Good practice looks like** all workers being provided with training on environmental issues so that they are aware of how they can contribute to reduction in environmental impacts. This includes training on minimising wasteful resources such as switching off lights or machinery when not needed.
 - 1.11.2. **Best practice extends further** to the supplier sharing best practice with their own suppliers and making an effort to reduce environmental impact throughout its supply chain.
- 1.12. The supplier is aware of the local and national environmental laws and regulations and is measuring their performance against those.
- 1.13. The supplier must have all the relevant permits in place for all aspects of its environmental impacts.
 - 1.13.1. **Good practice looks like** making environmental certifications or environmental management systems documentation readily available for review at all times.

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- 1.13.2. **Good practice looks like** checking that any third parties involved in the supplier's operation also have the legally required permits and licenses to operate, such as hazardous waste permits.
- 1.14. The supplier is aware of the main environmental impacts of their sites and processes, and regularly seeks to improve their environmental performance.
 - 1.14.1. **Good practice looks like** the supplier investing in green technologies and training all employees on how to reduce their own personal impact on the environment.
 - 1.14.2. **Good practice looks like** the supplier demonstrating that they have researched new ways of working to reduce the amount of chemicals required.
 - 1.14.3. **Good practice looks like** the supplier actively changing its production techniques to avoid certain processes that require the use of polluting chemicals.
 - 1.14.4. **Best practice extends further** to actively supporting the local environment by contributing to regeneration of green spaces in the local community.
- 1.15. The supplier measures its environmental impacts through continuous recording and regular reviews of use and discharge of natural resources such as water, energy, waste and emissions.
- 1.16. There is a designated person responsible for managing environmental issues, including dealing with land use change, conservation and deforestations, and for coordinating the supplier's efforts to improve environmental performance.
- 1.17. There are policies and procedures in place which cover land use and any land use changes to recognise and apply national laws relating to nature conservation and deforestation.
 - 1.17.1. **Good practice looks like** the establishment of grievance mechanisms that cover land rights issues and disputes.

2. Workers are treated equally with dignity and respect

Relevant Coles Ethical Sourcing Policy Requirements:

Harsh or Inhumane Treatment

- Physical abuse or physical discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.

Discrimination

- There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status such as disability, age, marital and family status, sexual orientation and gender identity, health status, place of residence, economic and social situation.
- Responsibility should be allocated to ensure women's health and rights are considered and appropriate actions are taken by management to address concerns or issues when they arise.

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- 2.1. Suppliers have established policies that prohibit discrimination of any form on the basis of race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status such as disability, age, marital and family status, sexual orientation and gender identity, health status, place of residence, economic and social situation.
 - 2.1.1. **Good practice looks like** policies that prohibit discrimination are readily available to all workers.
 - 2.1.2. **Good practice looks like** establishing selection criteria for all human resource decisions, to ensure they are objective and transparent, and controls are in place to prevent subjective decisions.

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- 2.1.3. **Best practice extends further** to training staff members responsible for hiring, paying, training, promoting, disciplining and terminating workers to avoid discrimination in the exercise of their duties.
- 2.1.4. **Best practice extends further** to include establishing specific and measurable targets for achieving equality between women and men and taking affirmative action to attain them.
- 2.2. The policies or procedures to prohibit discrimination highlight actions to protect the rights of any worker considered vulnerable to discrimination.
 - 2.2.1. **Good practice looks like** all workers and their managers are trained to recognise and prevent harassment, abuse and other forms of intimidation.
 - 2.2.2. **Best practice extends further** to establish programmes addressing the needs of the most vulnerable workers, such as flexible time options, and mentoring programmes.

3. All workers are of an appropriate age

Relevant Coles Ethical Sourcing Policy Requirements:

Child Labour

- Suppliers must not use child labour. Child labour is defined as work that deprives children of their childhood, the opportunity to attend school and fulfil their potential, and that is harmful to their physical and mental development.
- Suppliers must be able to verify the age of all employees to ensure no child labour is used. Coles refers to the International Labour Organization's Minimum Age Convention, 1973 (No. 138) definition and guidance on child labour, in the absence of strong legislative child labour protections.
- In the event that child labour is identified, suppliers shall prioritise the welfare of the child, and ensure that a remediation plan placing the child's welfare as paramount will be put in place with plans to prevent re-occurrence.

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- 3.1. An employment policy is in place specifying the minimum age for employment, together with effective procedures and means of age verification to implement this policy.
 - 3.1.1. **Good practice looks like** all relevant supervisors are trained to respect the provisions for young workers, apprentices and interns, especially with respect to hours of work, night shifts, weekend work, and heavy or dangerous work.
 - 3.1.2. **Good practice looks like** ensuring labour hire providers have a process in place to verify the age of workers.
- 3.2. In all circumstances the health and safety of young workers are considered and protected. This protection should preclude them from certain types of work such as hazardous or night work and requires extra care and commitment.

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4. Work is freely agreed and regular, with documented terms of employment

Relevant Coles Ethical Sourcing Policy Requirements:

Forced/ Bonded Labour

- Suppliers must not use any form of servitude, forced, bonded, involuntary prison, indentured, trafficked, or involuntary labour.
- Employment must be freely chosen.
- Workers must be given freedom of movement. Workers must not be required to lodge deposits or identity papers with suppliers.
- Workers must be free to leave their employment after reasonable notice has been given.
- Suppliers must take steps to recruit responsibly. This includes not engaging in deceptive recruiting practices, including the charging of fees or recruitment charges (or repaying any such fees charged), by providing migrant workers an understandable and accurate employment contract in their spoken language, and by holding agents and recruiters to the same standards.

Wages and Benefits

- Wages and benefits paid for a standard working week must, as a minimum, meet national or industry standards, whichever is the higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income for workers and their families and/or dependents.
- All workers must be provided with written and understandable information about their employment conditions in respect to wages, before they enter employment, and about the particulars of their wages for the pay period concerned each time they are paid.
- Deductions from wages may only occur with the express written permission of the worker concerned and where permitted by law.
- Deductions from wages for disciplinary measures are not permitted.
- Accurate and complete records of wages and benefits paid to each worker must be maintained.

Regular Employment

- To every extent possible, work performed must be on the basis of recognised employment relationship established through national law and practice.
- Workers who have a regular employment relationship with their employer are afforded obligations from their employer relating to labour and social security laws and regulations. These obligations shall not be avoided through the use of labour-only contracting, sub-contracting, home-working arrangements, fixed term contracts or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

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- 4.1. There are hiring policies, procedures and trained staff to ensure that workers are entering into employment freely and equally and that they are never prevented from leaving if they so wish.
- 4.2. Workers have freedom of movement and are not confined to the supplier's premises, including dormitories or provided housing.
- 4.3. Workers are not required to surrender their identification papers.
- 4.4. Workers should not be required to pay a fee in connection with obtaining employment (including migrant workers or recruited workers supplied through an agency). Suppliers must be responsible for payment of all fees and expenses. Workers are not required to pay deposits in relation to their employment.
 - 4.4.1. **Good practice looks like** to every extent possible workers are hired directly and transparently.
 - 4.4.2. **Good practice looks like** having effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract, agency, temporary or casual labour.

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- 4.4.3. **Good practice looks like** recruiting permanent employees from any workers who are, or who have, worked on site on a non-permanent contract.
- 4.4.4. **Good practice looks like** the recruitment of migrants includes full transparency about terms, conditions and any employment costs, and the migrants are informed about the labour laws applicable in the place of work prior to commencement of employment in their spoken language.
- 4.4.5. **Good practice looks like** if labour hire providers are used to supply workers, suppliers understand their policies and procedures regarding recruitment and know that they are not using forced or trafficked labour. Suppliers are also able to verify that workers do not pay fees to secure employment contracts.
- 4.5. The key components of the employer/worker relationship such as hours, overtime, pay, benefits, leave, disciplinary and grievance systems are: (i) freely agreed by both parties; (ii) documented in writing; and (iii) signed by the employer and worker. Changes are agreed in writing by both employer and worker. Workers are provided a copy of their employment contract signed by both employer and worker.
- 4.6. Suppliers shall ensure that the terms and conditions of employment contracts are in a language understood by the worker and are explained (verbally if required).
- 4.6.1. **Good practice looks like** key management functions such as hiring, grievances, discipline, promotion and termination have clear policy frameworks, procedures for implementation and trained staff responsible for implementing them. Appropriate documentation is kept. These policies and procedures are explained to workers upon hiring and contained in a workers' manual, and workers are trained to understand and use them.
- 4.6.2. **Best practice extends further** whereby there is a clear and transparent system of worker and management communication that enables workers, including temporary workers, to consult and have an effective dialogue with management.
- 4.7. All employment contracts are stored securely.
- 4.8. All work is compensated according to at least the legal minimum standards or the appropriate prevailing industry standards, whichever is the higher.
- 4.8.1. **Good practice looks like** all non-permanent workers are paid above the legal minimum standards.
- 4.9. Workers receive a payslip for each pay period, clearly indicating the components of the compensation, including exact amounts for wages, benefits, incentives/bonuses and any deductions.
- 4.9.1. **Good practice looks like** all workers should receive a physical or electronic payslip. The payslip should detail all elements of compensation including hours worked, benefits received, and deductions made. Suppliers ensure that all deductions are understood and agreed to by the worker.
- 4.10. Wages are paid on time and in full.
- 4.11. Responsible managers are experienced and/or trained on the core principles of responsible recruitment practices.

5. Workers' health, safety and wellbeing are safeguarded at work

Relevant Coles Ethical Sourcing Policy Requirements:

Safe Working Conditions

- Suppliers will provide plant and systems of work that are safe and without risk to health.
- Suppliers will provide workers with a safe and clean working environment taking into consideration the prevailing knowledge of the industry and of any specific hazards.
- Workers must receive adequate training to perform their jobs in a safe manner, and training shall be recorded.
- Where required to perform their duties, personal protective equipment (PPE) must be supplied to workers by the suppliers, and workers shall be trained in its use.
- Safeguards on machinery must meet or exceed local laws.
- Where suppliers provide worker accommodation, it must be clean, safe and at a minimum, meet the basic needs of workers.

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- Workers shall have access to clean toilet facilities, clean drinking water and where appropriate, sanitary facilities for food storage and preparation.
- Suppliers shall assign responsibility for health and safety to a senior management representative.
- Suppliers shall ensure that all health and safety procedures comply with applicable national and local laws.

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- 5.1. Clear and effective policies and procedures are in place for occupational health and safety, and are updated periodically.
 - 5.1.1. **Good practice looks like** occupational health and safety policies and procedures are included in the workers' manual and communicated prior to work commencing.
 - 5.1.2. **Best practice extends further** to include a documented procedure to monitor and measure the effectiveness of the occupational health and safety policies, guidelines, policies and/or training.
- 5.2. Occupational health and safety policies and procedures are widely communicated.
 - 5.2.1. **Good practice looks like** occupational health and safety committees are created and their roles are clearly understood by all workers and managers. Organisational management should play an active role in supporting workplace health, safety and wellbeing, and encourage workers to report any hazards immediately so that risks can be managed before an incident occurs.
- 5.3. Ongoing safety training is provided to all personnel, including managers, supervisors, workers and security guards.
 - 5.3.1. **Good practice looks like** work health and safety training is ongoing to reduce the risk of incidents and keep all staff up to date with processes, including new staff to the site and staff returning to work after a long absence.
 - 5.3.2. **Good practice looks like** fire drills and emergency evacuation procedures are tested prior to peak periods / seasons, and at a minimum are tested annually.
- 5.4. All workers and other people who enter business premises are properly informed about the inherent dangers of the workplace and are provided with adequate knowledge and personal protective equipment (**PPE**) to avoid such dangers. The worker shall not be charged for the cost of PPE, including deductions from workers' wage for work related items such as PPE.
 - 5.4.1. **Good practice looks like** PPE works best when you use it to supplement higher-level control measures or when no other safety measures are available. Before relying on PPE, a supplier will perform a risk assessment to see what other controls can and should be used.
 - 5.4.2. **Good practice looks like** PPE is selected on the basis that it is suitable for the nature of the work or hazard, is a suitable size and fit for the individual who is required to use it, and is reasonably comfortable. PPE is maintained, repaired or replaced, which includes ensuring the equipment is clean and hygienic, and in good working order.
 - 5.4.3. **Good practice looks like** providing the worker with information, training and instruction in the proper use and wearing of PPE, including its storage and maintenance.
- 5.5. All personnel who enter the premises or deal with products are properly informed about the appropriate actions to take should a health and safety incident occur.
 - 5.5.1. **Good practice looks like** in low-risk workplaces (an office) a first aid room is provided when there are more than 200 workers; and in high-risk workplaces (agriculture) a first aid room is available when there are more than 100 workers.
 - 5.5.2. **Good practice looks like** one first aider is available for every 50 workers in low-risk workplaces (an office); for high-risk sites (agriculture) one first aider is available for every 25 workers. A trained first aider will need to hold statement of attainment or training from a registered third-party training organisation.
 - 5.5.3. **Good practice looks like** first aid kits are made available close to areas where there is a higher risk of injury or illness, as well as inside work vehicles if workers are expected to travel as part of their job.
- 5.6. Risk assessments are conducted regularly, and systems are updated to reflect the changing risk profile of the workplace (refer to Coles' Ethical Sourcing - Safety Instruction and Training Checklist for more information).
 - 5.6.1. **Good practice looks like:**

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- 5.6.1.1. *Identifying hazards*: finding out what could cause harm;
- 5.6.1.2. *Assessing risks*: understanding the nature of the harm that could be caused by the hazard, how serious the harm could be and the likelihood of it happening;
- 5.6.1.3. *Controlling risks*: eliminating or implementing the most effective control measure that is reasonably practicable; and
- 5.6.1.4. *Reviewing control measures*: ensuring control measures are working as planned.

6. All workers are free to exercise their right to form and/or join trade unions, or to refrain from doing so, and to bargain collectively

Coles' Ethical Sourcing Policy Requirements

Freedom of Association and Collective Bargaining

- Suppliers acknowledge that workers have a right to freedom of association and to bargain collectively.
- Workers have a right to join or form trade unions of their choosing. Suppliers must not prevent or disrupt the activities of trade unions and their organisation activities. No workers shall be subjected to harassment, intimidation or retaliation for exercising their right to freedom of association and collective bargaining. Workers' representatives should have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining are restricted under local laws, suppliers will not hinder the development of alternative means of independent and free association and bargaining.

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- 6.1. Clear policies, procedures and training of workers and managers to ensure freedom of association in day-to-day operations are in place.
 - 6.1.1. **Good practice looks like** policies covering hiring, discipline, promotion, wages, hours, grievances and termination all clarify that a worker's choice to form or join a trade union will not compromise their equal treatment at work.
- 6.2. Managers, supervisors and security guards are trained to respect each worker's right to associate freely.
 - 6.2.1. **Good practice looks like** clear rules governing the activities of recognised trade unions in the workplace are in place.
- 6.3. Collective bargaining negotiations are entered into when requested by legally recognised representative agents.
- 6.4. Workers know and understand their rights to freedom of association and collective bargaining and feel confident to exercise them, and no other workers or managers shall impede them in the enjoyment of those rights.
 - 6.4.1. **Good practice looks like** an ongoing social dialogue on all aspects of work is established between workers and employers.

7. Reasonable hours of work and overtime

Relevant Coles Ethical Sourcing Policy Requirements:

Working Hours

- Including any overtime, workers must not work above the maximum hours per week or per month as stipulated by local laws, or where local laws do not exist, a total of 60 hours per week. Exceptions may be considered if:
 - a) permitted by national law or Collective Bargaining Agreement (CBA);
 - b) appropriate safety measures are implemented to protect workers; or
 - c) Suppliers can demonstrate and prove exceptional circumstances (e.g. unanticipated and unavoidable production peaks, accidents, or emergencies)

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- Workers must have at least one day off in 7 days or two days off in every 14 days.
- Workers must be provided with legally required breaks during their working day.
- Overtime must be voluntary and compensated as prescribed by local laws, or where local laws do not exist, overtime should be compensated in line with ETI Base Code.
- Accurate and complete records of hours worked by each worker must be maintained.

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- 7.1. Clear policies are implemented regarding regular and overtime hours of work, with defined procedures for deciding on overtime and securing worker consent.
- 7.2. In the absence of law, the supplier will implement steps over time to meet the goals and requirements set out in the International Labour Organization Convention on hours of work and overtime so that the regular working week does not exceed 48 hours and other than in exceptional circumstances, the sum of regular and overtime hours in a week does not exceed 60 hours. Where the sum of regular and overtime hours in a week exceeds 60 hours under normal conditions, a plan to implement a sustainable reduction toward this goal must be in place.
 - 7.2.1. **Good practice looks like** peak periods are planned in such a way as to avoid excessive overtime. Overtime is not used for extended periods as a means of making up for labour shortages or increased order volumes.
 - 7.2.2. **Good practice looks like** if enough workers cannot be hired, new working time arrangements are explored to ensure that overtime is the exception rather than the rule.
- 7.3. Workers are entitled to at least 24 consecutive hours of rest in every seven-day period. If workers are required to work on a rest day due to a genuine need for continuity of production or service, workers must receive an equivalent period of compensatory rest immediately following.
 - 7.3.1. **Good practice looks like** anticipating possible issues that would result in overtime, such as machine downtime, late supplier deliveries, change to customer orders, absent workers and increases in volume. For each issue, have a plan to minimise overtime.
- 7.4. If the employment contract allows for contractual overtime, workers expressly agree to it. All overtime work by workers is on a voluntary basis.
- 7.5. Suppliers will monitor the health and wellbeing of workers who are working overtime, with a focus on worker fatigue.
 - 7.5.1. **Good practice looks like** consulting with workers, including managers, supervisors and health and safety representatives (if any) about the impact of workloads and work schedules, including work-related travel and work outside of normal hours.
 - 7.5.2. **Best practice extends further** to include suppliers getting advice and information on fatigue from relevant experts, research, guidance materials and data published by regulators, industry associations, unions or other sources.
- 7.6. All overtime work is paid at least to the rate defined by law.
 - 7.6.1. **Good practice looks like** all overtime work is paid at the appropriate premium rate according to law or to prevailing industry standards, whichever is the higher, and there is an effective mechanism to monitor hours of work.

8. Workers are provided with mechanisms to raise concerns and complaints confidentially

Coles' Ethical Sourcing Policy Requirements

Grievance Mechanisms and Remediation

- Suppliers are to provide appropriate channels for worker and community grievances, and these channels are to be effectively communicated (for example, in spoken languages, in physical and electronic forms). These channels will be communicated in addition to building capacity and awareness around social and labour practices. The effectiveness of these channels will be assessed using stakeholder feedback.

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- Worker grievances are to be heard, appropriately investigated, and any required remediation taken in a timely manner. Complainants are to be informed throughout the process and informed of their options for escalation.
- Channels must be provided through which adversely affected people or communities, including workers, can raise complaints or concerns without fear of retaliation, intimidation, harassment, discrimination, or victimisation.
- Suppliers must not obstruct access to other remedies, including judicial or non-judicial remedies. Suppliers will also support the work of and will be open to working with the Australian National Contact Point (AUSNCP).
- An anonymous, confidential method for all workers to raise concerns to the supplier without fear of retaliation shall be provided.
- Coles respects the rights of human rights defenders, and does not tolerate threats, intimidation, or attacks against human rights defenders.

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- 8.1. There is a policy which expresses the supplier's commitment to respect human rights, which has been communicated to the relevant stakeholders including workers, and suppliers, and is publicly available.
- 8.2. Workers are aware of the grievance mechanisms and procedures available to them
- 8.3. The supplier records in a confidential manner details of grievances and their outcomes.
- 8.4. The supplier monitors the effectiveness of their grievance mechanisms on a regular basis.
- 8.5. There is a designated person with the responsibility for managing the supplier's human rights impacts, including grievances and concerns.
- 8.6. The supplier has developed an action plan relating to what the business will do to address any negative impacts identified.
 - 8.6.1. **Good practice looks like** the supplier identifying the stakeholders impacted by their business activities and assessing any human rights issues.
 - 8.6.2. **Good practice looks like** ensuring all managers and supervisors are trained to have the skills to listen and communicate on grievances with workers.
 - 8.6.3. **Good practice looks like** having processes in place to ensure that human rights issues are managed and eliminated or minimised.
- 8.7. There is clear communication or training within the supplier's business on how to deal with human rights issues including how concerns should be communicated and dealt with.
 - 8.7.1. **Good practice looks like** the supplier communicating human rights impacts of the business across relevant internal functions by conducting regular training sessions.
- 8.8. The supplier demonstrates and implements data privacy procedures for workers' information.

9. Queries and feedback

For any queries or to provide feedback regarding continuous improvement guidance, please contact the Coles Ethical Sourcing Team at EthicalSourcing@coles.com.au.