



Ethical Sourcing

Policy, Supplier Requirements
and Tools

Ethical Sourcing

Contents

Contents:

Charter	
03. Responsible Sourcing Charter Outline	3
Policy	
03.02. Ethical Sourcing Policy	4
Requirements	
03.02.01. Coles Ethical Sourcing Supplier Requirements	7
03.02.02. Approved Ethical Audit Formats	12
03.02.03. Supplier Approval and Management Using Sedex	13
03.02.04. Wages and Benefits Redemption Supplier Requirements (Australia)	32
03.02.05. Child Labour Remediation Supplier Requirements	36
03.02.06. Forced and Bonded Labour Remediated Supplier Requirements	38
Tools	
03.02.01.01. Safety Instructions and Training Checklist	43
03.02.01.02. Sedex Self-Assessment Questionnaire Guidance	47
03.02.01.03. Worker Accommodation Guidelines	50
03.02.01.04. Worker Health and Safety Action Plan	53
03.02.01.05. Cherry Pickers Hazard List	56
03.02.01.06. Continuous Improvement Supplier Guide	60
03.02.01.07. Packing Shed Hazard Checklist	68
03.02.01.08. Ethical Trade Initiative (ETI) Base Code	76
03.02.01.09. Third-Party Labour Providers Supplier Guidance	80
03.02.01.10. Sedex On-Boarding Guide	86

Responsible Sourcing

Charter Outline

In order to deliver trusted value every day to our customers, Coles cares about where our products come from, and we work with our suppliers and industry experts to adopt responsible practices that look after people, animals and the environment. We will work towards meeting the following policy commitments:

1. Australia First Sourcing – Country of Origin

- Coles will always try to source from Australian suppliers and farmers first where they support us delivering trusted, value every day for our customers.

2. Ethical Sourcing

- Coles will source products in an ethical and responsible manner, giving consideration to worker welfare, health and safety and environmental impacts.

3. Animal Welfare

- Coles will source meat and animal products from farming operations which have a standard of animal welfare that meets our high expectations, and where appropriate, hold animal welfare certification.
- Coles Own Brand products will not be tested on animals.

4. Responsible Agriculture

- Coles will work with our fresh produce, meat, egg and dairy suppliers to support and encourage best practice in agriculture, minimising environmental impacts and maximising sustainability and resilience in our agricultural supply chains.

5. Responsibly Sourced Seafood

- Coles Own Brand and Deli seafood will be responsibly sourced from well-managed fisheries and aquaculture farms that have been independently assessed for their impact on the environment, along with how and where the seafood is caught, to help maintain healthy fish populations and habitats.

6. Sustainably and Ethically Certified Commodities

- We will use sustainable and ethical certification programs when sourcing commodities that present high environmental and ethical risks for Coles Own Brand, Coles Express and Liquor products. These commodities include cocoa, tea, coffee, timber, paper, sugar and palm oil.

7. Sustainable Packaging

- We will work with our suppliers to ensure that all Coles Own Brand products are packaged in recyclable, biodegradable or reusable packaging, and that all transport packaging is minimised, and reusable and/or recyclable. We will clearly label packaging to inform our customers on sustainable disposal or recycling methods.
- We will provide packaging recycling systems in store for customers to recycle film plastic packaging materials not currently collected via household kerbside systems.

8. Product Stewardship

- We will consider the impacts of our products beyond the checkout, and work with suppliers and customers on the responsible stewardship of products at their end of useful life.

Ethical Sourcing Policy

03 Charter

02 Policy

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions and establishes the minimum standards when supplying Coles. It is the supplier's responsibility to achieve and maintain these standards and to enforce them within those parts of their supply chains involved in supplying Coles (e.g. raw materials suppliers, processing facilities, factories, warehouses). As our business relationship develops we expect our suppliers to raise their standards and continually improve working conditions.

1. Policy Requirements

- 1.1. All suppliers are required to agree to the principles in the Coles Ethical Sourcing Policy and as set out in their Trading Agreement with Coles.
- 1.2. If suppliers are unable to demonstrate compliance with the Coles Ethical Sourcing Policy, Coles reserves the right to terminate the Trading Agreement.
- 1.3. Coles utilises the Supplier Ethical Data Exchange (Sedex) online portal for the secure exchange of ethical data with our Suppliers. Suppliers must complete an annual self-assessment questionnaire (SAQ) and Coles may, at its discretion, require an independent audit, at the supplier's expense, of compliance with this policy

2. Legal Requirements

- 2.1. 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 this Ethical Sourcing Policy.

3. Forced/ Bonded Labour

- 3.1. Suppliers must not use Forced, Bonded or Involuntary Labour.
- 3.2. Employment must be freely chosen.
- 3.3. Workers must not be required to lodge deposits or identity papers with suppliers.
- 3.4. Workers must be free to leave their employment after reasonable notice, not more than 1 month, has been given.

4. Child Labour

- 4.1. 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, or that is harmful to their physical and mental development.
- 4.2. 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), where the minimum age for work is defined as being below the age for finishing compulsory schooling, and in any case not less than 15 years of age.

5. Illegal Labour

- 5.1. Suppliers must not use Illegal Labour.
- 5.2. Suppliers must be able to verify the legal entitlement of their employees to work in the country of employment.

6. Harsh or Inhumane Treatment

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

7. Business Integrity

- 7.1. Suppliers must engage professional business ethics in all dealings and provide transparent documentation and records.
- 7.2. Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise.

Ethical Sourcing Policy

8. Wages and Benefits

- 8.1. Wages and benefits paid for a standard working week must meet as a minimum 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.
- 8.2. 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 that are paid.
- 8.3. Deductions from wages may only occur with the express written permission of the worker concerned.
- 8.4. Deductions from wages for disciplinary measures are not permitted.

9. Working Hours

- 9.1. 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.
- 9.2. Workers must have at least one day off in 7 days or two days off in every 14 days.
- 9.3. Overtime must be voluntary and compensated as prescribed by local laws.
- 9.4. Record keeping on hours worked must be accurate, complete and transparent at all times.

10. Freedom of Association

- 10.1. Suppliers acknowledge that workers have a right to freedom of association and to bargain collectively.
- 10.2. Workers have a right to join or form trade unions of their choosing. Suppliers are required to adopt an open attitude towards the activities of trade unions and their organisation activities.
- 10.3. 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.

11. Sub-Contracting and Supply Chain

- 11.1. There must be no sub-contracting unless documented and available for review by Coles or an independent auditor, including but not limited to records of subcontractors' names and locations. Coles considers sub-contracting to mean:
 - i) Sites contracted by Coles' direct suppliers to produce product in its final form for retail sale, packed in the retail unit, or produced in bulk in final form for retail packing elsewhere, or received in bulk final form for retail packing.
 - ii) Sites that significantly contribute to the final form of the product.
- 11.2. Suppliers must have adequate policies and processes in place for properly managing subcontracting, to ensure that sub-contractors operate in accordance with applicable laws, regulations and the Coles Ethical Sourcing Policy.

12. Safe Working Conditions

- 12.1. Plant and systems of work which are safe and without risk to health will be provided.
- 12.2. 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.
- 12.3. Workers must receive adequate, recorded training to perform their jobs in a safe manner.
- 12.4. Personal protective equipment must be supplied and workers trained in its use.
- 12.5. Safeguards on machinery must meet or exceed local laws.
- 12.6. Where suppliers provide worker accommodation, it must be clean, safe and meet the basic needs of workers.
- 12.7. Workers must have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.

Ethical Sourcing Policy

13. Discrimination

- 13.1. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

14. Regular Employment

- 14.1. To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 14.2. Employees who have a regular employment relationship with their employer are afforded a number of 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.

15. Environment

- 15.1. Suppliers must comply with local and national environmental laws and regulations.
- 15.2. Suppliers must use reasonable endeavors to comply with international standards on environmental protection.

16. Documentation and Policies

- 16.1. Appropriate documentation is in place to ensure effective ethical management practices.
- 16.2. Appropriate policies are developed to ensure effective management of ethical issues.

Ethical Sourcing

Supplier Requirements

03 Charter

02 Policy

01 Requirement

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions and establishes the minimum standards when supplying Coles. It is the supplier's responsibility to achieve and maintain these standards and to enforce them within those parts of their supply chains involved in supplying Coles (e.g. raw materials suppliers, processing facilities, factories, warehouses). As our business relationship develops we expect our suppliers to raise their standards and continually improve working conditions.

Summary of Supplier Requirements and Site Approval

The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions. Coles Ethical Sourcing Supplier Requirements outline the specific requirements for Coles Suppliers in regard to worker welfare, health and safety and environmental impact.

All suppliers are required to agree to the principles outlined in the Coles Ethical Sourcing Policy as outlined in their Trading Agreement with Coles. If suppliers are unable to demonstrate a commitment to comply with the Coles Ethical Sourcing Policy, Coles reserves the right to terminate the Trading Agreement.

Coles utilises the Sedex online portal for the secure exchange of ethical data with our Suppliers. The following table summarises the Coles Ethical Sourcing Supplier approval process:

Supplier Sedex Site Risk Rating	Audit Required?	Non-Conformance Close-out Requirements	Coles Approval	Sedex Self-Assessment Updates
High risk	Yes	Critical and Major non-conformances closed out and approved by Auditor	Outstanding Critical Non-conformances = Not Approved Outstanding Major Non-conformances = Conditionally Approved for 4 months Auditor evidence non-conformances closed out = Approved for 12 months	Annual
Medium risk	Yes	Critical and Major non-conformances closed out and approved by Auditor	Outstanding Critical Non-conformances = Not Approved Outstanding Major Non-conformances = Conditionally Approved for 4 months Auditor evidence non-conformances closed out = Approved for 24 months	Annual
Low Risk	No	Not Applicable	Approved for 24 months	Annual

Ethical Sourcing

Supplier Requirements

Supplier Requirements

1. Policy Requirements

- 1.1. All suppliers are required to agree to the principles in the Coles Ethical Sourcing Policy and as set out in their Trading Agreement with Coles.
- 1.2. If suppliers are unable to demonstrate compliance with the Coles Ethical Sourcing Policy, Coles reserves the right to terminate the Trading Agreement.
- 1.3. Suppliers must complete an annual self-assessment and Coles may, at its discretion, require an independent audit, at the supplier's expense, of compliance with this policy.
- 1.3. Coles categorises elements of the Ethical Sourcing Supplier Requirements as either: Critical, Major or Minor.

2. Legal Requirements

- 2.1. 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 this Ethical Sourcing Policy.

3. Forced/ Bonded Labour (Critical)

- 3.1. Suppliers must not use Forced, Bonded or Involuntary Labour.
- 3.2. Employment must be freely chosen.
- 3.3. Workers must not be required to lodge deposits or identity papers with suppliers.
- 3.4. Workers must be free to leave their employment after reasonable notice, not more than 1 month, has been given.

4. Child Labour (Critical)

- 4.1. 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.
- 4.2. 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), where the minimum age for work is defined as being below the age for finishing compulsory schooling, and in any case not less than 15 years of age.

5. Illegal Labour (Critical)

- 5.1. Suppliers must not use Illegal Labour.
- 5.2. Suppliers must be able to verify the legal entitlement of their employees to work in the country of employment.

6. Harsh or Inhumane Treatment (Critical)

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

7. Business Integrity (Critical)

- 7.1. Suppliers must engage professional business ethics in all dealings and provide transparent documentation and records.
- 7.2. Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise.

Ethical Sourcing

Supplier Requirements

8. Wages and Benefits (Major)

- 8.1. Wages and benefits paid for a standard working week must meet as a minimum 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.
- 8.2. 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 that are paid.
- 8.3. Deductions from wages may only occur with the express written permission of the worker concerned.
- 8.4. Deductions from wages for disciplinary measures are not permitted.

9. Working Hours (Major/Minor)

- 9.1. 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. (In excess of 75 hours per week is considered a Major non-conformance; between 60 and 75 hours per week is considered a Minor non-conformance).
- 9.2. Workers must have at least one day off in 7 days or two days off in every 14 days (Major non-conformance).
- 9.3. Overtime must be voluntary and compensated as prescribed by local laws (Major non-conformance).
- 9.4. Record keeping on hours worked must be accurate, complete and transparent at all times (Major non-conformance).

10. Freedom of Association (Major)

- 10.1. Suppliers acknowledge that workers have a right to freedom of association and to bargain collectively.
- 10.2. Workers have a right to join or form trade unions of their choosing. Suppliers are required to adopt an open attitude towards the activities of trade unions and their organisation activities.
- 10.3. 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.

11. Sub-Contracting and Indirect Suppliers (Major)

- 11.1. There must be no sub-contracting unless documented and available for review by Coles or an independent auditor, including but not limited to records of subcontractors' names and locations. Coles considers sub-contracting and indirect suppliers to mean:
 - i) Sites contracted by Coles' direct suppliers to produce product in its final form for retail sale, packed in the retail unit, or produced in bulk in final form for retail packing elsewhere, or received in bulk final form for retail packing.
 - ii) Sites that significantly contribute to the final form of the product. Examples of processes considered to significantly contribute to the final form of the product include (but are not limited to):
 - Embellishing, pressing, fabric finishing;
 - Partial garment cut and trim;
 - Peeling, trimming, husking, de-hulling, filleting;
 - Harvesting of fresh fruit, vegetables or seafood;
 - Grow produce for retail sale;
 - Pack produce for retail sale;
 - Operate as an aggregator, distributor, broker or agent supplying produce for retail sale; and
 - A direct supplier, a subcontract supplier or a co-packer.

Ethical Sourcing

Supplier Requirements

- 11.2. Suppliers must have adequate policies and processes in place for properly managing subcontracting, to ensure that sub-contractors operate in accordance with applicable laws, regulations and the Coles Ethical Sourcing Policy.
- 11.3. Direct Coles supplies must ensure that sub-contracted and indirect supplier sites are registered and connected via the direct supplier to Coles on Sedex, and visibility of the site details and ethical information made available to Coles.
- 11.4. If sub-contracted or in-direct supplier sites are rated Medium or High Risk, Coles reserves the right to request Audits from these sites and apply the Coles supplier site assessment and approval process.

12. Safe Working Conditions (Major)

- 12.1. Plant and systems of work which are safe and without risk to health will be provided.
- 12.2. 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.
- 12.3. Workers must receive adequate, recorded training to perform their jobs in a safe manner.
- 12.4. Personal protective equipment must be supplied and workers trained in its use.
- 12.5. Safeguards on machinery must meet or exceed local laws.
- 12.6. Where suppliers provide worker accommodation, it must be clean, safe and meet the basic needs of workers.
- 12.7. Workers must have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.

13. Discrimination (Minor)

- 13.1. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

14. Regular Employment (Minor)

- 14.1. To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 14.2. Employees who have a regular employment relationship with their employer are afforded a number of 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.

15. Environment (Minor)

- 15.1. Suppliers must comply with local and national environmental laws and regulations.
- 15.2. Suppliers must use reasonable endeavours to comply with international standards on environmental protection.

16. Documentation and Policies (Minor)

- 16.1. Appropriate documentation is in place to ensure effective ethical management practices.
- 16.2. Appropriate policies are developed to ensure effective management of ethical issues.

17. Risk and Audit Assessment

- 17.1. Coles requires all suppliers to register as a Supplier (B Membership) on Sedex Global and complete an annual online self-assessment.

Ethical Sourcing

Supplier Requirements

- 17.2. Supplier sites classified as high or medium risk under the Sedex risk rating system are required to provide and upload an independent ethical audit by an approved audit provider.
- 17.3. Coles, at its discretion may require an independent ethical audit for any of its suppliers, regardless of country of origin or industry sector.

18. Audit Assessment

- 18.1 Ethical Audits must be kept current and audit frequency is dependent on audit outcomes.
- 18.2. Upon receipt of the Ethical Sourcing Audit, and Auditor approved non-conformance rectification, Coles will determine whether a supplier is Approved or Not Approved based on the Risk and Audit Assessment criteria in Table 1.

Table 1: Coles Ethical Sourcing Supplier Approval Process

Supplier Sedex Site Risk Rating	Audit Required?	Non-Conformance Close-out Requirements	Coles Approval	Sedex Self-Assessment Updates
High risk	Yes	Critical and Major non-conformances closed out and approved by Auditor	Outstanding Critical Non-conformances = Not Approved Outstanding Major Non-conformances = Conditionally Approved for 4 months Auditor evidence non-conformances closed out = Approved for 12 months	Annual
Medium risk	Yes	Critical and Major non-conformances closed out and approved by Auditor	Outstanding Critical Non-conformances = Not Approved Outstanding Major Non-conformances = Conditionally Approved for 4 months Auditor evidence non-conformances closed out = Approved for 24 months	Annual
Low Risk	No	N/A	Approved for 24 months	Annual

19. Supplier Approval

- 18.1 Coles will determine whether a supplier is Approved or Not Approved based on the Risk and Audit Assessment criteria in Table 1.
- 18.2. Supply to Coles can only commence once the Supplier is Approved under the Ethical Sourcing Policy.
- 18.3. Supply to Coles will cease if the Supplier does not comply with these Ethical Sourcing Supplier Requirements and is classified by Coles as Not Approved.

Ethical Sourcing

Approved Ethical Audit Formats

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions and establishes the minimum standards when supplying Coles. It is the supplier's responsibility to achieve and maintain these standards and to enforce them within those parts of their supply chains involved in supplying Coles (e.g. raw materials suppliers, processing facilities, factories, warehouses). As our business relationship develops we expect our suppliers to raise their standards and continually improve working conditions.

Approved Audit Formats for Mutually Recognised Ethical Audits

Coles may accept the following ethical audit formats as aligning with our Ethical Sourcing Policy. Audits must be carried out by Third Party Auditors certified to ISO 9001:2015 by an independent accreditation body, or are approved by the relevant audit format owner to undertake these audit formats. At the discretion of the Coles Ethical Sourcing team, additional audit formats may also be recognised.

- **SEDEX (SMETA) – Coles preferred audit format.**
- Better Work Program Audit (International Labour Organisation)
- Disney
- BSCI (Business Social Compliance Initiative)
- EICC (Electronics Industry Citizenship Coalition)
- ETI (Ethical Trading Initiative)
- FLA (Fair Labour Association)
- ICS (Initiative Clause Sociale)
- ICTI (International Council of Toy Industries)
- Kmart Australia
- Macy's Inc
- McDonalds
- SA8000
- Target Australia
- Wal-Mart
- Woolworths Ltd (Australia)
- WRAP (Worldwide Responsible Apparel Production)

Ethical Sourcing

Supplier Approval & Management Using Sedex

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions and establishes the minimum standards when supplying Coles. It is the supplier's responsibility to achieve and maintain these standards and to enforce them within those parts of their supply chains involved in supplying Coles (e.g. raw materials suppliers, processing facilities, factories, warehouses). As our business relationship develops we expect our suppliers to raise their standards and continually improve working conditions.

Introduction

Coles is utilising the Sedex online portal to manage our Supplier ethical data and approval process. Coles requires all suppliers of Coles Own Brands, fresh produce, meat, Coles Express Own Brand products, Liquor Own Brand products, services and goods not for resale to become a 'B' member of Sedex and adhere with the approval processes outlined in this document.

What is Sedex?

- Membership organisation offering an online database which allows members to upload, share, manage and report on ethical information such as labour standards and health and safety policies within their own company and supply chain.
- Simple and effective way to view and monitor supplier's data, so customers know where their products are coming from and if their suppliers practise local and international working standards.
- Sedex is positively influencing the lives of over 24 Million workers in more than 150 countries.

Benefits of Supplier 'B' Membership:

- Lower admin burden and reduce the loss of production time.
- Reduce reputational risk.
- Membership cost for a production site is £40.32 for a year (as at April 2016).
- Helps reduce the number of ethical audits as members can share information with multiple customers. To find out which of your customers are Sedex members, see <http://www.sedexglobal.com/about-sedex/buyers-and-suppliers/list-of-members/>
- Efficient and cost effective way of sharing ethical information with multiple customers.

Ethical Sourcing

Supplier Approval & Management Using Sedex

1 Sedex and Coles Fusion Requirements

- 1.1. Suppliers must register on Sedex via <https://sedexadvance.sedexonline.com/sso/#/register>. Most Supply Partners will be able to register as 'Supplier (B Membership)' at a cost of approximately AU\$80/year.
- 1.2. Suppliers must enter the information for each site supplying to Coles. Sedex will allocate a company Sedex reference number and a reference number for each site. These references numbers need to be recorded in Coles Fusion by the supplier.
- 1.3. Suppliers must annually complete the Sedex self-assessment questionnaire (SAQ) for each site supplying to Coles.
- 1.4. Once registered, suppliers must either send Coles a relationship initiation request by searching for Coles (Coles Supermarkets), or the **Coles Sedex reference number of ZC3775515**, in the Buyer AB Membership search.
- 1.5. Suppliers must allow Coles to view sites, contacts, SAQ and audits for all sites that supply to Coles. The Site(s) Visibility on Sedex should look as follows:

Site(s) Visibility	SITE NAME	DETAILS	CONTACTS	SAQ	AUDITS	REFERENCE
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

- 1.6. Coles will accept the relationship request.
- 1.7. Once the site SAQ has been completed, Sedex will allocate a site risk level (Low, Medium, High). Coles will record this on Coles Fusion.
- 1.8. If the site risk level is Medium or High, Coles will raise an ethical audit requirement in Coles Fusion.
- 1.9. If the site risk level is Low, the site will be approved for 24 months without an ethical audit.

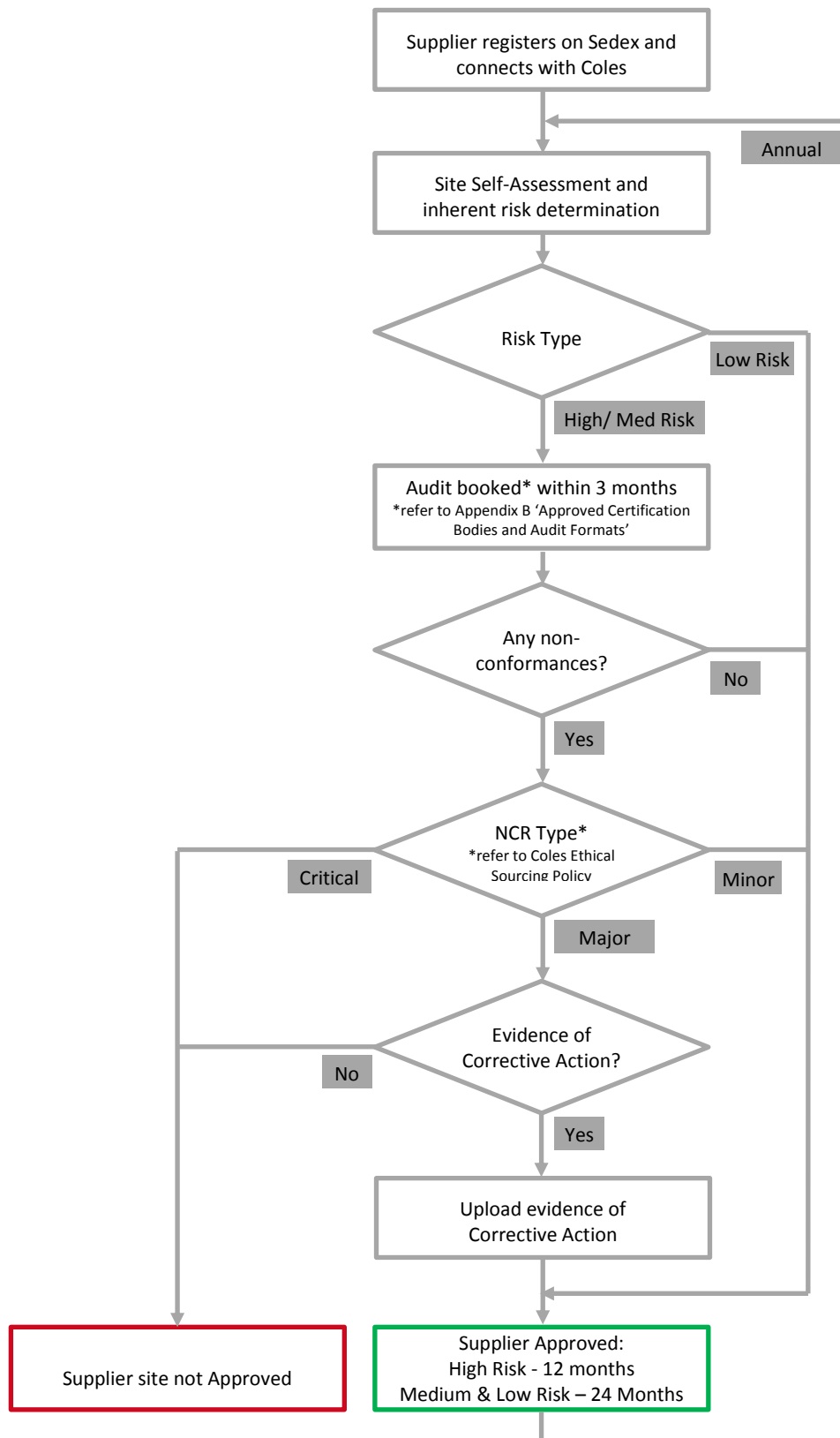
Ethical Audit Requirement and Assessment Process

- 2.1. Based on the outcome of the Sedex SAQ and resultant risk rating, certain supplier sites with a medium or high risk will be required to provide Coles with an ethical audit.
- 2.2. Audits and any non-conformances must be loaded by the auditor on to the Sedex portal.
- 2.3. All critical and major non-conformances must be closed out and be verified by the auditor, with an auditor's statement loaded onto the Sedex portal.
- 2.4. Suppliers will have 4 months to close out major non-conformances.
- 2.5. Once non-conformances are closed out, high risk sites will be Approved to supply for 12 months, and medium risk sites will be Approved to supply for 24 months.
- 2.6. Sedex SAQs must be updated annually, or the site will become High risk and require an ethical audit.

Ethical Sourcing

Supplier Approval & Management Using Sedex

Summary of Ethical Audit Requirement and Assessment Process



Ethical Sourcing

Supplier Approval & Management Using Sedex

Resources and References

Refer to the table below of useful links to additional information.

Resource	Internet site address
Coles Ethical Sourcing Policy	https://www.supplierportal.coles.com.au/csp/wps/portal/web/QualityColesBrands/CharterPolicyRequirementsTools
Coles Ethical Sourcing Supplier Requirements	https://www.supplierportal.coles.com.au/csp/wps/portal/web/QualityColesBrands/CharterPolicyRequirementsTools
Sedex - Registration	http://www.sedexglobal.com/join-sedex/
Sedex - Log-in	http://www.sedexglobal.com/login/

Appendix A: Audit Formats for Mutually Recognised Ethical Audits

Coles may accept the following ethical audit formats as aligning with our Ethical Sourcing Policy. Audits must be carried out by Third Party Auditors certified to ISO 9001 (QMA or EMS) by an independent accreditation body, or are approved by the relevant audit format owner to undertake these audit formats. At the discretion of the Coles Ethical Sourcing team, additional audit formats may also be recognised.

Approved Audit Formats for Mutually Recognised Ethical Audits:

- **SEDEX (SMETA) – Coles preferred audit format**
- Better Work (Better Factories Cambodia)
- Disney
- BSCI (Business Social Compliance Initiative)
- EICC (Electronics Industry Citizenship Coalition)
- FLA (Fair Labour Association)
- ICS (Initiative Clause Sociale)
- ICTI (International Council of Toy Industries)
- Kmart Australia
- Macy's Inc
- McDonalds
- SA8000
- Target Australia
- Wal-Mart
- Woolworths Ltd (Australia)
- WRAP (Worldwide Responsible Apparel Production)

At the discretion of the Coles Ethical Sourcing team, additional audit formats may be recognised.

Ethical Sourcing

Supplier Approval & Management Using Sedex

Suggested Contacts for Ethical Audit Certification Bodies

Where an ethical audit is required to be performed, they must be carried out by Third Party Auditors certified by an independent accreditation body, or by the relevant audit format owner to undertake the Coles approved audit formats. This list is not exhaustive but provided as an introduction to a number of certification bodies who are recognised by Coles to conduct third party audits of the approved audit formats.

- AusQual / AusMeat
- Asia Inspection
- Bureau Veritas
- Elevate
- Intertek
- Qualspec
- SGS International

Appendix B: Sedex User Guide

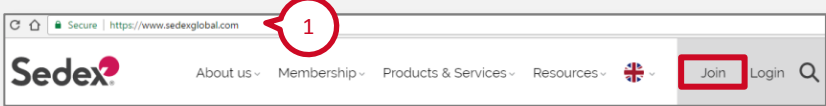
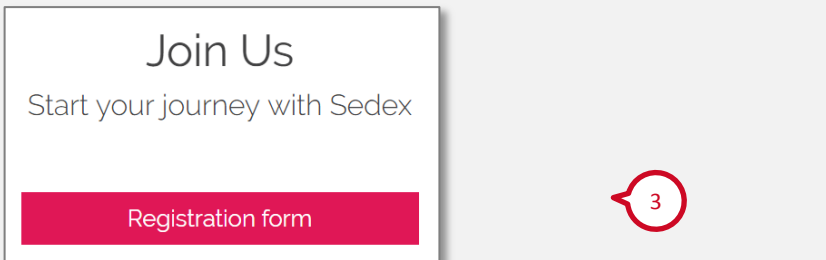
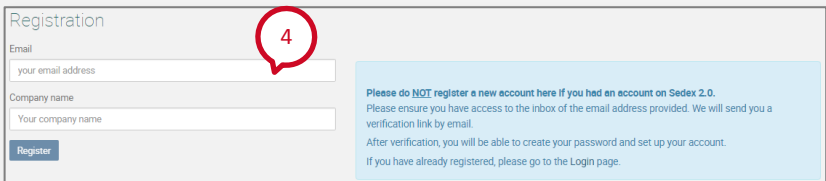
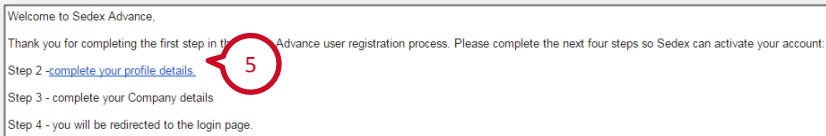
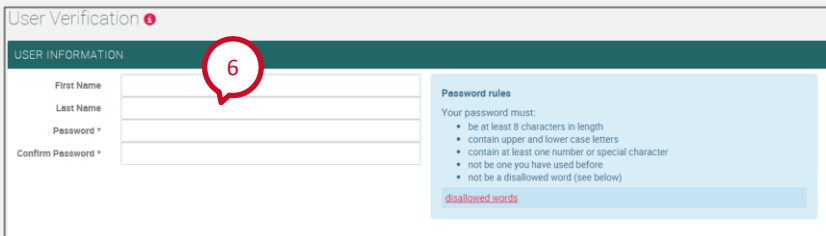
Contents

Section Guide	Page
Register Your Company on Sedex	6
Pay for your membership	7
Add Sites to an Existing Account	9
Create Site Details	9
Initiate a Customer Relationship - for Initiating a Connection with Coles	11
Accept a Relationship Request	11
Grant Coles Site Visibility	12
Multiple Sites – Global SAQ	13
Complete the Individual Site SAQ	14
Site Risk Rating	15
Upload an audit	15
Link to Indirect customer & Grant full Site Visibility	17
Link suppliers to customers	18
Sedex Helpdesk and Coles contacts	19

Ethical Sourcing

Supplier Approval & Management Using Sedex

Register your Company on Sedex

Process	On-Screen Example
<p>Use Google Chrome as your internet Browser if possible. Go to https://sedexglobal.com</p> <p>On the top right of the homepage choose a language and click on Join</p>	
<p>At the bottom of the next page opening, click on Registration form</p>	
<p>Enter your email address and company name to receive login details. Once you submit your details, you will receive an email from Sedex. This may take several days.</p>	
<p>When you receive the email, click on the link in the email to proceed. This link has an expiry of 48 hours.</p>	
<p>Your email address will become your Login ID, and you will be asked to create a password. Please record these for later reference.</p> <p>To access login page directly click on the link https://sedexadvance.sedexonline.com/ss/o/#/login</p>	

Ethical Sourcing

Supplier Approval & Management Using Sedex

Process

7. For a basic Supplier account, select Company Type Supplier (B) membership. (If you would like to use Sedex to manage your own supply chain you may want to consider an AB Membership.)
AB membership is a higher cost option.
8. Complete all the details (compulsory fields are marked with *).

9. Read and accept the Terms and Conditions;
10. Click on Finish

On-Screen Example

Pay for Your Membership

Process

1. Log in to your account via <https://sedexadvance.sedexonline.com/sso/#/login>

Go to Company > my company

2. Click on the button "Payments" on the top

On-Screen Example

Ethical Sourcing

Supplier Approval & Management Using Sedex

Process

3. Include in 'Number of sites' the total number of sites packing/manufacturing for Coles.
If you want to pay for 1 year only, enter '1' in the 'Extend Subscription' field.
4. Click "Calculate" and then "Pay Now"
5. **NOTE:** A single site payment covers your Company and one manufacturing site. Each additional site costs an extra site subscription fee.

6. You can pay online with a credit/ debit card via WorldPay or do a bank transfer (BACS)*
7. Click on "Credit/ Debit Card" to be referred to the WorldPay payments page – follow all steps on the WorldPay page

8. The status of your payment will be shown in your account
- *A 4.5% administration fee will be charged on credit or debit card payments via WorldPay.
9. *BACS payments are subject to an administration fee of 10 GBP

On-Screen Example

Payments History

SUBSCRIPTION INFORMATION

Please enter the number of sites and years you would like to pay for

4 Number of Sites * 8

Extend Subscription by * 1 year(s)

Current Expiration Date 15/02/2020

New Expiration Date

Calculated Costs

5 Calculate

5 Pay Now

Payment Details

You're about to purchase 2 year(s) of subscription for 8 site(s) of company _Sedex*Test_B Training Account which will cost you 960 GBP.

Please note payment fees:

- A 4.5% administration fee will be charged on credit or debit card payments. You will be redirected to the Worldpay website in order to make the payment. Worldpay is the secure 3rd party payment platform that we use for all card payments.
- A £10 administration fee will be charged on bank transfer payments

Please select one of the following payment options below to continue:

6 Bank transfer

7 Credit/ Debit Card

WorldPay

Help FAQs Security

Secure Payment Page

Please review your purchase details, then select a payment method to continue.

Choose currency £322.56 (Pounds Sterling)

Description 2 year(s) of subscription for 4 site(s) of company _Sedex_test_TomLegge_Supplier

Amount £322.56

Select your payment method

MasterCard Visa Amex Maestro JCB MasterPass

Your payment was successful. Thank you for your purchase!

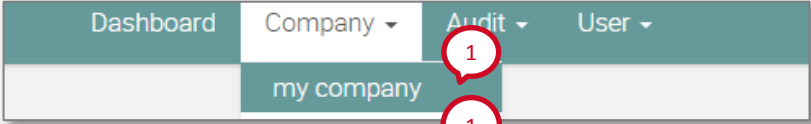
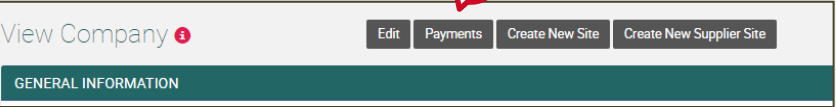
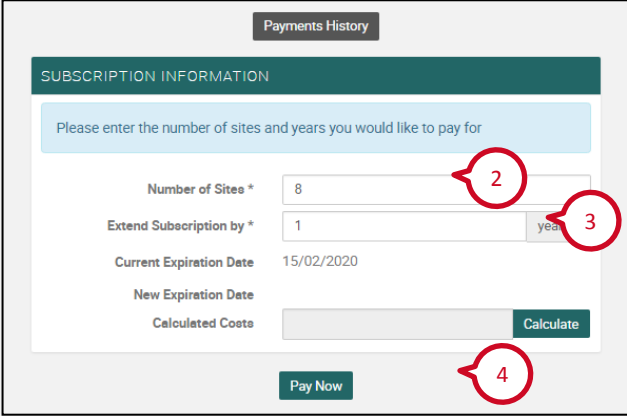
Payment Reference	Summary	Amount	Administration Fee
ZP3302186	Subscription to 20 site(s) over 2 year(s)	1612.8 GBP	0 GBP

[Your company's status has been set to active.](#)



Ethical Sourcing

Supplier Approval & Management Using Sedex

Add Sites to an Existing Account

Process	On-Screen Example
<ol style="list-style-type: none">1. Go to Company / My Company and click on Payments	 
<ol style="list-style-type: none">2. In the 'Number of Sites' field, enter the TOTAL number of sites you wish to have in your account, including new sites AND ones you have already paid for.3. If you want to pay for 1 year only, enter '1' in the 'Extend Subscription' field.4. Click "Calculate" and then "Pay Now"	

Create Site Details

Process	On-Screen Example
<ol style="list-style-type: none">1. Go to Company > my company2. Click on 'Create New Site' (Do NOT click on 'Create New Supplier Site')	 

Ethical Sourcing

Supplier Approval & Management Using Sedex

Process

3. Complete all relevant details: Fields marked with "*" are compulsory

TIP: To select multiple site functions, click on all relevant options

On-Screen Example

SITE INFORMATION

Site Name * Company Site Ltd

Address Line 1 * 33 Main Street

Address Line 2

City * St Gallen

Country * Switzerland

Post Code *

Site Functions * Service Provider, Labour P...

Administrator(s)

- Service Provider ✓
- Labour Provider ✓
- Primary Producer (Agriculture) ✓

4. Choose your product areas – type in the product and click on "Search"

Product Area(s) * Plums

Search

5. Select your product(s) by ticking the relevant boxes from the drop down menu.

Product Area(s) * Plums

Search

- Food Beverage and Tobacco Products
 - Canned or jarred fruit
 - ☐ Canned or jarred plums
 - ☐ Canned or jarred organic fruit
 - Canned or jarred organic fruit
 - ☐ Canned or jarred organic plums

6. Answer the survey questions and choose the worker types from the drop down menu – click on "Add New Worker Type" to add multiple types

7. Click on "Submit" to create the site in your account.

8. Repeat steps 1 to 7 for each site in your account

TIP: To select multiple types of products, simply type in the new product name, click on "Search" again and select from the new drop down options.

SURVEY QUESTIONS

Do you purchase products or materials from suppliers which are then traded with your customer(s)? ☐ No ☐ Yes

WORKERS INFORMATION

TYPE (Please select all worker types that apply)	MALE	FEMALE	ACTION
Please select...	0	0	Remove

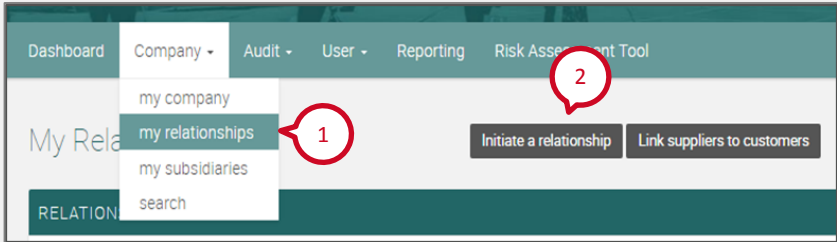
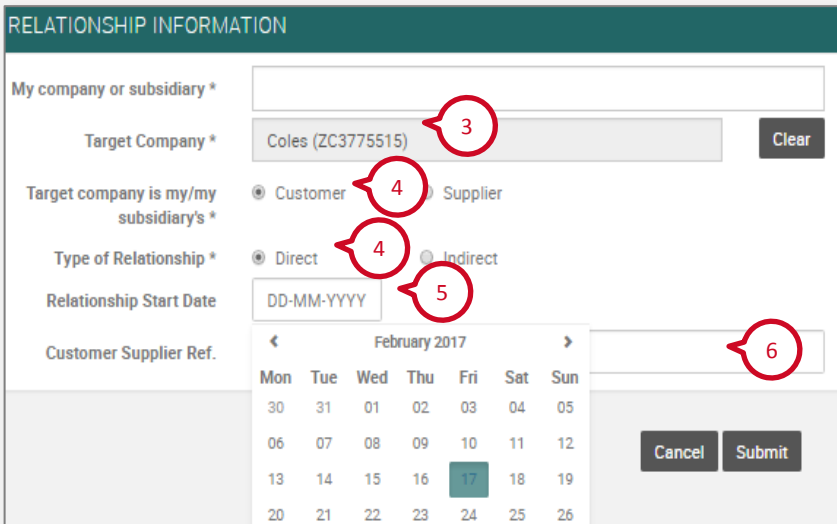
Add New Worker Type

Cancel Clear Submit

Ethical Sourcing

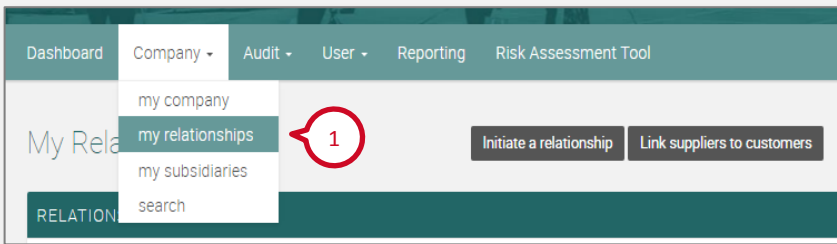
Supplier Approval & Management Using Sedex

Initiate a Customer Relationship - for Initiating a Connection with Coles

Process	On-Screen Example
<ol style="list-style-type: none"> Go to Company > My Relationships Click on "Initiate a Relationship" 	
<ol style="list-style-type: none"> Type 'Coles' in the second text box titled 'Target Company'. Target Company is my Customer and type of Relationship is Direct. Enter current date as Relationship Start Date. Leave Customer Supplier Ref as blank. 	

Accept a Relationship Request

For Accepting a Relationship Request Coles Has Sent to Your Organisation

Process	On-Screen Example
<ol style="list-style-type: none"> Go to Company > My Relationships 	

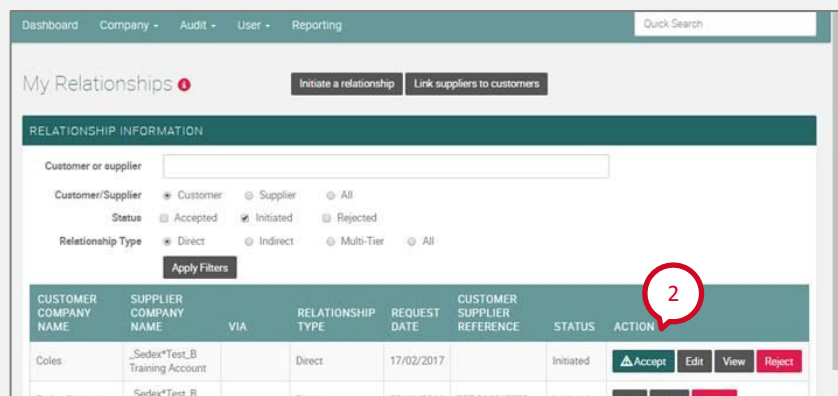
Ethical Sourcing

Supplier Approval & Management Using Sedex

Process

2. Click 'Accept' in the Action column next to the Coles relationship request

On-Screen Example

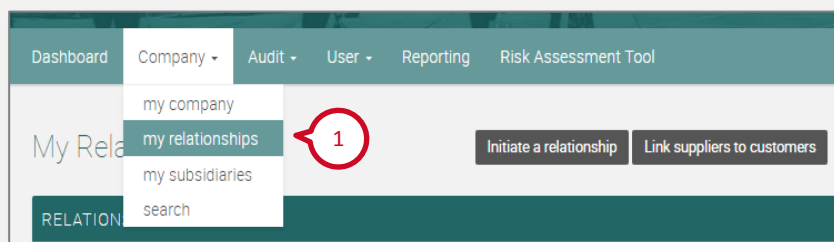


Grant Coles Site Visibility

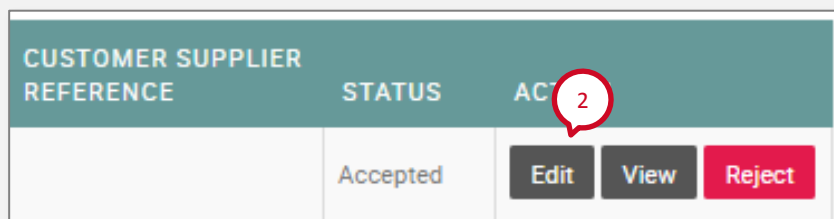
Process

1. Go to Company > My Relationships

On-Screen Example



2. Click 'Edit' in the Action column next to Coles



Ethical Sourcing

Supplier Approval & Management Using Sedex

Process

3. Click on the drop-down to view and select all sites supplying to Coles.

On-Screen Example

EDIT RELATIONSHIP

Customer Company Reference: ZC3775515
Customer Company Name: Coles
Supplier Company Reference: ZC1075722
Supplier Company Name: Sedex*Test_B Training Account
Relationship Type: * Direct (selected) Indirect
Relationship Start Date: 17-02-2017
Customer Supplier Reference:
Site(s) Visibility: Apple Farmer, BJN Industrial (selected) Apple Farmer BJN Industrial BJN Industrial Czarmy's Apple Farm KK

4. Select Contacts, Details, SAQ and Audit visibility.

Site(s) Visibility	SITE NAME	DETAILS	CONTACTS	SAQ	AUDITS	REFERENCE
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Multiple Sites – Global SAQ

For Companies with multiple sites under the same management polices and processes

Process

1. Go to Company > my company

On-Screen Example

Dashboard Company (selected) Audit User

my company

Ethical Sourcing

Supplier Approval & Management Using Sedex

Process

2. Click on the Global Self Assessment Questionnaire bar and the button 'Global SAQ'.

3. Click on "Edit" to start with any of the sections / SAQ pillars.

4. Complete all sections.

5. Click on 'Apply to all Sites

On-Screen Example

My Company ⓘ

Edit Create New Site Create New Supplier Site Payme

GENERAL INFORMATION

Company Reference	ZC3775515	Company Type	Buyer/Supplier (AB Member)
-------------------	-----------	--------------	----------------------------

COMPANY INFORMATION

BILLING INFORMATION

GLOBAL SELF ASSESSMENT QUESTIONNAIRE

Global SAQ

SITES INFORMATION

Global Self Assessment Questionnaire ⓘ

LABOUR

HEALTH AND SAFETY

BUSINESS ETHICS

ENVIRONMENT

Edit

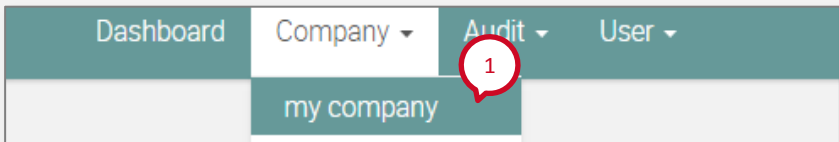
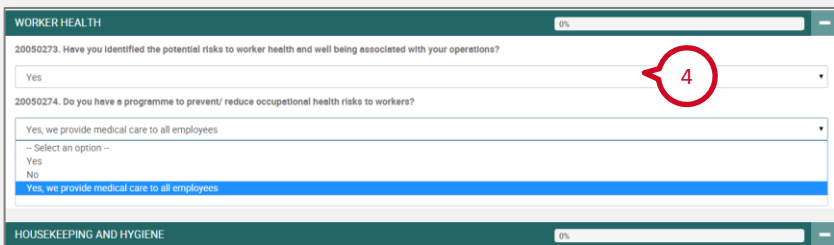
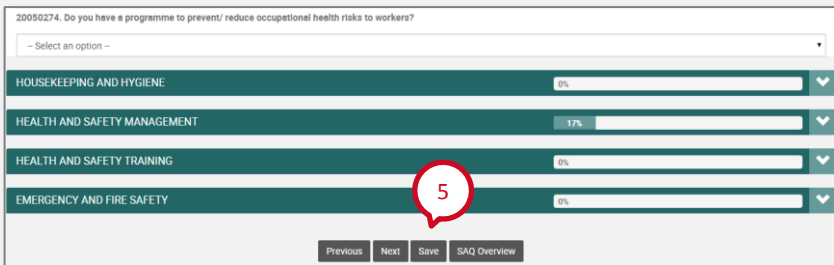
Global Self Assessment Questionnaire ⓘ

Apply to all sites Remove from all sites

Ethical Sourcing

Supplier Approval & Management Using Sedex

Complete the Individual Site SAQ

Process	On-Screen Example
1. Go to Company > my company and scroll to the bottom for your sites' list page	
2. Click on the button "Site SAQ" in the Action column for the relevant site	
3. Click on "Edit" to start with any of the sections / SAQ pillars TIP: To select multiple answers from a drop down menu, press the "Ctrl" button on your keyboard and click on the applicable answers	
4. Complete all sections.	
5. Click on "Save" to save your answers, then "Next" to go to the next set of questions or "SAQ Overview" to go back to the SAQ Overview page and continue with another pillar TIP: Please do remember to save your answers, as otherwise if you leave the page without saving or lose internet connection the information will be lost.	
6. If you need to stop and get more information, you can save and return to the SAQ later.	

Ethical Sourcing

Supplier Approval & Management Using Sedex

Site Risk Rating

Based on the outcome of your site SAQ, and embedded risk based on Maplecroft data, Sedex will produce a site risk rating for each site.

Coles has visibility of these risk ratings, and will enter them into Coles Fusion where suppliers will be able to view them.

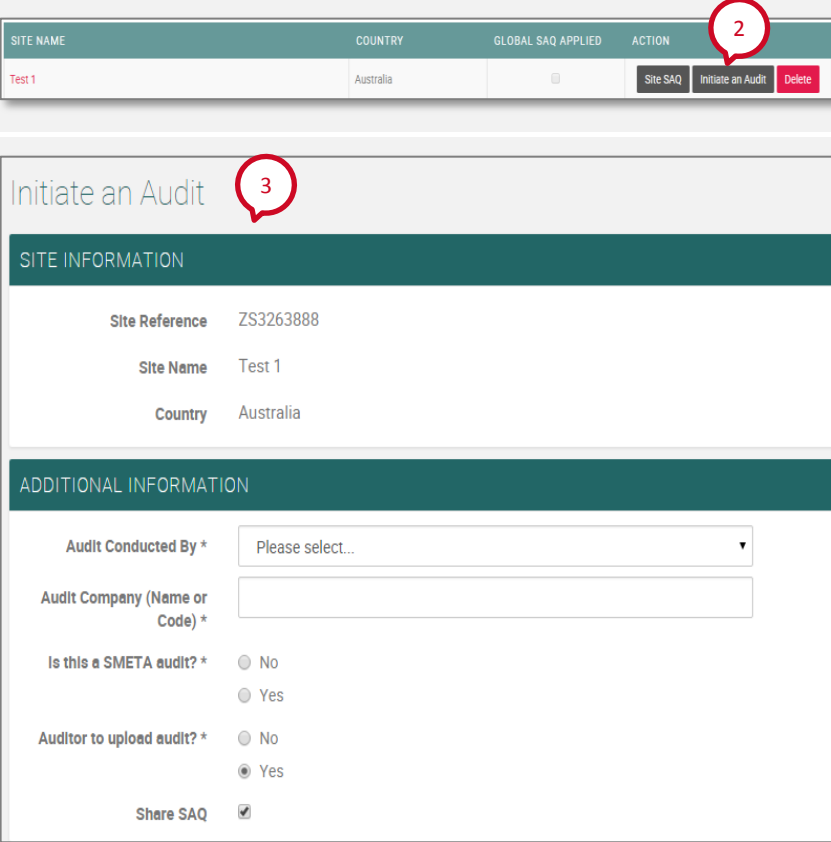
- If your site is rated Low, you will NOT be required to undertake an audit, simply to update your Sedex SAQ in 12 months.
- If your site is rated Medium, you will be required to engage an audit and upload it onto Sedex, and have all major and critical non-conformances closed out. An approved audit will lead to 24 months of site approval.
- If your site is rated HIGH, you will be required to engage an audit and upload it onto Sedex, and have all major and critical non-conformances closed out. An approved audit will lead to 12 months of site approval.

Coles will enter a date for booking an audit in Coles Fusion, and Suppliers will receive a notification from Fusion.

Upload an Audit

Suppliers will be advised of requirements, based on Coles Ethical Sourcing Risk Rating.

If required to upload an audit, suppliers should follow the below instructions. The preference is for the auditor to upload the audit.

Process	On-Screen Example
<ol style="list-style-type: none">1. Go to Company > My company2. Click on Initiate an audit against the relevant site.3. If the auditor is uploading the audit report, the following screen appears.	

28

Ethical Sourcing

Supplier Approval & Management Using Sedex

Process

- If the supplier uploads the audit, the following screen appears.

On-Screen Example

My Audits 5

AUDIT INFORMATION

Audit Date From: DD-MM-YYYY To: DD-MM-YYYY

Site/Supplier Name/Code:

Country: Please select...

Audit Code:

Apply Filters

AUDIT CODE	SITE NAME	SITE REFERENCE	COUNTRY	TYPE	AUDIT DATE	STATUS	NON COMPLIANCES	ACTION
ZAA3266308	Test 1	ZS3263888	Australia	Semi-announced	01/01/2015	Published		Attachments View Findings View Report

- Once the submit button is clicked, the report is published and is visible to the customer. The audit is displayed on the following screen as follows.

My Audits 5

AUDIT INFORMATION

Audit Date From: DD-MM-YYYY To: DD-MM-YYYY

Site/Supplier Name/Code:

Country: Please select...

Audit Code:

Apply Filters

AUDIT CODE	SITE NAME	SITE REFERENCE	COUNTRY	TYPE	AUDIT DATE	STATUS	NON COMPLIANCES	ACTION
ZAA3266308	Test 1	ZS3263888	Australia	Semi-announced	01/01/2015	Published		Attachments View Findings View Report

Link to Indirect Customer & Grant Full Site Visibility

Below mentioned steps are for Suppliers that have created a site of employment and have activated their account by making a payment. This step should be followed if the site supplies to Coles via an agent/ broker.

Process

- Go to Company > My Relationships
- Click on "Initiate a Relationship"

On-Screen Example

Dashboard Company Audit User Reporting Risk Assessment Tool

My Relationships

my company
my relationships
my subsidiaries
search

Initiate a relationship Link suppliers to customers

Ethical Sourcing

Supplier Approval & Management Using Sedex

Process

Steps to link and grant full Site Visibility

3. This is the window where you define your relationship with your indirect Customer.

- Your company name appears in the first textbox.
- Type 'Coles' in the second text box titled 'Target Company'.
- Target Company is my Customer
- Type of Relationship is Indirect.
- Relationship Start Date is current date.
- Leave Customer Supplier Ref as blank.

On-Screen Example

Target Company *

Target company is my/my subsidiary's * ☐ Customer ☒ Supplier

Type of Relationship * ☐ Direct ☒ Indirect

Relationship Start Date DD-MM-YYYY

Customer Supplier Ref.

Cancel Submit

Target company is my/my subsidiary's * ☒ Customer ☐ Supplier

Type of Relationship * ☐ Direct ☒ Indirect

Relationship Start Date DD-MM-YYYY

Customer Supplier Ref.

SITE(S) INFORMATION

Site(s) Visibility

September 2016

Mon	Tue	Wed	Thu	Fri	Sat	Sun
29	30	31	01	02	03	04
05	06	07	08	09	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	01	02
03	04	05	06	07	08	09

Cancel Submit

4. Next to grant full site visibility in the same Window, look at the section titled Site Information.

5. Click on the drop down for site visibility.

SITE(S) INFORMATION

Site(s) Visibility

Please select...

Test 1

Test 2

Test 3

Test 4

Previous Next

Submit

6. From the dropdown, select the relevant sites. Once you have selected, you will see a tick for that site.

SITE(S) INFORMATION

Site(s) Visibility

Test 1

SITE NAM

Test 1

Test 2

Test 3

Test 4

Previous Next

Submit

SAQ	AUDITS
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Ethical Sourcing

Supplier Approval & Management Using Sedex

Process

7. Next to grant site visibility, ensure that details, contacts, SAQ and audits are ticked for every site that is selected.

8. When all the steps have been completed, click on Submit

On-Screen Example

Link Suppliers to Customers

Process

Steps to link suppliers to customer

1. Go to Company > My Relationships
2. Click on the button "Link suppliers to customers"

3. Select a customer and a supplier organisation from the lists and click on "Yes" to confirm the proposed indirect relationship, **to be accepted both by the supplier and customer.**

NOTE: Additionally the supplier needs to set the access rights by clicking on Edit against the accepted link.

On-Screen Example

Sedex Helpdesk and Coles Contacts

UK Helpdesk

- tel. +44 (0)20 7902 2320
- email: helpdesk@sedexglobal.com

US/Canada Helpdesk

- tel. +1 888 487 6146
- email: helpdesk@sedexglobal.com

Coles Ethical Sourcing

- email: ethicalsourcing@coles.com.au

China Helpdesk

- tel. +86 (0)21 6103 1622
- email: helpdeskchina@sedexglobal.com

Ethical Sourcing

Wages & Benefits Remediation Requirements

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions. Under the Ethical Sourcing Policy, Coles considers Wages and Benefits as a major supplier issue.

This Supplier Requirement outlines Coles' expectations in regard to remediation of non-conformances relating to workers' wages and benefits, suppliers must comply with this Requirement.

Definitions

Wages and Benefits

- 1.1. Wages and benefits paid for a standard working week must meet as a minimum national or industry standards, whichever is the higher.
- 1.2. 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 that they are paid.
- 1.3. Deductions from wages may only occur if authorised by law and with the express written permission of the worker concerned.
- 1.4. Deductions from wages for disciplinary measures are not permitted.

Supplier Requirements

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

1 Record-keeping

In Australia, under the Fair Work Act (2009) and the Fair Work Regulations (2009) an employer must keep employee records. Employers must keep records of pay, overtime, leave, and superannuation.

Employers must also keep a record (for example, a letter of offer or contract of employment) for each employee that includes: the name of the employer and the employee, whether the employment is full-time or part-time, whether the employment is casual, temporary or permanent, the date the employee's employment began, and the employer's ABN (if any).

All records must:

- 1.1. Be in a form that is readily accessible to an independent auditor.
- 1.2. Be in a legible form and in English.
- 1.3. Be kept for seven years.
- 1.4. Not be altered unless for the purposes of correcting an error (and the nature of the error and the correction must be noted on the altered record).
- 1.5. Not be false or misleading to the employer's knowledge.

2 Pay slips

- 2.1. Pay slips must be issued to each employee within one working day of pay day, even if an employee is on leave.
- 2.2. Pay slips must be issued to each employee in electronic form or hard copy.
- 2.3. A pay slip must include all of the following: the employer's name, the employer's ABN (if any), the employee's name, the date of payment, the pay period, the gross and net amount of payment. It must also include details of any loadings, monetary allowances, bonuses, incentive-based payments, penalty rates, deductions, superannuation contributions and name of fund, and any other separately identifiable entitlement paid.

Ethical Sourcing

Wages & Benefits Remediation Requirements

- 2.4. If the employee is a casual or irregular part-time employee who is guaranteed a pay rate set by reference to time worked, the hours worked by that employee.

In addition, records that must be kept relating to hours worked by employees include the following:

- 2.5. If a penalty rate or loading must be paid for overtime hours actually worked, a record of the number of overtime hours worked each day, or a record of when the employee started and finished working overtime hours.
- 2.6. If the employer and employee have agreed to the employee taking time off instead of being paid for overtime worked, a copy of the written agreement.
- 2.7. If the employer and employee have agreed to an averaging of the employee's work hours, a copy of the written agreement.

3 Piece Rates

Under the Fair Work Act (2009), employees paid piece rates are paid by results instead of getting an hourly or weekly pay rate. An employee can be hired to work a mix of piece rates and hourly rate shifts. The purpose of piece rates is to improve productivity in the workplace, as opposed to undercutting minimum entitlements.

An employee can be paid piece rates when:

- 3.1. An award or registered agreement allows for piece rate payments and the employee is paid in accordance with that award or agreement.
- 3.2. The employee isn't covered by an award or registered agreement and they get a pay rate based on how much work they do. However, the employee must still receive at least the national minimum wage.
There must be a piece rate agreement between the employer and employee.
- 3.3. The piecework agreement must be written and signed by the employer and the employee, and set out the pay rate per piece and how it is measured. An employer has to keep the agreement as part of their records and give a copy to the worker.
- 3.4. If there is no signed piecework agreement, the worker is not considered a pieceworker and must get the minimum hourly or weekly rate for the type of work they do.
- 3.5. If the piecework agreement is varied, it must also be in writing and meet the requirements in 3.3.
- 3.6. The piecework agreement must be genuine and made without coercion or duress.
The Horticulture Award (2010) is one award that has extra requirements employers must comply with for pieceworkers.
- 3.7. Under the Award the piecework rate has to allow the average competent employee to earn at least 15% more per hour than the relevant minimum hourly rate in the Award. For casual employees, this calculation must include the casual loading prescribed by the Award.
- 3.8. Suppliers should keep a record of how they calculated the piecework rate/s (cost per unit), including determining the pick rate of an average competent employee.
- 3.9. The piecework rate/s should be reviewed in light of any changes in the Award rate.
- 3.10. The piecework rate for an 'average competent employee' may change from day-to-day depending upon variables like weather conditions; ripening process; type of bin; type of picking (e.g. selective or stripping), pruning or packing; size of trees/plants; density of trees/plants. The Agreement can include a number of piecework rates for these variable situations or the supplier can agree to vary the Agreement or make a new agreement for each change.
- 3.11. If the piecework rate/s is varied, it must be agreed between the worker and supplier, put in writing and signed by both and meet the requirements in 3.3.

Ethical Sourcing

Wages & Benefits Remediation Requirements

4 Obligations to Labour Hire Workers

Labour Hire Workers will be covered by the relevant modern award and the National Employment Standards (NES) regardless of the employment arrangements that are in place at the supplier organisation (Host).

- 4.1. The Labour Hire Provider is the employer responsible for meeting all of the employment entitlements of the Labour Hire worker.
- 4.2. Both the Labour Hire Provider and the supplier (Host) have obligations in relation to workplace health and safety. Workplace health and safety is regulated by state and territory workplace health and safety authorities.
- 4.3. As Hosts, suppliers have obligations under State and Commonwealth equal opportunity legislation to ensure that Labour Hire Workers are not subjected to discrimination or sexual harassment in the workplace. Suppliers also have obligations under the Fair Work Act (2009) in relation to general workplace protections, including unlawful workplace discrimination.
- 4.4. Suppliers should be aware that they may be liable for breaches of the Fair Work Act (2009) (such as Labour Hire workers being underpaid or not receiving their entitlements under the National Employment Standards (NES) or a modern Award). Involvement in a breach can include if suppliers knew, or ought to have known, about the breaches and did not take reasonable steps to prevent them.

5 Remediation Steps

Underpayment or failure to pay wages and benefits refers to the situation when a supplier fails to pay the minimum monetary amounts including allowances, prescribed under an award or agreement. Underpayment or failure to pay wages and benefits of workers is unlawful and considered a major breach of Coles' Ethical Sourcing Policy and Coles Trading Agreement.

- 5.1. The supplier must agree that it is unlawful and unethical to withhold workers payment or underpay workers. It is in serious breach of Coles Ethical Sourcing Policy and a contravention of the Fair Work Act (2009).
- 5.2. Within the period provided in the supply agreement between the supplier and Coles or within 30 days of notification of the breach, whichever is shorter, the employer should engage (at their expense) an independent third-party (such as an accountant or HR specialist) to determine how long the underpayment has occurred, the total amount owed to workers, and identify all affected workers.
- 5.3. The employer should communicate to the workers that the underpayment has taken place and workers will receive appropriate back-payment. This document should be made available for auditor review.
- 5.4. The employer should pay the owed amount to the affected workers within a reasonable time period, to be agreed with Coles. This payment should be documented via payslips and financial statements and made available for auditor review.
- 5.5. The employer should keep accurate time and wage records to ensure that the workers continue receive their legal entitlements, and to avoid underpayment in the future.
- 5.6. Any Labour Hire Provider to the supplier should provide a written procedure outlining their process ensuring the appropriate payment of workers legal entitlements, including piece rates. This document should be made available for auditor review.
- 5.7. If in Coles' view the supplier does not take the appropriate steps to remedy the underpayment of wages and benefits within a reasonable time, supply to Coles will be immediately suspended, and Coles may terminate the supply agreement and notify the Fair Work Ombudsman.

6 Remediation Follow-up Audit

- 6.1. The supplier must provide Coles with independent evidence to support that this issue has been rectified. This needs to be in the form of a re-audit (at the supplier's expense) from a recognised certification body.

Ethical Sourcing

Wages & Benefits Remediation Requirements

- 6.2. The re-audit must include interviews with workers (selected by the auditor) to verify that all process has been explained correctly to the workers and that the worker is satisfied.

7 Queries

For any queries regarding Wages and Benefits requirements, please contact the Coles Ethical Sourcing Team at EthicalSourcing@coles.com.au.

8 Further Information

Refer to the table below of useful links to additional information. This is not legal advice or an exhaustive list of legal obligations. Suppliers should use the following resources or seek independent advice as appropriate.

Organisation	Document/ Resource	Website Link
Fair work Ombudsman	Minimum workplace entitlements	https://www.fairwork.gov.au/how-we-will-help/templates-and-guides/fact-sheets/minimum-workplace-entitlements
Fair work Ombudsman	Rights and Obligations	https://www.fairwork.gov.au/how-we-will-help/templates-and-guides/fact-sheets/rights-and-obligations
Fair Work Ombudsman	Labour hire employee services - workplace obligations	https://www.fairwork.gov.au/how-we-will-help/templates-and-guides/fact-sheets/rights-and-obligations/on-hire-employee-services-workplace-obligations
Fair Work Ombudsman	Record-keeping & pay slips	https://www.fairwork.gov.au/how-we-will-help/templates-and-guides/fact-sheets/rights-and-obligations/record-keeping-pay-slips
Fair Work Ombudsman	Piece rates & commission payments	https://www.fairwork.gov.au/pay/minimum-wages/piece-rates-and-commission-payments
Fair work Ombudsman	Pay and Conditions Tool – calculating pay rates	https://calculate.fairwork.gov.au/CheckPay/Summary

Ethical Sourcing

Child Labour Remediation Requirements

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions. Under this Policy, Coles considers Child Labour as a critical Supplier issue. This Supplier Requirement outlines Coles' expectations in regard to remediating any identified instances of Child Labour. Suppliers to Coles must develop or participate in remediation plans which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

Definitions

1 Child Labour Definition

- 1.1. 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.
- 1.2. Coles refers to the International Labour Organization's Minimum Age Convention, 1973 (No. 138), where the minimum age for work is defined as being below the age for finishing compulsory schooling, and in any case not less than 15 years of age.

Supplier Requirements

1 Child Labour (Critical)

- 1.1 Suppliers shall not use child labour.
- 1.2 Suppliers must be able to verify the age of all employees to ensure no child labour is used.

2 Remediation Steps

When any instance of child labour is identified, the Supplier must implement the following remediation steps.

- 2.1 The child will be required to immediately cease work, and is to be removed from the workplace. He or she must be given a viable alternative activity and location that is safe and in the best interests of the child.
- 2.2 The child's employment must not be terminated. The child must be given access to schooling, paid an ongoing wage and benefits and guaranteed a job at the factory upon reaching the appropriate age.
- 2.3 The Supplier must contact the parents or authorised guardian of the child to make arrangements to send him or her into their care as soon as possible.
- 2.4 The Supplier must organise reunion of the child with his or her family and have a Supplier representative accompany him or her back to their home. Costs incurred, such as transportation, meals or accommodation, are to be paid by the Supplier. Coles staff and/or a local NGO expert may be sent to witness the child's return to his or her family.
- 2.5 In communication with the child as well as his or her family or authorised guardian, appropriate education should be made available for the child – at least until they are no longer of compulsory school age (formal schooling, transition schooling or vocational training).
- 2.6 The Supplier will continue to pay at least the legal minimum wage to the child until he or she is of legal working age OR no longer in compulsory education.
- 2.7 The Supplier will offer work to another adult member of the family in the child's place where such other family members exist.
- 2.8 The Supplier will be responsible for the child's schooling and bear any expenses related to schooling such as uniforms, supplies, books, etc. They must monitor enrolment and retention of the child in school, including contacting the parents or authorised guardian at least once in every six months.
- 2.9 Monitoring of the child's progress at school by the Supplier will be ongoing, until they are no longer of compulsory school age.

Ethical Sourcing

Child Labour Remediation Requirements

- 2.10 The Supplier must offer re-employment to the child if he or she chooses to return when he or she has reached the minimum legal age.
- 2.11 Details of the remediation plan implementation and monitoring must be accurately recorded and kept by the Supplier, including receipts, photo evidence, records and the child's identification information.
- 2.12 The Supplier must review and develop a corrective action plan to ensure that their age-verification systems are comprehensive and effective and to prevent the reoccurrence of employing child labour.

3 Remediation Follow-up Audit

- 3.1. The Supplier must provide Coles with the child labour remediation plan within 30 days of child labour being identified.
- 3.2. The Supplier will be subject to a follow-up audit within 3 months of the incident being identified to ensure sufficient actions have been taken to prevent further instances of child labour in the workplace.
- 3.3. The Supplier must provide Coles with a summary of remediation plan and monitoring outcomes within 12 months of the incidence of child labour being identified.
- 3.4. If the Supplier cannot provide evidence of sufficient action to prevent further instances of child labour, the Supplier will be deemed Not Approved under the Coles Ethical Sourcing Policy. An Not Approved supplier is not authorised to supply any goods or services to Coles.

4 Queries

For any queries regarding Child Labour Remediation requirements, please contact your Coles Product Technologist, and/ or the Coles Ethical Sourcing Team at EthicalSourcing@coles.com.au.

5 Further Information

Refer to the table below of useful links to additional information.

Organisation	Document/ Resource	Website Link
United Nations (UN)	Universal Declaration of Human Rights	www.un.org/en/universal-declaration-human-rights/
United Nations	Convention on the Rights of the Child	http://www.ohchr.org/en/professionalinterest/pages/crc.aspx
International Labour Organisation	Minimum Age Convention 138	http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138
International Labour Organisation	Worst Forms of Child Labour Convention 182	http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

Ethical Sourcing

Forced/Bonded Labour Remediation Requirements

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions. Under this Policy, Coles considers Forced / Bonded labour as a critical Supplier issue. This Supplier Requirement outlines Coles' expectations in regard to remediating any identified instances of Forced / Bonded labour.

Definitions

1 Forced, Bonded and Involuntary Labour

- 1.1. Employment is freely chosen, suppliers must not use forced, bonded or involuntary prison labour.
- 1.2. Forced, bonded or involuntary labour refers to situations in which persons are coerced to work, through the use of violence or intimidation or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.
- 1.3. Coles refers to the International Labour Organization's Forced Labour Convention (1930), which defines forced or bonded labour as all work or service which is exacted from any person under the menace of any penalty, and for which the said person has not offered themselves voluntary.

2 Bonded labour – Employer pays principle

Recruiting migrant workers comprises a range of costs, all of which should be met by the employer. Workers often bear the costs of some or all of these expenses, plus substantial facilitation payments. These costs and the interest on loans taken out to pay them can leave workers in situations of debt bondage.

- 2.1. No worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer. Debt bondage can arise when workers are required to pay a recruitment fee which includes but is not limited to, any fee for applications, recommendations, recruitment, hiring, placement, and administrative, overhead, and processing fees of any kind.
- 2.2. Migrant workers should not pay recruitment and service fees and costs at any stage of the recruitment process, during or after employment, including:

2.2.1. Fees to any parties, including agent, sub-agent, intermediary, or employer.

2.2.2. Pre-departure fees and costs including but not limited to:

- Skills tests
- Additional certifications beyond those required for job eligibility
- Medical exams/screening
- Pre-departure training or orientation
- Any other requirements to access the job opportunity

2.2.3. Costs associated with documentation and/or permits:

- New passport, identity documents, or visas needed for the purposes of obtaining employment, including renewal(s)
- Temporary work or residence permits (including renewals)
- Police clearance fee
- Birth certification fee
- Certificate of good behaviour fee
- Other certifications, identity or clearance documents required for residing in the country of employment

2.2.4. Transportation and lodging costs (including all taxes and fees):

Ethical Sourcing

Forced/Bonded Labour Remediation Requirements

- Transportation and lodging costs after the employment offer has been made and accepted in writing from the worker's home to the port of departure.
- Transportation from the worker's home (sending) country to receiving country port of entry.
- Transportation from receiving country port of entry to workplace or provided accommodations.
- Border-crossing fees
- Relocation costs if asked to move once employment has begun.
- Return transportation to employee's home country at the end of employment

2.2.5. Arrival / orientation / on-boarding including but not limited to:

- New-hire training or orientation
- Medical exams/screening

2.2.6. Legal requirements including but not limited to:

- Deposits and/or bonds (including those required by law or not required by law).

2.3. Bonds represent a critical breach of the Coles Ethical Sourcing Policy.

Supplier Requirements

1 Forced, Bonded or Involuntary Labour (Critical)

- 3.1. Suppliers must not use Forced, Bonded or Involuntary Labour.
- 3.2. Employment must be freely chosen.
- 3.3. Workers must not be required to lodge deposits, bonds or recruitment fees with recruitment agents or suppliers.
- 3.4. Workers must not be required to surrender identity papers or other important documents to recruitment agents or suppliers.
- 3.5. Workers must be free to leave their employment after reasonable notice has been given.
- 3.6. Outstanding payments due to workers on termination are to be paid in full (or no later than the next payroll run). Workers must not be coerced to continue working to receive any outstanding monies.
- 3.7. The way a worker is engaged must be legally compliant and properly record who employs the worker. For example, under appropriate contract/s if the worker is an employee or contractor or labour hire.
- 3.8. If a worker is engaged through a labour hire provider, the supplier must ensure the provider has any necessary licences.
- 3.9. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. If the supplier provides worker accommodation; the fees must not be unreasonable, and must take into account the proportion of the worker's wage that will remain after accommodation costs
- 3.10. Worker fines imposed by the employer (for example, monetary fines or deductions are levied if a worker does not work a minimum or set period of time) are strictly prohibited.
- 3.11. All disciplinary measures, including termination of employment, should be recorded and compliant with national law.
- 3.12. Deductions from wages as a disciplinary measure shall not be permitted, nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned.

Ethical Sourcing

Forced/Bonded Labour Remediation Requirements

2 Remediation Requirements – Forced Labour - Withheld Identification Documents

The supplier must agree that it is unlawful and unethical to retain migrant or domestic worker passports or identification documents. It is in serious breach of Coles Ethical Sourcing Policy and a form of Forced Labour. This is regardless of whether the worker gives permission to the supplier or not.

- 4.1. The supplier should communicate to the workers that they are responsible for their own passports and any other identification documents and visa documents.
- 4.2. The supplier should communicate this via a written memo on the company letter head in the local language and all employees' native languages. This document should be prominently displayed in the workplace (i.e. in the canteen / hostel / change rooms), and made available for auditor review.
- 4.3. The supplier should communicate via meetings with workers that this new procedure is now in place. The factory should provide evidence that these meetings have taken place for auditor review.
- 4.4. The supplier should prepare a document stating the names of each of the foreign workers, with their signature against their name, to state that they have, received their passports and any other identity documents back. This document should be made available for auditor review.
- 4.5. The supplier should gain agreement with the workers as to how they can best manage the safe keeping of their personal documents such as passports, identification papers and visa documents. Where workers organise their own accommodation, workers can choose to retain and safely store their important documents in their homes or accommodation.
- 4.6. Where workers are accommodated by the supplier, the supplier is to make available to the workers an individual lockable cupboard for their documents and other personal affects with the key retained by the workers, or a communal safe for all workers' important documents, where the key is held by an elected worker representative(s). These arrangements must take into account employee's right to privacy under applicable laws.
- 4.7. The elected worker representative(s) should have direct access to the safe and not have to contact the management representative for approval. The election process should be documented for auditor review. The supplier should ensure that management of the site hold a spare key in the office (in case other keys are lost). An additional supporting process is to have a log book to ensure that passports accessed and returned to the safe are documented and verified.
- 4.8. Establish a procedure to re-elect worker representatives annually, or in the case that the worker representative leaves the company.
- 4.9. All workers should have 24 hour access to their employee representative(s) and management representative should they require access to their passport or other important documents.
- 4.10. The supplier may retain the right to request to view employee passports for the purpose of renewing work visas etc. with the relevant government authorities. Upon completion, the passports must be returned to the worker directly or to the agreed accessible safe.
- 4.11. In addition, in the case where a supplier engages workers via a labour hire provider, the supplier should require the labour hire provider to agree in writing that any labour hire workers contracted into their facility must comply with rules for protection against forced labour, and that labour hire employees must retain their own passports and any other identity and visa documents at all times. This document should be made available for auditor review.

Ethical Sourcing

Forced/Bonded Labour Remediation Requirements

3 Remediation Requirements –Bonded Labour

Requiring workers to pay a recruitment fee or deposit for their employment or contract other than or in addition to the direct costs of travel, visas and other legitimate costs is a critical breach of Coles Ethical Sourcing Policy and represents Bonded Labour. The supplier must agree that it is unlawful and unethical to use Bonded Labour, and take the appropriate steps to free bonded labourers and extinguish debt flowing from such arrangements.

- 5.1. The supplier is responsible for taking preventative measures to remove the risk of bonded labour. This may include not using recruitment agents who charge workers fees, directly undertaking or paying an agent directly the cost for recruitment of workers and the direct employment of workers.
- 5.2. All outstanding worker debt must be waived. Payslips and financial records must be made available for auditor review verifying that the worker is no longer in debt.
- 5.3. Key employment terms and conditions are to be re-issued to all workers in understandable writing and in their own language via letter/agreement/contract, or as required by law. These documents must be signed by both the worker, the supplier, and if relevant the recruitment agent, and must be made available for auditor review.
- 5.4. Outstanding payments due to workers on termination are to be paid in full (or no later than the next payroll run). Workers must not be coerced to continue working in order to receive any outstanding monies. Payslips and financial records must be made available for auditor review.
- 5.5. If the supplier uses third-party recruitment agencies, the supplier must audit these organisations to ensure that hiring practices (including job advertisements and/or application documents) does not require workers to lodge a deposit for their employment. Audits must include worker interviews. Recruitment agencies audit records must be available for auditor review.
- 5.6. In the absence of ethical recruitment agencies in a country, Coles expects the supplier to undertake as much direct recruitment of migrant workers as possible. A direct recruitment strategy must be made available for auditor review.

4 Remediation Requirements – Forced and involuntary labour

Forced labour is any work or service which people are forced to do against their will, under threat of punishment, and represents a critical breach of the Coles Ethical Sourcing Policy and Supplier Requirements. Forced Labour may include where employment is not freely chosen and workers are not free to leave employment after a reasonable notice period, which must not exceed 8 weeks. The supplier must agree that it is unlawful and unethical to use Forced Labour, and take the appropriate steps to free forced labourers.

- 6.1. The supplier is responsible for taking preventative measures to remove the risk of forced labour. This may include not using recruitment agents sourcing vulnerable foreign workers, directly undertaking or paying an agent directly the cost for recruitment of workers and the direct employment of workers.
- 6.2. Any worker found to have entered an employment or contract for services arrangement against their free will must be immediately freed, with no notice period required. Workers must be allowed to freely leave with their earned payment, identity papers and other personal affects.
- 6.3. Any worker that has entered the employment or a contract for services freely, but is subsequently found not to be able to leave their employment or contract for services, must be freed after a reasonable notice period, which must not exceed 8 weeks. Workers must be allowed to freely leave with their earned payment, identity papers and other personal affects.
- 6.4. All outstanding payments due to workers are to be paid in full (or no later than the next payroll run). Workers must not be coerced to continue working in order to receive any outstanding monies. Payslips and financial records must be made available for auditor review.
- 6.5. If the supplier uses third-party recruitment agencies, the supplier must audit these organisations to ensure that hiring and on-going worker management processes (including job advertisements and/or application documents) does not involve any form of forced labour. Audits must include worker interviews. Recruitment agencies audit records must be available for auditor review.

Ethical Sourcing

Forced/Bonded Labour Remediation Requirements

5 Remediation Follow-up Audit

- 7.1. The supplier must provide independent evidence to support that all identified issues have been rectified. This needs to be in the form of a re-audit (at the supplier's expense) from a recognised certification body.
- 7.2. The re-audit must include worker interviews (selected by the auditor) to verify that all process has been explained correctly to the worker and that the worker is satisfied the process has been explained correctly.

6 Queries

For any queries regarding Forced, Bonded and Involuntary Labour Remediation requirements, please contact your Coles Product Technologist, and/or the Coles Ethical Sourcing Team at EthicalSourcing@coles.com.au.

7 Further Information

Refer to the table below of useful links to additional information.

Organisation	Document/ Resource	Website Link
United Nations (UN)	Universal Declaration of Human Rights	www.un.org/en/universal-declaration-human-rights/
United Nations	Convention on the Rights of the Child	http://www.ohchr.org/en/professionalinterest/pages/crc.aspx
International Labour Organisation	Minimum Age Convention 138	http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138
International Labour Organisation	Worst Forms of Child Labour Convention 182	http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182
International Labour Organisation	Forced Labour Convention 29	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029
Australian Commonwealth Law	Criminal Code Act 1995 (section 270 Slavery and Slavery-like Offences)	http://www8.austlii.edu.au/cgi-bin/viewdoc/au/legis/cth/consol_act/cca1995115/schl.html
Australian Fair Work Ombudsman	Young workers and students	https://www.fairwork.gov.au/find-help-for/young-workers-and-students/what-age-can-i-start-work
Ethical Trade Initiative	Base Code Guidance: Living Wages	https://www.ethicaltrade.org/sites/default/files/shared_resources/eti_living_wage_guidance_2.pdf
Ethical Trade Initiative	Base Code Guidance: Modern Slavery	https://www.ethicaltrade.org/sites/default/files/shared_resources/eti_base_code_guidance_modern_slavery_web.pdf
Institute for Human Rights and Business	Responsible Recruitment Framework	https://www.ihrb.org/employerpays/responsible-recruitment-framework

Ethical Sourcing

Safety Instructions and Training Checklist

03 Charter

02 Policy

01 Requirement

01 Tool

Coles is committed to the responsible manufacture and provision of goods and services. This Safety Instruction and Training Checklist outlines Coles' expectations of any Supplier to proactively manage work health and safety risks.

Definitions

1 Safe Working Conditions

- 1.1 Plant and systems of work which are safe and without risk to health will be provided.
- 1.2 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.
- 1.3 Workers must receive adequate, recorded training to perform their jobs in a safe manner.
- 1.4 Personal protective equipment must be supplied and workers trained in its use.
- 1.5 Safeguards on machinery must meet or exceed local laws.
- 1.6 Where suppliers provide worker accommodation, it must be clean, safe and meet the basic needs of workers.
- 1.7 Workers must have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.

Supplier Guidelines

2 Managing Risk

Employers are responsible for managing and reducing work health and safety risks on their sites. Managing work health and safety risks involves four steps:

- 2.1 Identifying hazards -finding out what could cause harm
- 2.2 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
- 2.3 Controlling risks -eliminating or implementing the most effective control measure that is reasonably practicable
- 2.4 Reviewing control measures-ensuring control measures are working as planned.

Deciding what is 'reasonably practicable' to protect people from harm requires taking into account and weighing up all relevant matters including:

- 2.5 The likelihood of the hazard or the risk occurring
- 2.6 The degree of harm that might result from the hazard or the risk
- 2.7 Knowledge about the hazard or risk
- 2.8 Ways of eliminating or minimising the risk, and
- 2.9 The availability and suitability of ways to eliminate or minimise the risk

3 Record Keeping

It is good practice to keep records of risk management activities while they remain relevant. Keeping records of the risk management process demonstrates compliance proactive safety management and may help when undertaking subsequent risk assessments. See below example for Safety Instruction and Training.

Ethical Sourcing

Safety Instructions and Training Checklist

Example Safety Instruction and Training Checklist

Owner / Manager						
Property address						
Completed by:						
Date completed						
Safety Instruction, Training and Supervision						
Hazard	Compliant ? Y/N	Action Planned	Cost	Person Responsible	Target Date	Completed Date
Farm safety induction is conducted for new and all existing workers and contractors on this farm						
All workers are involved in the management of WHS on the farm						
All workers are trained, instructed and supervised when working or using plant and machinery						
All workers who operate forklifts and cranes are trained and have High Risk Work Licences to operate this machinery						
All workers who apply pesticides have a current Chemical User Accreditation						
A Training Register is maintained of all worker training and instruction						

Ethical Sourcing

Safety Instructions and Training Checklist

Hazards and Controls						
Hazard	Risk Level	Action Planned	Cost	Person Responsible	Target Date	Completed Date
There is a system for workers to report new hazards						
Safety information to effectively assess the risk of workplace hazards e.g. safety guides, operator's manuals, Codes of Practice are available for workers and are used to manage hazards and risk in the workplace						
Records of hazard inspections, risk assessment and control are maintained						

Next Review Date:		Address:		Person Responsible	
--------------------------	--	-----------------	--	---------------------------	--

4 Queries

For any queries regarding Coles' worker health and safety expectations, please contact your Coles Product Technologist, and/or the Coles Ethical Sourcing Team at EthicalSourcing@coles.com.au.

Ethical Sourcing

Safety Instructions and Training Checklist

5 Further Information

Refer to the table below of useful links to additional information. This is not legal advice or an exhaustive list of legal obligations. Suppliers should use the following resources or seek independent advice as appropriate.

Organisation	Document/ Resource	Website Link
WorkSafe Australia	Agriculture Industry snapshot	https://www.safeworkaustralia.gov.au/agriculture
SafeWork New South Wales	Manage Workplace Safety	http://www.safework.nsw.gov.au/health-and-safety/manage-workplace-safety
Workplace Health and Safety Queensland	Forms and Resources	https://www.worksafe.qld.gov.au/forms-and-resources
WorkSafe Victoria	Agriculture – safety basics	https://www.worksafe.vic.gov.au/agriculture
WorkSafe ACT	Farm safety	https://www.accesscanberra.act.gov.au/app/answers/detail/a_id/4220/kw/agriculture
SafeWork SA	Agriculture and Horticulture	https://www.safework.sa.gov.au/business-industry/agriculture-horticulture#
NT WorkSafe	Forms and Resources	http://www.worksafe.nt.gov.au/forms-resources/Pages/default.aspx
WorkSafe WA	Safety and health topics	https://www.commerce.wa.gov.au/worksafe/safety-and-health-topics
WorkSafe Tasmania	Resources	https://www.worksafe.tas.gov.au/resources
Comcare	Education and training	http://www.comcare.gov.au/training

Ethical Sourcing

Sedex Self-Assessment Questionnaire Guidance

03 Charter

02 Policy

01 Requirement

02 Tool

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions.

Introduction

Coles utilises the Sedex online portal to manage our Supplier ethical data and approval process. Coles requires all suppliers of Coles Brand, fresh produce and meat to become a 'B' member of Sedex.

Benefits of Supplier 'B' Membership:

- Reduce reputational risk;
- Low membership cost for production sites; and
- Efficient and cost-effective way of sharing ethical information and audit results with multiple customers. To find out which of your customers are Sedex members, see <http://www.sedexglobal.com/about-sedex/buyers-and-suppliers/list-of-members/>

1 Sedex Self-assessment Questionnaire

The Sedex Self-Assessment Questionnaire (SAQ) is a tool for identifying potential risk.

- Facilitates the sharing of information about your companies ethical practices with multiple customers – no duplication which saves time, money and resources;
- The SAQ is a tool which helps identify strengths in current business practices and areas to improve; and
- The SAQ can also be used to help compile a company's code of conduct.

1.1 Ethical Codes

The SAQ is based upon the following codes:

- ETI Base Code: (Ethical Trading Initiative);
- SA8000:2014 – Social Accountability (SAI – Social Accountability International);
- ISO 14001:2015 – Environment Management System (International Organization for Standardization); and
- OHSAS 18001 occupational health and safety management system (Occupational Health & Safety Advisory Services).

1.2 Four key pillars

The SAQ comprises of an initial profile section which contains the details of the site of employment, and asks questions across four key pillars:

- **Labour standards:** includes questions on wages, working hours, children and young employees, freedom of association, non-discrimination, forced labour and human rights;
- **Health & safety:** includes questions on management, training, emergency and fire safety and worker health;
- **Environment:** includes questions on environmental management, waste, raw materials, water, energy and pollution; and
- **Business ethics:** includes questions on bribery and corruption.

Ethical Sourcing

Sedex Self-Assessment Questionnaire Guidance

1.3 Sector-specific profiles

The SAQ is divided into six sector profiles depending on the industry; Sedex will have varying questions in the SAQ relevant to that industry. The SAQ sector profile will be decided by the **Site Function** field in the site profile.

This means that you only answer questions that are appropriate to your industry, the six sector profiles are:

- Manufacturing – 225 questions
- Service providers – 217 questions
- Heavy engineering – 210 questions
- Agriculture (big) – 203 questions
- Intermediaries – 93 questions
- Agriculture (small, 30 employees or less) – 67 questions (please note these sites are not required to complete the Business Ethics section of the SAQ)

2 FAQs - completing the SAQ

Q: There are questions with multiple answers, how should I answer?

A: You can select multiple answers, to do so hold the 'CTRL' key on your keyboard, and select all relevant answers.

Q: Can I upload certificates or policies?

A: Yes, some questions will facilitate uploads, select the browse button and select the relevant document(s) from your computer to upload.

Pro Tip: if your company does not have a policy, you can pause the SAQ and save your progress, write the relevant policy and then upload it onto Sedex. Please see the Resources and References section for tools and useful website links.

Q: I have selected yes to an answer which may identify risk, can I explain my choice?

A: Yes, some questions have follow-up questions which ask for more information about your original answer, these questions will have a free-fill text box please give as much detail as possible.

Q: Do I need to complete every question?

A: Yes, incomplete or empty SAQ can result in higher risk rating for the site.

Q: How often should I update the SAQ?

A: Coles requires that the SAQ is updated annually to ensure the information captured is accurate.

Q: I have multiple sites, do I need to complete an SAQ for each one?

A: Sedex provides a 'Global SAQ' which allows the company to complete questions, for example about policies in your company, and apply the answers to the SAQs of multiple sites.

Select Company>My Company >Global SAQ, the SAQ will display questions across all four pillars to answer these questions select 'Edit' on the bottom of the page.

Please note, the Global SAQ only partially completes the SAQs for multiple sites, you will need to go into each sites profile and complete the remaining questions separately.

Ethical Sourcing

Sedex Self-Assessment Questionnaire Guidance

Q: The site is in a remote location and internet connection can be inconsistent, can I complete the SAQ offline?

A: Yes, complete the SAQ in whole or in parts whilst being offline and upload the answers onto Sedex when internet becomes available.

You can access the offline function from the SAQ overview page, select 'offline mode', you will be prompted to bookmark the page (select 'CTRL' and 'D' keys). You can access the bookmark page at any time by opening your browser, even if you do not have internet access. Once you are ready to upload the SAQ answers, on the overview page select 'upload offline SAQ', this information will now be visible to your customers.

*Pro Tip: We recommend that you let Coles know you are completing the SAQ offline via your Coles Brand Product Technologist or the **EthicalSourcing@coles.com.au** mailbox.*

3 Resources and References

Refer to the table below of useful links to additional information.

Resource	Internet site address
Coles Ethical Sourcing Policy	https://www.supplierportal.coles.com.au/csp/wps/portal/web/QualityColesBrands/CharterPolicyRequirementsTools
Coles Ethical Sourcing Supplier Requirements	https://www.supplierportal.coles.com.au/csp/wps/portal/web/QualityColesBrands/CharterPolicyRequirementsTools
Sedex - Registration	https://www.sedexglobal.com/sitemap/join-sedex/
Sedex - Log-in	http://www.sedexglobal.com/login/
Fair Work Ombudsman – templates and guides	https://www.fairwork.gov.au/how-we-will-help/templates-and-guides
International Labour Organisation – Conventions	http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12000:0::NO
Ethical Trade Initiative – Base Code	https://www.ethicaltrade.org/eti-base-code

Ethical Sourcing

Worker Accommodation Supplier Guidelines

03 Charter

02 Policy

01 Requirement

03 Tool

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions. Coles recognises that some suppliers provide or facilitate accommodation to workers employed in their operations. This Supplier Guideline outlines Coles' expectations of any Supplier that is providing Worker Accommodation.

Definitions

1 Worker Accommodation Definition

- 1.1. Worker accommodation is defined as any accommodation and sleeping facilities provided for out of work hours, arranged on the workers' behalf. It may be provided at no cost or at a rental fee agreed with the worker, paid by the worker, the Supplier or a labour provision contractor.

Supplier Guidelines

1 Local Guidelines

- 1.1 Suppliers shall abide by all local regulatory requirements and guidelines regarding worker accommodation.

2 Location, Rental Fees and Conditions

- 2.1 Worker Accommodation must be located within a reasonable distance from the worksite, as not to unreasonably extend the working day.
- 2.2 Transport provided by the Supplier to the worksite from the worker accommodation must be safe and any transport fees must be agreed by the worker.
- 2.3 Adequate transport options should be made available for workers to access local community amenities.
- 2.4 Any rental fee arrangements must be fair and transparent. These rental fees must not exceed either the fair market rate for rent in the local area or a reasonable proportion of the worker income.
- 2.5 The practice of withholding worker ID papers, passports, visa documents or work permits is prohibited.
- 2.6 Accommodation regulations must be non-discriminatory, fair and reasonable. Regulations on alcohol, tobacco and third party access to workers accommodation must be clearly communicated to workers. Workers must be provided with a copy of the workers' accommodation rules and guidelines in a language or through a media they understand.
- 2.7 Mechanisms for workers dialogue and conflict resolution should be in place to allow any concerns regarding accommodation to be raised.

3 Water

- 3.1 Workers must have easy access to an adequate supply of clean water.
- 3.2 The quality of water is to be regularly monitored and must comply with local standard requirements.
- 3.3 Tanks used for the storage of water should be covered to prevent stored water from being contaminated.

4 Heating, Air Conditioning, Ventilation and Light

- 4.1 Worker accommodation must, depending on the ambient temperature, be provided with adequate heating, ventilation or air conditioning to maintain a comfortable resting temperature.
- 4.2 Each sleeping room must have at least one operational ceiling-mounted light fixture.

Ethical Sourcing

Worker Accommodation Supplier Guidelines

5 Health and Safety

- 5.1 Worker accommodation buildings must be kept in good repair, with adequate drainage and sewage services.
- 5.2 Worker accommodation must be kept clean and free of garbage. At least one garbage container with a lid should be provided for each sleeping room and emptied when full or no less than twice weekly.
- 5.3 Worker accommodation buildings must be kept free of vermin and insects, and in areas where mosquitoes are prevalent, all workers must be provided with sleeping protection nets.
- 5.4 Separate facilities should be provided for sick workers to prevent the spread of transmissible diseases among the occupants.
- 5.5 First-aid kits shall be provided readily accessible for use by workers at all times and shall contain adequate supplies. An adequate number of staff/workers are to be trained to provide first aid.
- 5.6 Workers should have easy access to medical facilities and fully qualified medical staff.
- 5.7 The accommodation manager should have a duty to report to the appropriate health authority specific diseases, incidents of food poisoning or casualties.
- 5.8 Fire safety measures should be taken, including installing and maintaining fire equipment. Each dormitory sleeping room and all common areas shall have proper and functioning smoke detectors. Proper firefighting equipment shall be provided in an area that is readily accessible from each sleeping room and common assembly rooms.
- 5.9 Each new occupant must receive an orientation on fire safety, emergency evacuation procedures, and training on the use of fire extinguishers. Annual training records should be maintained.
- 5.10 Suppliers must provide a copy of the building's emergency action plan, including a route map, exit doors, evacuation stairwells and a safe assembly point, to all workers and post the plan in visible locations on each floor of the building.
- 5.11 For fire safety reasons, no personal high-voltage electrical equipment (exceeding 36V) is allowed. Suppliers should ensure that extension cords are being used for appropriate application and that multiple outlet adapters or surge protector strips are not being connected to one other.
- 5.12 Radiators and other heating apparatus should be placed so as to avoid risk of fire.
- 5.13 Storage of hazardous or combustible materials is not permitted in sleeping rooms.
- 5.14 Safety exits should be clearly marked, be clear of obstruction and properly maintained. There should be at least two exit routes from each floor of the worker accommodation building, and all exit doors should be unlocked and open outward.
- 5.15 Emergency lighting should be installed, operational and checked regularly.

6 Self-Cooking Kitchen and Laundry Facilities

- 6.1 Where no canteen is provided, adequate self-cooking kitchen facilities must be provided.
- 6.2 Self-cooking kitchen facilities must include cooking facilities, running water and adequate lighting.
- 6.3 Worker accommodation must provide adequate laundry facilities easily accessible to all workers.

Ethical Sourcing

Worker Accommodation Supplier Guidelines

7 Canteen Facilities (if provided)

- 7.1 Where a canteen is provided for workers' meals, the canteen must have persons in charge who have been trained in food safety and handling.
- 7.2 Food preparation, service and storage places are to be adequately ventilated, clean and equipped.
- 7.3 Wall surfaces adjacent to cooking areas must be made of fire-resistant materials and food preparation tables equipped with a smooth, durable, non-corrosive, non-toxic, washable surface.
- 7.4 Food provided must be of appropriate nutritional value.
- 7.5 Food provided should take into account workers' religious requirements and cultural backgrounds.

8 Security

- 8.1 Provisions must be made for workers physical safety and well-being.
- 8.2 Workers must be provided with facilities to secure their private documents and valuables, which allows them ready access when required.
- 8.3 Where single workers share sleeping rooms, rooms shall be separated by gender.

9 Social and Leisure Requirements

- 9.1 Common assembly rooms and adequate recreational facilities should be provided.
- 9.2 Workers should be allowed limited social or business visits at the worker accommodation, providing this does not adversely impact other workers at the accommodation.
- 9.3 Workers must be provided with spaces for religious observance as required or requested by workers.

10 Queries

For any queries regarding Coles' Worker Accommodation expectations, please contact your Coles Product Technologist, and/or the Coles Ethical Sourcing Team at EthicalSourcing@coles.com.au.

Ethical Sourcing

Worker Health and Safety Action Plan

03 Charter

02 Policy

01 Requirement

04 Tool

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions. This Worker Health & Safety Action Plan outlines Coles' expectations of any Supplier to proactively manage work health and safety risks.

Definitions

1 Safe Working Conditions

- 1.1 Plant and systems of work which are safe and without risk to health will be provided.
- 1.2 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.
- 1.3 Workers must receive adequate, recorded training to perform their jobs in a safe manner.
- 1.4 Personal protective equipment must be supplied and workers trained in its use.
- 1.5 Safeguards on machinery must meet or exceed local laws.
- 1.6 Where suppliers provide worker accommodation, it must be clean, safe and meet the basic needs of workers.
- 1.7 Workers must have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.

Supplier Guidelines

2 Managing Risk

Employers are responsible for managing and reducing work health and safety risks on their sites. Managing work health and safety risks involves four steps:

- 2.1 Identifying hazards -finding out what could cause harm
- 2.2 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
- 2.3 Controlling risks -eliminating or implementing the most effective control measure that is reasonably practicable
- 2.4 Reviewing control measures-ensuring control measures are working as planned.

Deciding what is 'reasonably practicable' to protect people from harm requires taking into account and weighing up all relevant matters including:

- 2.5 The likelihood of the hazard or the risk occurring
- 2.6 The degree of harm that might result from the hazard or the risk
- 2.7 Knowledge about the hazard or risk
- 2.8 Ways of eliminating or minimising the risk, and
- 2.9 The availability and suitability of ways to eliminate or minimise the risk

3 Record Keeping

It is good practice to keep records of risk management activities while they remain relevant. Keeping records of the risk management process demonstrates compliance proactive safety management and may help when undertaking subsequent risk assessments. See below example.

Worker Health and Safety Action Plan

Example Work Health and Safety Action Plan

[illegible]

Next Review Date:		Address:		Person Responsible	
--------------------------	--	-----------------	--	---------------------------	--

Ethical Sourcing

Worker Health and Safety Action Plan

4 Queries

For any queries regarding Coles' worker health and safety expectations, please contact your Coles Product Technologist, and/or the Coles Ethical Sourcing Team at EthicalSourcing@coles.com.au.

5 Further Information

Refer to the table below of useful links to additional information. This is not legal advice or an exhaustive list of legal obligations. Suppliers should use the following resources or seek independent advice as appropriate.

Organisation	Document/ Resource	Website Link
WorkSafe Australia	Agriculture Industry Snapshot	https://www.safeworkaustralia.gov.au/agriculture
SafeWork New South Wales	Manage Workplace Safety	http://www.safework.nsw.gov.au/health-and-safety/manage-workplace-safety
Workplace Health and Safety Queensland	Forms and Resources	https://www.worksafe.qld.gov.au/forms-and-resources
WorkSafe Victoria	Agriculture – safety basics	https://www.worksafe.vic.gov.au/agriculture
WorkSafe ACT	Farm safety	https://www.accesscanberra.act.gov.au/app/answers/detail/a_id/4220/kw/agricult
SafeWork SA	Agriculture and Horticulture	https://www.safework.sa.gov.au/business-industry/agriculture-horticulture#
NT WorkSafe	Forms and Resources	http://www.worksafe.nt.gov.au/forms-resources/Pages/default.aspx
WorkSafe WA	Safety and health topics	https://www.commerce.wa.gov.au/worksafe/safety-and-health-topics
WorkSafe Tasmania	Resources	https://www.worksafe.tas.gov.au/resources
Comcare	Education and training	http://www.comcare.gov.au/training

Ethical Sourcing

Cherry Pickers Hazard List

03 Charter
02 Policy
01 Requirement
05 Tool

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions. This Worker Health & Safety Action Plan outlines Coles' expectations of any Supplier to proactively manage work health and safety risks.

Definitions

1 Safe Working Conditions

- 1.1 Plant and systems of work which are safe and without risk to health will be provided.
- 1.2 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.
- 1.3 Workers must receive adequate, recorded training to perform their jobs in a safe manner.
- 1.4 Personal protective equipment must be supplied and workers trained in its use.
- 1.5 Safeguards on machinery must meet or exceed local laws.
- 1.6 Where suppliers provide worker accommodation, it must be clean, safe and meet the basic needs of workers.
- 1.7 Workers must have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.

Supplier Guidelines

2 Managing Risk

Employers are responsible for managing and reducing work health and safety risks on their sites. Managing work health and safety risks involves four steps:

- 2.1 Identifying hazards -finding out what could cause harm
- 2.2 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
- 2.3 Controlling risks -eliminating or implementing the most effective control measure that is reasonably practicable
- 2.4 Reviewing control measures-ensuring control measures are working as planned.

Deciding what is 'reasonably practicable' to protect people from harm requires taking into account and weighing up all relevant matters including:

- 2.5 The likelihood of the hazard or the risk occurring
- 2.6 The degree of harm that might result from the hazard or the risk
- 2.7 Knowledge about the hazard or risk
- 2.8 Ways of eliminating or minimising the risk, and
- 2.9 The availability and suitability of ways to eliminate or minimise the risk

3 Record Keeping

It is good practice to keep records of risk management activities while they remain relevant. Keeping records of the risk management process demonstrates compliance proactive safety management and may help when undertaking subsequent risk assessments. See below example.

Ethical Sourcing

Cherry Pickers Hazard List

Example Cherry Picker Hazard List

Owner / Manager						
Property address						
Completed by:						
Date completed						
Hazard	Risk Level	Action Planned	Cost	Person Responsible	Target Date	Completed Date
All operators are properly trained to use cherry pickers						
All cherry pickers are serviced and maintained according to manufacturer's safety directions						
A preoperational check of controls and safety systems (brakes, hydraulics and pins) is conducted before each days use						
All cherry pickers are inspected and maintained as described in Annex 1 of the Australian/NZ Standard 2550.10 <i>Cranes, hoists and winches Part 10: Mobile elevating work platforms</i>						
All picking bags are in good repair						
The size of picking bags is appropriate for the Safe Weight Limit (SWL) and do not overload the cherry picker						

Ethical Sourcing

Cherry Pickers Hazard List

Hazard	Risk Level	Action Planned	Cost	Person Responsible	Target Date	Completed Date
Safety harness and harness attachments (where an assessment has been made for their use) are used and in good condition						
Hand controls are guarded to prevent tree branches and limbs activating controls						
Foot controls are covered to prevent fruit jamming under the controls						
Cherry picker baskets are kept clean to prevent fruit and debris jamming foot controls						
Additional Hazards (populate as required)						
Next Review Date:		Address:		Person Responsible		

4 Queries

For any queries regarding Coles' worker health and safety expectations, please contact your Coles Product Technologist, and/or the Coles Ethical Sourcing Team at EthicalSourcing@coles.com.au.

Ethical Sourcing

Cherry Pickers Hazard List

5 Further Information

Refer to the table below of useful links to additional information. This is not legal advice or an exhaustive list of legal obligations. Suppliers should use the following resources or seek independent advice as appropriate.

Organisation	Document/ Resource	Website Link
WorkSafe Australia	Agriculture Industry Snapshot	https://www.safeworkaustralia.gov.au/agriculture
SafeWork New South Wales	Manage Workplace Safety	http://www.safework.nsw.gov.au/health-and-safety/manage-workplace-safety
Workplace Health and Safety Queensland	Forms and Resources	https://www.worksafe.qld.gov.au/forms-and-resources
WorkSafe Victoria	Agriculture – safety basics	https://www.worksafe.vic.gov.au/agriculture
WorkSafe ACT	Farm safety	https://www.accesscanberra.act.gov.au/app/answers/detail/a_id/4220/kw/agriculture
SafeWork SA	Agriculture and Horticulture	https://www.safework.sa.gov.au/business-industry/agriculture-horticulture#
NT WorkSafe	Forms and Resources	http://www.worksafe.nt.gov.au/forms-resources/Pages/default.aspx
WorkSafe WA	Safety and health topics	https://www.commerce.wa.gov.au/worksafe/safety-and-health-topics
WorkSafe Tasmania	Resources	https://www.worksafe.tas.gov.au/resources
Comcare	Education and training	http://www.comcare.gov.au/training

Ethical Sourcing

Continuous Improvement Supplier Guide

03 Charter

02 Policy

01 Requirement

06 Tool

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions and establishes the minimum standards when supplying Coles. It is the supplier's responsibility to achieve and maintain these standards and to enforce them within those parts of their supply chains involved in producing or supplying Coles (e.g. raw materials suppliers, processing facilities, factories, warehouses). As our business relationship develops we expect our suppliers to raise their standards and continually improve working conditions.

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 comprise the foundational elements of what is generally 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 and with integrity

Coles' Ethical Sourcing Policy Requirements

Legal Requirements

- 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 Coles' Ethical Sourcing Policy.

Business Integrity

- Suppliers must engage professional business ethics in all dealings and provide transparent documentation and records.
- Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise.

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.

Continuous improvement guidance

- 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 or corruption in all forms.
 - 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.

Ethical Sourcing

Continuous Improvement Supplier Guide

- 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 businesses 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 are readily available to all workers and can 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. Suppliers 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 supply company, or contractor or subcontractor.
- 1.10.1. In Australia **good practice looks like** undertaking a search of the Australian Governments Visa Entitlement Verification Online (VEVO) system, and retraining records of the workers passport, visa and VEVO check.

2. Workers are treated equally with dignity and respect

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, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation

Ethical Sourcing

Continuous Improvement Supplier Guide

Continuous improvement guidance

- 2.1. Suppliers have established policies that prohibit discrimination of any form on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
 - 2.1.1. **Good practice looks like** policies the 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.
 - 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 are set and affirmative action is taken 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

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, or 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), where the minimum age for work is defined as being below the age for finishing compulsory schooling, and in any case not less than 15 years of age.

Continuous improvement guidance

- 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 agencies 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.

Ethical Sourcing

Continuous Improvement Supplier Guide

4. Work is freely agreed with documented terms of employment

Coles' Ethical Sourcing Policy Requirements

Forced/ Bonded Labour

- Suppliers must not use Forced, Bonded or Involuntary Labour.
- Employment must be freely chosen.
- Workers must not be required to lodge deposits or identity papers with suppliers.
- Workers must be free to leave their employment after reasonable notice, not more than 1 month, has been given.

Wages and Benefits

- Wages and benefits paid for a standard working week must meet as a minimum 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.
- 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 that are paid.
- Deductions from wages may only occur with the express written permission of the worker concerned.
- Deductions from wages for disciplinary measures are not permitted.

Continuous improvement guidance

- 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). Supplier should 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** 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.
 - 4.4.3. **Good practice looks like** if labour brokers or agencies 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.
- 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.

Ethical Sourcing

Continuous Improvement Supplier Guide

- 4.6.2. **Best practice extends further** whereby there is a clear and transparent system of worker and management communication that enables workers to consult and have an effective dialogue with management.
- 4.7. All work is compensated according to at least the legal minimum standards or the appropriate prevailing industry standards, whichever is the higher.
- 4.8. 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.
- 4.8.1. **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.
- 4.9. Wages are paid on time and in full.

5. Workers health, safety and wellbeing is safeguarded at work

Coles' Policy Requirements

Safe Working Conditions

- Plant and systems of work which are safe and without risk to health will be provided.
- 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, recorded training to perform their jobs in a safe manner.
- Personal protective equipment must be supplied, and workers trained in its use.
- Safeguards on machinery must meet or exceed local laws.
- Where suppliers provide worker accommodation, it must be clean, safe and meet the basic needs of workers.
- Workers must have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.

Continuous improvement guidance

- 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 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.

Ethical Sourcing

Continuous Improvement Supplier Guide

- 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 which is suitable for the nature of the work or hazard, a suitable size and fit for the individual who is required to use it, and that it 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 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 updated to reflect the changing risk profile of the workplace (refer to Coles' Worker Health and Safety Action Plan for more information).
- 5.6.1. **Good practice looks like:**
- 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' Policy Requirements

Freedom of Association

- 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 are required to adopt an open attitude towards the activities of trade unions and their organisation activities.
- 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.

Ethical Sourcing

Continuous Improvement Supplier Guide

Continuous improvement guidance

- 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 and collective agreements concluded.
- 6.4. Workers know and understand their rights and feel confident to exercise them, and that no other worker or manager will impede them in the enjoyment of that right.
 - 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

Coles' 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.
- Workers must have at least one day off in 7 days or two days off in every 14 days.
- Overtime must be voluntary and compensated as prescribed by local laws.
- Record keeping on hours worked must be accurate, complete and transparent at all times.

Continuous improvement guidance

- 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 over time implement steps 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.

Ethical Sourcing

Continuous Improvement Supplier Guide

- 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. Queries

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

Ethical Sourcing

Packing Shed Hazard Checklist

03 Charter

02 Policy

01 Requirement

07 Tool

Coles is committed to the responsible manufacture and provision of goods and services. This Packing Shed Hazard Checklist outlines Coles' expectations of any Supplier to proactively manage work health and safety risks.

Definitions

1 Safe Working Conditions

- 1.1 Plant and systems of work which are safe and without risk to health will be provided.
- 1.2 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.
- 1.3 Workers must receive adequate, recorded training to perform their jobs in a safe manner.
- 1.4 Personal protective equipment must be supplied and workers trained in its use.
- 1.5 Safeguards on machinery must meet or exceed local laws.
- 1.6 Where suppliers provide worker accommodation, it must be clean, safe and meet the basic needs of workers.
- 1.7 Workers must have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.

Supplier Guidelines

2 Managing Risk

Employers are responsible for managing and reducing work health and safety risks on their sites. Managing work health and safety risks involves four steps:

- 2.1 Identifying hazards - finding out what could cause harm
- 2.2 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
- 2.3 Controlling risks - eliminating or implementing the most effective control measure that is reasonably practicable
- 2.4 Reviewing control measures- ensuring control measures are working as planned.

Deciding what is 'reasonably practicable' to protect people from harm requires taking into account and weighing up all relevant matters including:

- 2.5 The likelihood of the hazard or the risk occurring
- 2.6 The degree of harm that might result from the hazard or the risk
- 2.7 Knowledge about the hazard or risk
- 2.8 Ways of eliminating or minimising the risk, and
- 2.9 The availability and suitability of ways to eliminate or minimise the risk

3 Record Keeping

It is good practice to keep records of risk management activities while they remain relevant. Keeping records of the risk management process demonstrates compliance proactive safety management and may help when undertaking subsequent risk assessments. See below example for a packing shed hazard checklist.

Ethical Sourcing

Packing Shed Hazard Checklist

Example Packing Shed Hazard Checklist

Owner / Manager					
Property address					
Completed by:					
Date completed					
Packing Shed Infrastructure					
Hazard	Compliant? Y/N	Action Planned	Person Responsible	Target Date	Completed Date
There is good lighting in the shed for all work.					
There is good airflow and ventilation in the packing shed.					
There is sufficient open space and ventilation to allow exhaust fumes from trucks and forklifts to escape without effecting worker health.					
The design of the packing shed allow for good movement of workers and traffic flow.					
The packing shed is kept clean and dry to prevent the risk of slips, trips and falls.					
Does the packing shed have an earth floor that may create dust hazards?					
The packing shed power boards are fitted with Residual Current Device (RCD) installed on power circuits.					
The RCD is regularly inspected and tested.					
Cement floors are capable of carrying appropriate weights without cracking or potholing.					
There are no cracks or potholes in the floor causing trip hazards.					
There are appropriate fire extinguishers in the shed.					
The packing shed doors and fire exits are fitted with signs that meet required Australian Standards and building fire regulations.					

Ethical Sourcing

Packing Shed Hazard Checklist

Unloading/ Loading Area					
Hazard	Risk Level	Action Planned	Person Responsible	Target Date	Completed Date
There is good light in the loading/ unloading area.					
Bins and crates are stacked properly and not too high to prevent the risk of bins toppling.					
Unloading machinery is guarded to prevent worker entanglement.					
Traffic is managed to prevent collision when unloading bins.					
Bin tippers and floatation tanks are designed and guarded to prevent workers falling in.					
Grading and Packing					
All mechanical moving parts which pose a risk of operator entanglement are properly guarded.					
There Is good lighting above the sorting and packing tables.					
The working height for fruit grading and packing is at a good height or adjustable to accommodate the height of worker.					
The design of the packing lines minimise the amount of lifting and bending eg when lifting boxes, stacking pallets.					
The floor surface is acceptable or mats are used when standing for long periods of time to prevent or reduce fatigue.					
Emergency Stop buttons located near and in reach of the operator.					
Emergency Stop buttons are regularly tested.					
Sorting and grading machinery be locked out and tagged during maintenance.					
Ear muffs or plugs available where required for all workers exposed to loud noise.					

Ethical Sourcing

Packing Shed Hazard Checklist

Hazard	Risk Level	Action Planned	Person Responsible	Target Date	Completed Date
There are safety signs warning of hazards and they are positioned at an appropriate height.					
All glass light tubes and bulbs are covered to protect from broken glass.					
Lifting aids, trolleys and pallet jacks available and used to reduce injury when lifting.					
Post-harvest treatment sprays and dips enclosed and ventilated to prevent fumes and splash to workers.					
Packing lines long enough to allow post-harvest treatment to dry on treated produce before being packed.					
PPE is provided and worn by workers packing and handling treated produce as required on the pesticide product label.					
There is sufficient room for pallet shrink wrapping and strapping machines.					
Automatic wrapping and strapping machines are guarded.					
Pedestrian traffic is kept away from pallet wrapping and strapping machinery.					
There is good room for assembling and storing produce packing trays and cartons.					
Employee Amenities					
Employee amenities, including First Aid, meal rooms, hand washing and toilet facilities are available.					
All amenities are kept clean and hygienic.					
Soap is available for washing hands.					
There is potable drinking water for workers available in amenity rooms or packing sheds.					

Ethical Sourcing

Packing Shed Hazard Checklist

Forklifts					
Hazard	Risk Level	Action Planned	Person Responsible	Target Date	Completed Date
All forklifts are fitted with a Falling Object Protection (FOPS).					
All bins, crates and pallets stacked to reduce falling/ toppling.					
When loading at night, there is good lighting in the loading area.					
The area where forklifts are operating is free of obstacles.					
The maximum lifting capacity (SWL) of the forklift clearly placarded.					
The forklift controls clearly labelled eg tilt up / down lever.					
All chains and slings meet the load requirements, comply with Australian Standards and are regularly inspected and checked for wear.					
There is a designated area out of the packing shed for parking and charging electric forklifts and batteries away from pedestrian and other traffic.					
All forklifts are fitted with an audible and functioning reversing alarm.					
Cool Rooms					
All cool rooms have good lighting					
Cool room floors are kept dry and clean to prevent buildup of mould.					
Controlled atmosphere cool rooms have good ventilation, exhaust and purging systems.					
Cool rooms used as controlled/ modified atmosphere stores been identified as Confined Spaces.					
Controlled atmosphere cool rooms are properly ventilated/ exhausted before workers enter.					
All refrigeration systems and motors checked to reduce risk explosion in ethylene storages and ripening rooms.					

Ethical Sourcing

Packing Shed Hazard Checklist

Trucks and Transport					
Hazard	Risk Level	Action Planned	Person Responsible	Target Date	Completed Date
There is a fall arrest system in place on trucks to prevent workers and drivers falling when working on tops of truck trailers securing and tarping loads.					
Loading bays are well lit when delivering/ unloading or loading produce at night.					
All truck drivers and workers involved loading produce wear appropriate work boots.					
Truck drivers and produce carriers plan for sufficient time to reduce fatigue when driving long distances.					
High visibility vests worn when loading or unloading trucks at night.					
All trucks fitted with audible reversing alarms.					
Policy and Practice					
All workers been trained and instructed in the operation of machinery and packing shed equipment.					
All forklift truck operators have High Risk Work Licences endorsed (LF) for operating forklifts.					
All workers that enter and work in Confined Spaces and controlled atmosphere cool rooms have been properly trained.					
A procedure been developed for working in Confined Spaces.					
There are known and observed rules regarding working in Confined Spaces.					
There is an observer is located outside when people are working in a Confined Space. Modified atmosphere cool rooms have been checked that they are safe to enter.					

Ethical Sourcing

Packing Shed Hazard Checklist

Hazard	Risk Level	Action Planned	Person Responsible	Target Date	Completed Date
There is a rule that all children are not allowed in the packing shed and storage areas.					
There is a known and observed policy that internal combustion engine fork lifts are not left idling in cool rooms or other confined spaces where exhaust fumes can build up creating a dangerous toxic atmosphere.					
There is a policy and plan that is known and observed by all workers, that pedestrians have right of way in areas in where forklifts are used.					
There is a No Smoking policy for enclosed areas including amenity, packing and storage sheds.					
There is a policy and a maximum height pallets and crates are stacked to prevent toppling.					
Job rotation is practiced where required to help prevent repetitive strain injury.					
An Emergency Plan including evacuation and an assembly point been developed in case of an emergency in the packing shed.					

Next Review Date:		Address:		Person Responsible	
--------------------------	--	-----------------	--	---------------------------	--

4 Queries

For any queries regarding Coles' worker health and safety expectations, please contact your Coles Product Technologist, and/or the Coles Ethical Sourcing Team at EthicalSourcing@coles.com.au.

Ethical Sourcing

Packing Shed Hazard Checklist

5 Further Information

Refer to the table below of useful links to additional information. This is not legal advice or an exhaustive list of legal obligations. Suppliers should use the following resources or seek independent advice as appropriate.

Organisation	Document/ Resource	Website Link
WorkSafe Australia	Agriculture Industry Snapshot	https://www.safeworkaustralia.gov.au/agriculture
SafeWork New South Wales	Manage Workplace Safety	http://www.safework.nsw.gov.au/health-and-safety/manage-workplace-safety
Workplace Health and Safety Queensland	Forms and Resources	https://www.worksafe.qld.gov.au/forms-and-resources
WorkSafe Victoria	Agriculture – safety basics	https://www.worksafe.vic.gov.au/agriculture
WorkSafe ACT	Farm safety	https://www.accesscanberra.act.gov.au/app/answers/detail/a_id/4220/kw/agriculture
SafeWork SA	Agriculture and Horticulture	https://www.safework.sa.gov.au/business-industry/agriculture-horticulture#
NT WorkSafe	Forms and Resources	http://www.worksafe.nt.gov.au/forms-resources/Pages/default.aspx
WorkSafe WA	Safety and health topics	https://www.commerce.wa.gov.au/worksafe/safety-and-health-topics
WorkSafe Tasmania	Resources	https://www.worksafe.tas.gov.au/resources
Comcare	Education and training	http://www.comcare.gov.au/training

Ethical Sourcing

Ethical Trade Initiative (ETI) Base Code

03 Charter

02 Policy

01 Requirement

08 Tool

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions.

The ETI Base Code

1. Employment is freely chosen

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall 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

76

Ethical Sourcing

Ethical Trade Initiative (ETI) Base Code

each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract and shall not exceed 48 hours per week*

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.

* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced

7. No discrimination is practised

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation

8. Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

Ethical Sourcing

Ethical Trade Initiative (ETI) Base Code

ETI Principles of Implementation

Preamble

The purpose of the Ethical Trading Initiative (ETI) is to promote improved conditions for workers through the implementation of codes of labour practice based on national law and international labour standards.

By becoming a member of ETI, a company commits itself to adopt and implement the ETI Base Code and to undertake activities intended to promote respect for workers' rights and to achieve real improvements in working conditions within their supply chain.

Member companies should give special attention to the rights of workers most vulnerable to abusive labour practices, notably women, homeworkers, agency workers, temporary workers, migrant workers and smallholders.

These Principles set out the approaches to ethical trade expected of ETI members. It is recognised that members will apply these principles in different ways according to their circumstances, but all members are expected to work towards their full implementation and to report on how they are applying the Principles each year.

Expectations of achievement will be based on a performance framework agreed by members.

Principles

1. Commitment to ethical trade

1.1 Ethical trading, including the adoption of the Base Code and these Principles, is recognised at the highest level as a company objective and the implementation of this policy is assigned to a senior manager.

1.2 Commitment to ethical trading is communicated publicly, throughout the company, to its suppliers and to the people who work in its supply chain.

1.3 The company makes available sufficient resources to ensure that its commitments are fulfilled and that there is continuous improvement in the application of these principles.

1.4 The company requires its suppliers to comply with the Base Code and also requires them to engage with their own suppliers to comply with the Base Code throughout the supply chain.

1.5 The company has a strategy for implementing the Base Code and these Principles, based on time-bound measurable actions.

1.6 The company plays an active role in ETI caucuses and activities and applies good practice learning wherever possible.

1.7 In undertaking ethical trade activities, the company works collaboratively with other ETI members and with other parties including suppliers affected by its activities.

2. Integrating ethical trade into company culture and business practices

2.1 The company selects suppliers with good labour practices that are likely to observe the provisions of the Base Code.

2.2 The company recognises the contribution that stable business relationships can make to the observance of good labour practices and endeavours to establish long-term relationships with its suppliers.

2.3 The company ensures that the terms of agreements with its suppliers such as prices, lead times and quantities are consistent with the ability of the supplier to observe the provisions of the Base Code.

2.4 Buying staff and other personnel whose decisions may affect working conditions and labour practices in the supply chain are made aware of the potential impact of such decisions. They are provided with training and guidelines that enable them to carry out company ethical trading policy and their performance is assessed and managed accordingly.

Ethical Sourcing

Ethical Trade Initiative (ETI) Base Code

3. Capacity building for suppliers and others

3.1 The company provides information, guidance, training and support for its suppliers to observe the Base Code and to comply with any other policies on ethical trade required by the company of its suppliers.

3.2 The company seeks the views of its suppliers over their ability to meet the Base Code given existing buying practices, and assists them to meet their concerns.

3.3 The company ensures that all workers covered by the code, and their representatives, are aware of the provisions of the Base Code and of the commitments to ethical trade that it has made through its ETI membership.

3.4 The company supports and encourages the development of effective management systems among its suppliers and mature systems of industrial relations that require full respect for freedom of association and collective bargaining.

4. Identifying problems in the supply chain

4.1 The company undertakes activities to be aware of the working conditions and labour practices in its supply chain in order to understand the nature and location of risks to ethical trade, uses this information and shares it with other members.

4.2 The company gathers and analyses verifiable information about its suppliers' performance on complying with the Base Code and uses this information to inform its sourcing decisions.

4.3 The company ensures that mechanisms exist to enable workers in its supply chain to report confidentially and without detriment any failure to observe the Base Code and to deal with such complaints.

5. Improvement actions

5.1 The company works with its suppliers to rectify any problems identified and implement improvements that are consistent with the provisions of the Base Code.

5.2 The company negotiates time-bound plans for improvements with suppliers and makes sure that the improvements are actually made.

5.3 The company provides support and advice to help suppliers make agreed improvements.

5.4 The Company recognises the fundamental importance of independent and democratic organisations of workers' own choosing – commonly known as trade unions – in achieving sustainable improvements and encourages an open and positive attitude towards trade unions and collective bargaining because they are the essential elements of all mature systems of industrial relations.

5.5 The company terminates supplier relationships where serious breaches of the Code persist only after reasonable attempts have been made to work with the supplier to implement improvements, and where there is no reasonable prospect of securing improvements. Such terminations should be carried out in a responsible way.

5.6 The company works with suppliers, other ETI members and other parties affected by its activities to address the root causes of non-compliances through the design and implementation of activities which identify and test good practice and effective solutions.

6. Transparency

6.1 The company reports fairly and accurately on its ethical trade activities.

6.2 The company complies with ETI reporting requirements.

6.3 The company reports publicly, and in more detail as its experience grows, on its commitments to ETI, its ethical trade activities and impacts.

6.4 The company encourages its suppliers to be transparent about their ethical trade performance.

6.5 The company responds rapidly, fully and openly to any complaints about code violations in its supply chain.

Ethical Sourcing

Third-Party Labour Providers Supplier Guidance

03 Charter

02 Policy

01 Requirement

09 Tool

Coles is committed to the responsible manufacture and provision of goods and services. The Coles Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions and establishes the minimum standards when supplying Coles. It is the supplier's responsibilities to achieve and maintain these standards and to enforce them within those parts of their supply chains involved in supplying Coles, including third-party labour hire providers.

Coles' guidance on third-party labour hire providers is provided for informational purposes only. This guidance 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, this guidance does not preclude the supplier from going beyond what is suggested.

Guidance

Labour supply chains can be complex, characterised by many informal actors operating without written contracts, meaning that poor recruitment practices may go undetected.

Coles understands third-party labour hire organisations provide an essential service to Coles suppliers, however they can also introduce human rights and workplace compliance risks into these supply chains. Coles wishes to support our suppliers in reducing these risks.

1 Labour Hire Governance

- 1.1 Suppliers should understand the legal operating conditions for labour providers in that country and sector and ensure that any system of licensing, certification or other regulation as required by law is properly complied with.
- 1.2 Suppliers should have a current, written legal agreement in place with their labour provider(s) that governs the terms of supply, including commercial arrangements which should either include or be in addition to a procedural Service Level Agreement detailing the operational processes that will apply between the two parties.
- 1.3 Suppliers should supply the labour provider with an accurate and appropriately comprehensive document in their local language describing the job role(s) to be undertaken including pay rates, the payment process, hours and regularity of work; the nature of the work offered; the obligations and expectations of workers.
- 1.4 Suppliers should require labour providers to make offers of work to workers by means of clear, written contracts and associated documents provided prior to commencement of work (or migration to the place of such work) in the workers' local language, such that workers have a free choice whether to accept or reject that offer of work without having to experience a detriment or fear of penalty. Contracts and documents should detail the terms and conditions of the service/employment and ensure that workers are able to understand the contract, through verbal or written means, taking account of the different languages spoken by and literacy levels of workers.
- 1.5 Suppliers should require the labour provider to maintain complete, current and historical personnel and payroll records (for seven years or as required by local law) for workers employed or engaged by the labour provider working for the supplier.
- 1.6 Suppliers should require that labour providers' workers have the right to terminate their contract with the labour provider and leave after giving reasonable notice without penalty or detriment.
- 1.7 Suppliers must ensure that they hold a record of all workers' names placed by the labour provider to work with the supplier on any day, that there is a system in place to ensure that the worker is the person named, and that the worker has undergone the approved recruitment process by the labour provider.

Ethical Sourcing

Third-Party Labour Providers Supplier Guidance

1.8 Suppliers must ensure that all workers placed by the labour provider to work at the supplier site on any day have the appropriate citizenship, visas or working rights that apply in the jurisdiction of the supplier site, and that there is a system in place to check and monitor this.

1.8.1 **In Australia**, this system should involve undertaking a search of the federal government's Visa Entitlement Verification Online (VEVO) system, and retraining records of all workers passport details, visa type and conditions, and VEVO check outcome.

1.9 Suppliers should undertake due diligence to verify the credibility and legitimacy in the appointment of labour providers.

1.8.1 **Good practice looks like** suppliers appoint and require the labour provider to appoint a named senior manager to ensure compliance with Coles' Ethical Sourcing Policy, establish management systems for delivering compliance to the policy, and maintain records demonstrating compliance.

1.8.2 **Best practice extends further** whereby the supplier requires annual independent third-party social audit of the labour provider which assesses compliance to the Coles Ethical Sourcing Policy and any relevant legislation.

1.8.3 **In Australia, best practice looks like** requiring all third-party labour providers to be StaffSure certified prior to awarding business.

StaffSure Labour Hire Certification

In Australia, to ensure that suppliers are only working with reputable labour hire providers, Coles recommends that suppliers engage StaffSure certified providers. StaffSure is an independent certification scheme which assesses third-party labour hire providers against six key risk elements:

1. **Fit and proper persons** own and run the labour hire business;
2. **Work status** remuneration to ensure workers receive minimum employment entitlements;
3. **Financial assurance** to operate the labour hire business sustainably;
4. **Safe work** for all workers;
5. **Immigration and visa** laws are complied with; and
6. **Accommodation** supplied by employers or clients is suitable and rent is fair.

Information about StaffSure is available on the website <https://www.staffsure.org/>; alternatively you can contact Coles Ethical Sourcing Team at EthicalSourcing@coles.com.au if you have queries about how the StaffSure program aligns with Coles' Ethical Sourcing Policy

Ethical Sourcing

Third-Party Labour Providers Supplier Guidance

2 Subcontracting, Forced and Bonded labour

- 2.1 Suppliers (including employees and representatives) must not accept any reimbursements, financial inducements or other amounts from any labour provider or other person involved in the recruitment process.
- 2.2 Suppliers should ensure that labour providers do not require workers to lodge deposits or withhold any guarantee money, 'runaway insurance', surety bond, commitment or membership or reservation fees, deposits or recruitment fee or sums from pay to enable or facilitate recruitment, discourage departure or other similar purpose.
- 2.3 Suppliers should require that the labour provider always allows workers to retain their passport, identity papers, visas and work permits. Labour providers and suppliers should retain photocopies of such documents for the purposes of verifying identity and legal right to work, and these documents need to be stored securely.
- 2.4 Suppliers should verify that migrant workers and those whose travel arrangements have been made with the assistance of the labour provider should be able to return home for any reason and at any time without fear of reprisal and without incurring extraordinary debt.
- 2.5 Suppliers should require labour providers not to subcontract the supply of workers at the supplier's sites to other labour providers without the prior authority of the supplier, so the supplier has assured that all labour providers used are in accordance with laws (as applicable) and in compliance with Coles Ethical Sourcing Policy.
 - 2.4.1 **Good practice looks like** developing annual workforce planning practices and provide timely and accurate forecasting of contingent labour requirements to the labour provider to enable adequate planning of recruitment activity and resourcing.
- 2.6 Suppliers should ensure that in sourcing and supplying workers, labour providers can positively demonstrate that they do not engage in, support or tolerate discrimination in employment including recruitment, hiring, training, working conditions, job assignments, pay, benefits, promotions, discipline, termination or retirement on the basis of race, colour, ethnic and national extraction, gender, marital status, sexual orientation, age, disability, pregnancy, religion, caste or social origin, political opinion, union (or non-union) membership or any other form of discrimination.

3 Health and Safety

- 3.1 Suppliers must provide a safe and hygienic working environment to labour providers' workers, taking adequate steps to fully document risk assessments and minimise the causes of hazards to prevent accidents and injury to health as far as is reasonably practical, including the free provision of appropriate personal protective equipment and safety equipment.
- 3.2 Suppliers should provide access to adequate medical assistance and facilities to labour providers' workers.
- 3.3 Suppliers should ensure that labour providers' workers receive adequate health and safety training and supervision as defined by risk assessments. This must include sufficient training and management in waste management, handling and disposal of chemicals and other dangerous materials. All health and safety training shall be comprehensible, regular and recorded and repeated as required so that labour providers' workers can demonstrate:
 - 3.3.1 Understanding of the job and the ability to perform it to at least the minimum standard required by the supplier; and
 - 3.3.2 Understanding of safe and healthy working practices relating to the job and working environment.
- 3.4 Suppliers must ensure that labour providers' workers are provided with free access to potable water, clean toilet facilities, sanitary facilities for food preparation and storage and (if appropriate) washing facilities.
- 3.5 Suppliers must ensure that, where accommodation for labour providers' workers is provided by the supplier or the labour provider, charges are reasonably aligned with the local accommodation market and do not exceed any laws. Suppliers must require the labour provider to provide evidence of their management processes to ensure accommodation provided is safe, clean and meets the basic needs of workers.

Ethical Sourcing

Third-Party Labour Providers Supplier Guidance

4 Payments, Wages, Benefits and Deductions

- 4.1 Suppliers should be able to demonstrate that an appropriate rate is paid to the labour provider that allows the labour provider to meet workers' statutory wage and social employment costs; labour sourcing and supply costs, business overheads, and a sustainable net margin, and records are maintained to demonstrate compliance.
- 4.2 Suppliers should require that the labour provider records and monitors all hours worked by all workers employed by the labour provider and placed at the supplier site.
 - 4.2.1 **Good practice looks like** an additional verification process which assures the accuracy of the information provided by the labour hire provider, demonstrating that the workers are paid at the appropriate rate for all the hours that they have worked.
 - 4.2.2 **Best practice extends further** whereby suppliers verify that the labour providers' workers' wages are paid directly to all workers in the form of cash or cheques or into the workers' nominated bank account, not to any third party, with workers having full and complete control over the monies they earn.
- 4.3 Where piece rates or task-rates are used, the supplier must verify that the rate is agreed in writing by each worker prior to work commencing or a changed rate being applied.
- 4.4 Where piece rates or task-rates are used, the supplier must ensure that the average competent worker can achieve or exceed the local minimum wage, or that the rate meets the relevant local wage conditions or Award rates.
- 4.5 Suppliers must verify that payslips are clear and that information relating to wages shall be available to the labour providers' workers in an understandable form.
- 4.6 Suppliers must verify that the labour providers' workers' wages are paid on time at the agreed intervals and in full without deduction other than required by law, or as permitted by the written agreement of the worker.
- 4.7 Suppliers should display the Coles Supply Chain Workers Hotline poster in lunch rooms, workers kitchens or communal areas. The poster is available to be downloaded for free via <https://www.coles.com.au/corporate-responsibility/sustainability/ethical-sourcing>.

Ethical Sourcing

Third-Party Labour Providers Supplier Guidance

Example Third-party Labour Hire Risk Checklist

Owner / Manager			
Property address			
Completed by:			
Date completed			
Labour hire governance			
Risk	Risk level	Verifiable evidence demonstrating risk mitigation <i>[Coles has suggested what documentation or process should be cited to verify risk mitigation. Use this column to record details of evidence cited]</i>	Completed Date
Do third-party labour providers have the relevant license or permit required to operate?	High	<i>[Documentation of valid licence or permit number is retained for all third-party labour providers]</i>	
Do suppliers have current, written legal arrangements in place with all third-party labour providers?	High	<i>[Copies of signed agreements with each third-party labour hire providers are retained.]</i>	
Is there a clear, written document describing the job roles(s) including pay rates, payment process, expected hours of work and the nature of the work offered?	Medium	<i>[Service Level agreement or other similar type document is available and signed by both parties]</i>	
Do suppliers require third-party labour hire providers to have written contracts with workers?	Medium	<i>[Clause in signed agreement with each third-party labour provider]</i>	
Do third-party labour hire providers retain personnel records for all workers for a minimum of seven years?	Medium	<i>[Clause in signed agreement with each third-party labour provider]</i>	
Do suppliers have a representative of their organisation responsible for the management of third-party labour providers?	Medium	<i>[Current position description of an employee whose responsibilities include managing third-party labour hire compliance]</i>	
Can labour hire providers verify the right to work in Australia for all workers?	High	<i>[Copies are retained of every workers' identification documents and VEVO checks]</i>	
Have the labour hire providers been independently assessed against a recognised standard?	Low	<i>[StaffSure certification has been attained by the third-party labour hire provider]</i>	
Subcontracting forced and bonded labour			
Risk	Risk level	Verifiable evidence demonstrating risk mitigation <i>[Coles has suggested what documentation or process should be cited to verify risk mitigation. Use this column to record details of evidence cited]</i>	Completed Date
Can suppliers ensure that third-party labour workers are not required to lodge a deposit or bond to gain employment?	High	<i>[Clause in third-party labour hire agreement, verified via random worker interviews and payslip check]</i>	
Do workers retain the original copy of their identification documents?	High	<i>[Clause in third-party labour hire agreement, verified via random worker interviews]</i>	
Can suppliers ensure that work is not being subcontracted by third-party labour providers at their site?	High	<i>[Clause in third-party labour hire agreement, verified via random worker interviews and timesheets]</i>	
Do labour hire providers have an anti-discrimination policy and hiring process?	Low	<i>[A copy of the labour hire anti-discrimination policy is retained]</i>	
Is there a labour hire management system in place which verifies the workers provided by the third-party labour hire organisation match the documentation?	Medium	<i>[Timesheets are available and verified by random worker interview assuring that those rostered on to work are present on site and all required documentation is available relevant to that worker]</i>	


Ethical Sourcing

Third-Party Labour Providers Supplier Guidance

Health and Safety			
Risk	Risk level	Verifiable evidence demonstrating risk mitigation <i>[Coles has suggested what documentation or process should be cited to verify risk mitigation. Use this column to record details of evidence cited]</i>	Completed Date
Has a risk assessment been recently completed identifying any hazards to workers?	High	<i>[Risk assessment is documented with actions taken to prevent accidents and injury]</i>	
Is there a trained First Aid officer available while workers are on site?	High	<i>[Valid first aid certificate and timesheets]</i>	
Are all workers provided with health and safety training prior to commencing work?	Medium	<i>[Training / induction records and timesheets]</i>	
Do all workers, including those provided by third party labour organizations, have access to the appropriate personal protective equipment [PPE] free of charge?	Medium	<i>[PPE register is available]</i>	
Are all workers provided with access to free potable water, clean toilet facilities and sanitary facilities for food preparation?	Medium	<i>[Site cleaning records are maintained, and water testing records are available if required]</i>	
Payments, wages, benefits and deductions			
Risk	Risk level	Verifiable evidence demonstrating risk mitigation <i>[Coles has suggested what documentation or process should be cited to verify risk mitigation. Use this column to record details of evidence cited]</i>	Completed Date
Is the supplier able to demonstrate that the amount paid to the third-party labour hire organisation is enough to cover workers legal entitlements, and business margin?	High	<i>[Calculation is available assuring that the labour hire invoice is adequate; e.g. [workers legal entitlements + relevant tax + superannuation] + business margin = labour hire invoice total]</i>	
Do third-party labour hire workers receive written payslips?	High	<i>[Clause in third-party labour hire agreement, verified via random worker interviews and payslip check]</i>	
Are workers' wages paid on time at agreed intervals and in full without any unauthorised deductions?	High	<i>[Clause in third-party labour hire agreement, verified via random worker interviews]</i>	
Are workers paid their legal entitlements including the appropriate rate per hour or piece, superannuation, any additional loading for casual or overtime hours, accrualment of all relevant leave entitlements, and all relevant tax is paid.	High	<i>[Verified via payslip review and random worker interviews]</i>	

Further information

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



03 Charter

02 Policy

01 Requirement

10 Tool

Ethical Sourcing

Sedex On-Boarding Guide



Contents

About Sedex	Page 4
Register Your Company on Sedex	Page 5
Pay for your membership	Page 8
Add Sites to an Existing Account	Page 10
Create Site Details	Page 11
Initiate a Customer Relationship	Page 13
Accept a Relationship Request	Page 14
Grant Coles Site Visibility	Page 15
Multiple Sites – Global SAQ	Page 16
Complete the Individual Site SAQ	Page 18
Site Risk Rating	Page 20
Audit Formats and Certification Bodies	Page 21



Contents

Upload an audit and close non-conformances	Page 22
Coles Relationship Linking Diagram	Page 24
Link to Indirect customer & Grant Site Visibility	Page 25
Link suppliers to customers	Page 28
Sedex Helpdesk and Coles contacts	Page 29

About Sedex

About Sedex:

- Global non-profit membership organisation, home to Sedex Advance - the world's largest collaborative platform for sharing responsible sourcing data on supply chains.
- Used by more than 38,000 members in over 150 countries
- Takes advantage of standardised formats, summary reports and collaborative working to help reduce supply chain risk.
- Continues to evolve and scale to meet the needs of a rapidly changing business environment.

Benefits:

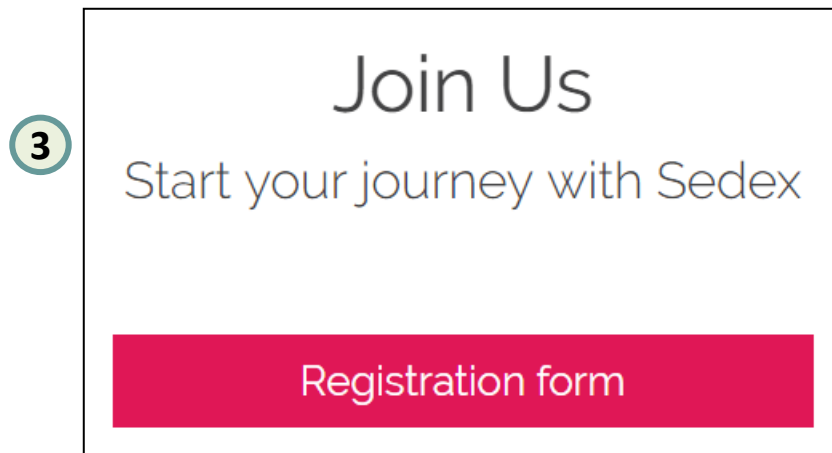
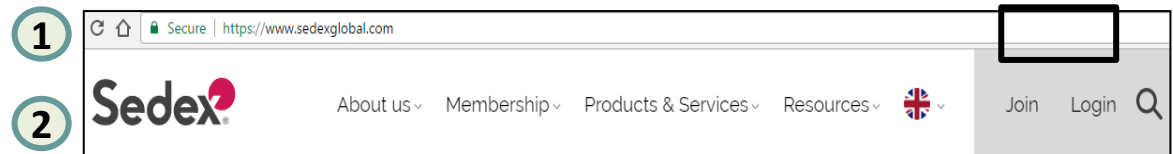
- **Avoids duplication:** simple and cost-effective way to share responsible sourcing information (e.g. self-assessment questionnaire and audits) with multiple buyers.
- **Secure and confidential:** suppliers retain full control over who can view their data.
- **Independent from any single standard or methodology:** enables members to bring⁸⁹ together different data, methodologies, standards and certifications.

Register Your Company on Sedex

1 Use Chrome as your internet Browser if possible. Go to <http://www.sedexglobal.com/>

2 On the top right of the homepage choose a language and click on **Join**

3 At the bottom of the next page opening, click on **Registration form**



Register Your Company on Sedex

4 Enter your email address and company name to receive login details.
Once you submit your details, you will receive an email from Sedex. This may take several days.

5 When you receive the email, click on the link in the email to proceed.
This link has an expiry of 48 hours.

6 Your email address will become your Login ID, and you will be asked to create a password. Please record these for later reference.

4

Registration

Email

Company name

Please do **NOT** register a new account here if you had an account on Sedex 2.0. Please ensure you have access to the inbox of the email address provided. We will send you a verification link by email.

After verification, you will be able to create your password and set up your account.

If you have already registered, please go to the Login page.

5

Welcome to Sedex Advance.


Thank you for completing the first step in the Sedex Advance user registration process. Please complete the next four steps so Sedex can activate your account:

Step 2 - [complete your profile details](#).

Step 3 - complete your Company details

Step 4 - you will be redirected to the login page.

6

User Verification 

USER INFORMATION

First Name

Last Name

Password *

Confirm Password *

Password rules

Your password must:

- be at least 8 characters in length
- contain upper and lower case letters
- contain at least one number or special character
- not be one you have used before
- not be a disallowed word (see below)

[disallowed words](#)

To access login page directly click on the link
<https://sedexadvance.sedexonline.com/sso/#/login>

Register Your Company on Sedex

7 For a basic Supplier account, select Company Type **Supplier (B) membership**. (If you would like to use Sedex to manage your own supply chain you may want to consider an AB Membership.)

AB membership is a higher cost option.

8 Complete all the details (compulsory fields are marked with *).

9 Read and accept the Terms and Conditions;

Click on Finish

7

8

9

The screenshot shows the 'Create Company' form on the Sedex website. The form is divided into three main sections: GENERAL INFORMATION, COMPANY INFORMATION, and BILLING INFORMATION. In the GENERAL INFORMATION section, 'Company Type' is set to 'Supplier (B Member)' and 'Status' is 'New'. The COMPANY INFORMATION section contains fields for 'Company Name', 'Address Line 1', 'Address Line 2', 'City', 'Country' (a dropdown menu), 'Post Code', 'Telephone', 'Main Contact' (with the email 'vishal.sedexglobal@gmail.com'), and 'Number of Sites'. The BILLING INFORMATION section is currently empty. At the bottom of the form, there is a light blue box containing links to 'Sedex Rules', 'Terms & Conditions', and 'Sedex Refund Policy', followed by a checkbox and the text 'Please check the checkbox to indicate that you have read, understood and agree to use the site with the rules, terms and conditions shown above.' Below this box are three buttons: 'Clear', 'Back', and 'Finish'.

Pay for Your Membership

- 1 Log in to your account via <https://sedexadvance.sedexonline.com/sso/#/login>
- 2 Go to Company > my company
- 3 Click on the button "Payments" on the top
- 4 Include in 'Number of sites' the total number of sites packing/ manufacturing for Coles.
If you want to pay for 1 year only, enter '1' in the 'Extend Subscription' field.
- 5 Click "Calculate" and then "Pay Now"

Dashboard Company Audit User

my company

View Company *i* **3** Edit Payments Create New Site Create New Supplier Site

GENERAL INFORMATION

Payments History

SUBSCRIPTION INFORMATION

Please enter the number of sites and years you would like to pay for

4 Number of Sites * 8

Extend Subscription by * 1 year(s)

Current Expiration Date 15/02/2020

New Expiration Date

5 Calculated Costs **Calculate**

Pay Now



A single site payment covers your Company and one manufacturing site.
Each additional site costs an extra site subscription fee

Pay Your Membership

- 6 You can pay online with a credit/ debit card via WorldPay or do a bank transfer (BACS)*
- 7 Click on “Credit/ Debit Card” to be referred to the WorldPay payments page – follow all steps on the WorldPay page
- 8 The status of your payment will be shown in your account

* A 4.5% administration fee will be charged on credit or debit card payments via Worldpay.

* BACS payments are subject to an administration fee of 10 GBP

6

Payment Details

You're about to purchase 2 year(s) of subscription for 8 site(s) of company _Sedex*Test_B Training Account which will cost you 960 GBP.

Please note payment fees:

- A 4.5% administration fee will be charged on credit or debit card payments. You will be redirected to the Worldpay website in order to make the payment. Worldpay is the secure 3rd party payment platform that we use for all card payments.
- A £10 administration fee will be charged on bank transfer payments

Please select one of the following payment options below to continue:


Bank transfer

Credit/ Debit Card

7

WorldPay

Help FAQs Security



Secure Payment Page







Please review your purchase details, then select a payment method to continue.

Choose currency £322.56 (Pounds Sterling)

Description 2 year(s) of subscription for 4 site(s) of company _Sedex_test_TomLegge_Supplier

Amount £322.56

Select your payment method

8

Your payment was successful. Thank you for your purchase!

Payment Reference	Summary	Amount	Administration Fee
ZP3302186	Subscription to 20 site(s) over 2 year(s)	1612.8 GBP	0 GBP

[Your company's status has been set to active.](#)

Add Sites to Existing Accounts

- 1 Go to Company / My Company and click on Payments
- 2 In the 'Number of Sites' field, enter the TOTAL number of sites you wish to have in your account, including new sites AND ones you have already paid for.
- 3 If you want to pay for 1 year only, enter '1' in the 'Extend Subscription' field.
- 4 Click "Calculate" and then "Pay Now"

1

Dashboard Company Audit User

my company

View Company ⓘ

Edit Payments Create New Site Create New Supplier Site

GENERAL INFORMATION

Payments History

SUBSCRIPTION INFORMATION

Please enter the number of sites and years you would like to pay for

2 Number of Sites * 8

3 Extend Subscription by * 1 year(s)

Current Expiration Date 15/02/2020

New Expiration Date

4 Calculated Costs Calculate

Pay Now

95

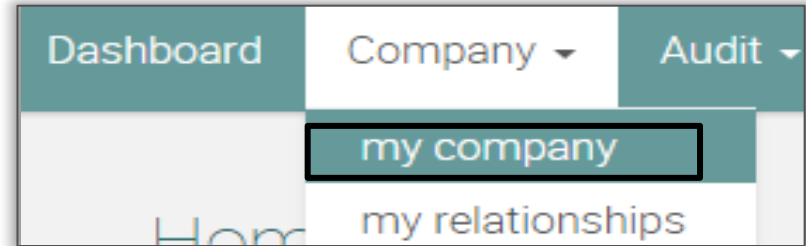
Create Site Details

- 1 Go to Company > my company and scroll to the bottom of the page
- 2 Click on 'Create New Site' (Do NOT click on 'Create New Supplier Site')
- 3 Complete all relevant details: Fields marked with "*" are compulsory



TIP: To select multiple site functions, click on all relevant options

1



2



3

SITE INFORMATION	
Site Name *	Company Site Ltd
Address Line 1 *	33 Main Street
Address Line 2	
City *	St Gallen
Country *	Switzerland
Post Code *	
Site Functions *	Service Provider, Labour P...
Administrator(s)	Service Provider ✓
	Labour Provider ✓
	Primary Producer (Agriculture) 96

Create Site Details

- 4 Choose your product areas – type in the product and click on “Search”
- 5 Select your product(s) by ticking the relevant boxes from the drop down menu.
- 6 Answer the survey questions and choose the worker types from the drop down menu – click on “Add New Worker Type” to add multiple types
- 7 Click on “Submit” to create the site in your account.
- 8 Repeat steps 1 to 7 for each site in your account

4

Product Area(s) * Plums Search

5

Product Area(s) * Plums Search

ADMINISTRATOR(S)

Add administrator(s)

Food Beverage and Tobacco Products

Canned or jarred fruit

☒ Canned or jarred plums

Canned or jarred organic fruit

☐ Canned or jarred organic plums

6

SURVEY QUESTIONS

Do you purchase products or materials from suppliers which are then traded with your customer(s)? ☐ No ☐ Yes

WORKERS INFORMATION

TYPE (Please select all worker types that apply)	MALE	FEMALE	ACTION
Please select...	0	0	Remove

Add New Worker Type

Cancel Clear Submit

7



TIP: To select multiple types of products, simply type in the new product name, click on “Search” again and select from the new drop down options.

Initiate a Customer Relationship

For suppliers initiating a relationship with Coles

- 1 Go to Company > My Relationships
- 2 Click on “Initiate a Relationship”
- 3 Type ‘Coles’ in the second text box titled ‘Target Company’.
- 4 Target Company is my Customer and type of Relationship is **Direct**.
- 5 Enter current date as Relationship Start Date.
- 6 Leave Customer Supplier Ref as blank.

Dashboard Company Audit User Reporting Risk Assessment Tool

My Relationships

my company
my relationships
my subsidiaries
search

Initiate a relationship Link suppliers to customers

RELATIONSHIP INFORMATION

My company or subsidiary *

Target Company * Coles (ZC3775515) Clear

Target company is my/my subsidiary's * ☒ Customer ☐ Supplier

Type of Relationship * ☒ Direct ☐ Indirect

Relationship Start Date DD-MM-YYYY

Customer Supplier Ref.

February 2017

Mon	Tue	Wed	Thu	Fri	Sat	Sun
30	31	01	02	03	04	05
06	07	08	09	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26

Cancel Submit

Accept a Customer Relationship

For accepting a relationship request from Coles

- 1 Go to Company > My Relationships
- 2 Click 'Accept' in the Action column next to the Coles relationship request

Dashboard Company Audit User Reporting Risk Assessment Tool

my company
my relationships
my subsidiaries
search

Initiate a relationship Link suppliers to customers

RELATIONSHIP INFORMATION

Customer or supplier

Customer/Supplier ☒ Customer ☐ Supplier ☐ All

Status ☐ Accepted ☒ Initiated ☐ Rejected

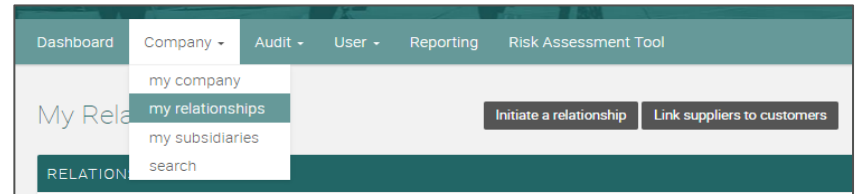
Relationship Type ☒ Direct ☐ Indirect ☐ Multi-Tier ☐ All

Apply Filters

CUSTOMER COMPANY NAME	SUPPLIER COMPANY NAME	VIA	RELATIONSHIP TYPE	REQUEST DATE	CUSTOMER SUPPLIER REFERENCE	STATUS	ACTION
Coles	Sedex*Test_B Training Account		Direct	17/02/2017		Initiated	Accept Edit View Reject
Coles	Sedex*Test_B		Direct	17/02/2017	REC 942610276	Initiated	Accept Edit View Reject

Grant Coles Site Visibility

- 1 Go to Company > My Relationships
- 2 Click 'Edit' in the Action column next to Coles
- 3 Click on the drop-down to view and select all sites supplying to Coles.
- 4 Select Contacts, Details, SAQ and Audit visibility.



CUSTOMER SUPPLIER REFERENCE	STATUS	ACTION		
	Accepted	Edit	View	Reject
reference	Accepted	Edit	View	Reject

EDIT RELATIONSHIP

Customer Company Reference: ZC3775515

Customer Company Name: Coles

Supplier Company Reference: ZC1075722

Supplier Company Name: _Sedex*Test_B Training Account

Relationship Type * ☒ Direct ☐ Indirect

Relationship Start Date: 17-02-2017

Customer Supplier Reference:

Site(s) Visibility Apple Farmer, BJN Industrial -

Apple Farmer ☒

BJN Industrial ☒

Site(s) Visibility

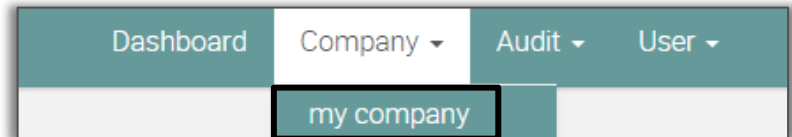
SITE NAME	DETAILS	CONTACTS	SAQ	AUDITS	REFERENCE
	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Setting up Global SAQ

For suppliers with multiple sites

- 1 Go to Company > my company
- 2 Click on the Global Self Assessment Questionnaire bar and the button 'Global SAQ'.

1

A screenshot of the 'My Company' profile page. At the top, there's a header with 'My Company' and an information icon, followed by buttons for 'Edit', 'Create New Site', 'Create New Supplier Site', and 'Payme'. Below this, the page is divided into several sections: 'GENERAL INFORMATION' (containing 'Company Reference' ZC3775515 and 'Company Type' Buyer/Supplier (AB Member)), 'COMPANY INFORMATION', 'BILLING INFORMATION', 'GLOBAL SELF ASSESSMENT QUESTIONNAIRE' (which contains a 'Global SAQ' button highlighted with a black box), and 'SITES INFORMATION'.

2

Setting up Global SAQ

For suppliers with multiple sites

- 3 Click on “Edit” to start with any of the sections / SAQ pillars.
- 4 Complete all sections.
- 5 Click on ‘Apply to all Sites’.

3 Global Self Assessment Questionnaire i

LABOUR
HEALTH AND SAFETY
BUSINESS ETHICS
ENVIRONMENT

Edit

5 Global Self Assessment Questionnaire i

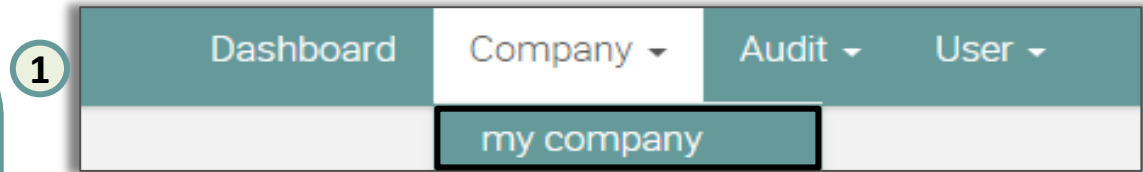
Apply to all sites Remove from all sites

102

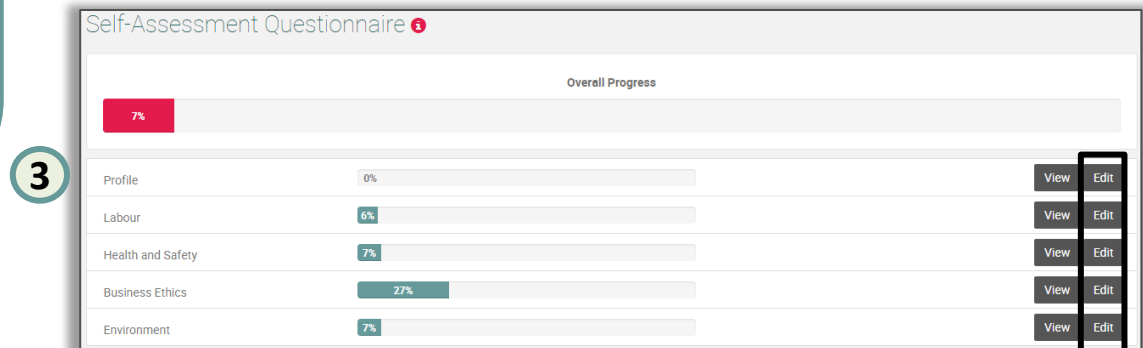
Complete Individual Site SAQ

For suppliers with multiple sites with different management policies

- 1 Go to Company > my company and scroll to the bottom for your sites' list page
- 2 Click on the button "Site SAQ" in the Action column for the relevant site
- 3 Click on "Edit" to start with any of the sections / SAQ pillars



SITE NAME	COUNTRY	GLOBAL SAQ APPLIED	ACTION
222222222222222222	Bulgaria	Not Applicable	
New Small Supplier 2	Australia	Not Applicable	
Sedex Shanghai	China	<input checked="" type="checkbox"/>	Site SAQ Initiate an Audit Delete



TIP: To select multiple answers from a drop down menu, press the "Ctrl" button on your keyboard and click on the applicable answers.

Complete Individual Site SAQ

For suppliers with multiple sites with different management policies

- 4 Complete all sections.
- 5 Click on “Save” to save your answers, then “Next” to go to the next set of questions or “SAQ Overview” to go back to the SAQ Overview page and continue with another pillar

The screenshot displays the 'WORKER HEALTH' section of the SAQ, which is currently at 0% completion. Below the section header, there are two questions: '20050273. Have you identified the potential risks to worker health and well being associated with your operations?' and '20050274. Do you have a programme to prevent/ reduce occupational health risks to workers?'. The first question has a dropdown menu with 'Yes' selected. The second question has a dropdown menu with 'Yes, we provide medical care to all employees' selected. Below the questions, there is a list of other sections: 'HOUSEKEEPING AND HYGIENE' (0%), 'HEALTH AND SAFETY MANAGEMENT' (17%), 'HEALTH AND SAFETY TRAINING' (0%), and 'EMERGENCY AND FIRE SAFETY' (0%). At the bottom of the page, there are four buttons: 'Previous', 'Next', 'Save', and 'SAQ Overview'. The 'Save' button is highlighted with a red box.



TIP: Please do remember to save your answers, as otherwise if you leave the page without saving or lose internet connection the information will be lost. If you need to stop and get more information, you can save and return to the SAQ later.

Site Risk Rating

- Sedex will produce a site risk rating for each site based on a combination of two factors: 1) the outcome of your site SAQ; and 2) the embedded inherent risk generated from Maplecroft data.
- Coles has visibility of these risk ratings and will enter them into Coles Fusion where suppliers are able to view them.
- If your site is rated **Low**, you will NOT be required to undertake an audit, simply to update your Sedex SAQ in 12 months.
- If your site is rated **Medium**, you will be required to arrange an audit, have the auditor upload it onto Sedex, and have all major and critical non-conformances closed by the auditor. An approved audit will lead to 24 months of site approval.
- If your site is rated **High**, you will be required to arrange an audit, have the auditor upload it onto Sedex, and have all major and critical non-conformances closed by the auditor. An approved audit will lead to 12 months of site approval.
- Coles will enter a due date in Coles Fusion by which Suppliers will need to book an audit. Suppliers will receive a notification from Fusion with audit details.

Audit Formats and Certification Bodies

- **Approved Audit Formats:**
- Coles prefers the Sedex SMETA (2 or 4 pillar) audit format, but will also accept a number of other formats. Further details regarding the applicable ethical audit requirements are available on Fusion.
- **Where to find an Auditor:**
- For certification bodies that can undertake a SMETA audit, and can upload audits into Sedex, please see this link:
- <https://www.sedexglobal.com/membership/auditor-membership/>

Upload Audit and Close Non-Conformances

Auditor to Complete

If required to undertake an audit, the approved auditing body needs to follow the below instructions.

- 1 Go to Company > My company
- 2 Click on Initiate an audit against the relevant site.
- 3 The auditor will see the following screen. The auditing body will need to complete each section, including the findings tab, and upload the full audit report and any other relevant attachments to Sedex.

2

SITE NAME	COUNTRY	GLOBAL SAQ APPLIED	ACTION
Test 1	Australia	<input type="checkbox"/>	Site SAQ Initiate an Audit Delete

3

Initiate an Audit

SITE INFORMATION

Site Reference	ZS3263888
Site Name	Test 1
Country	Australia

ADDITIONAL INFORMATION

Audit Conducted By *	<div>Please select...</div>
Audit Company (Name or Code) *	<div></div>
Is this a SMETA audit? *	<div><input type="radio"/> No <input type="radio"/> Yes</div>
Auditor to upload audit? *	<div><input type="radio"/> No <input checked="" type="radio"/> Yes</div>
Share SAQ	<div><input checked="" type="checkbox"/></div>

107

Upload Audit and Close Non-Conformances

Auditor to Complete

4 Once the submit button is clicked, the report is published and is visible to the customer. The audit is displayed on the following screen.

5 Once an audit has been uploaded to Sedex, the site must progress through any corrective actions.

6 The auditing body must then close-out (verify) any non-conformances, and upload supporting evidence on Sedex.

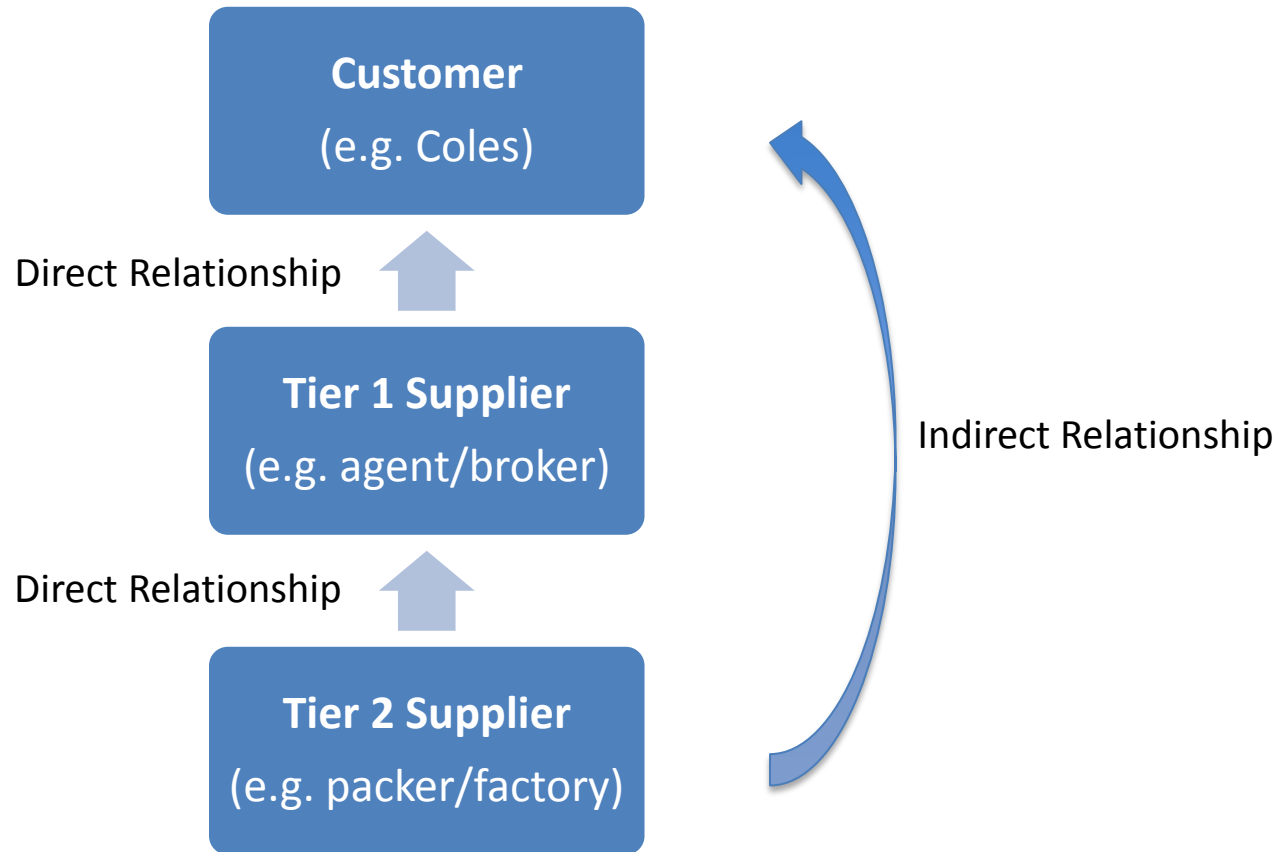
4

The screenshot shows the 'My Audits' interface. At the top, there's a header 'My Audits' with a red notification icon. Below it is a section titled 'AUDIT INFORMATION' with a dark teal background. This section contains several input fields: 'Audit Date From' and 'To' (both with 'DD-MM-YYYY' placeholders), 'Site/Supplier Name/Code', 'Country' (a dropdown menu with 'Please select...' text), and 'Audit Code'. An 'Apply Filters' button is located below these fields. Below the filter section is a table with the following columns: 'AUDIT CODE', 'SITE NAME', 'SITE REFERENCE', 'COUNTRY', 'TYPE', 'AUDIT DATE', 'STATUS', 'NON COMPLIANCES', and 'ACTION'. The table has one data row with the following values: 'ZAA3266308', 'Test 1', 'ZS3263888', 'Australia', 'Semi-announced', '01/01/2015', 'Published', and an empty 'NON COMPLIANCES' cell. In the 'ACTION' column, there are three buttons: 'Attachments', 'View Findings', and 'View Report'.

AUDIT CODE	SITE NAME	SITE REFERENCE	COUNTRY	TYPE	AUDIT DATE	STATUS	NON COMPLIANCES	ACTION
ZAA3266308	Test 1	ZS3263888	Australia	Semi-announced	01/01/2015	Published		Attachments View Findings View Report

As per Coles Ethical Sourcing Supplier Requirements, major non-conformances must be closed by the auditor within **4 months from the original audit date**.

Coles Relationship Linking Diagram

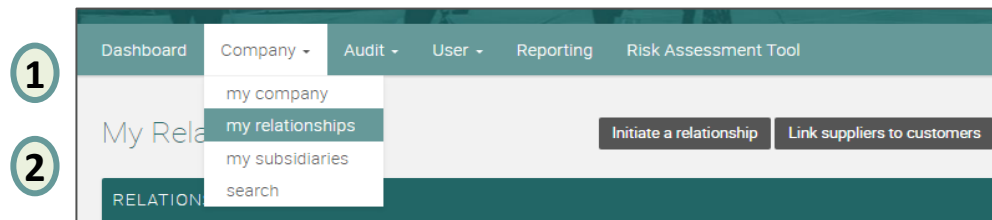


Link to Indirect Customers & Grant Full Site Visibility

For suppliers supplying to Coles via an agent or broker

Below mentioned steps are for Suppliers that have created a site of employment and have activated their account by making a payment. This step should be followed if the site supplies to Coles via an agent/ broker.

- 1 Go to Company > My Relationships
- 2 Click on “Initiate a Relationship”



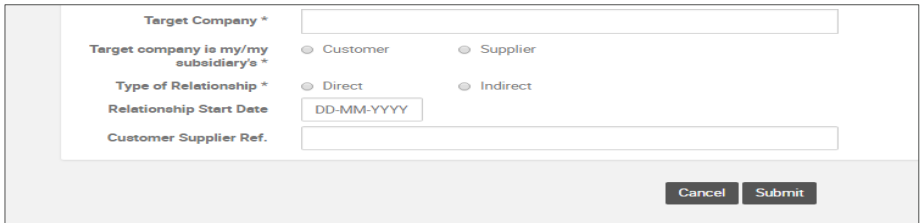
Link to Indirect Customers & Grant Full Site Visibility

For suppliers supplying to Coles via an agent or broker

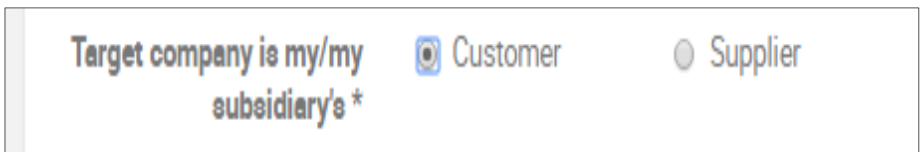
Steps to link and grant full Site Visibility

- 3 This is the window where you define your relationship with your indirect Customer.
 - a. Your company name appears in the first textbox.
 - b. Type 'Coles' in the second text box titled 'Target Company'.
 - c. Target Company is my Customer
 - d. Type of Relationship is **Indirect**.
 - e. Relationship Start Date is current date.
 - f. Leave Customer Supplier Ref as blank.

b



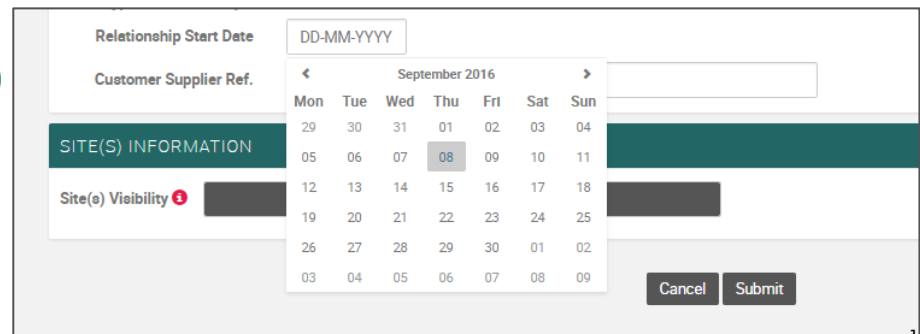
c



d



e



Link to Indirect Customers & Grant Full Site Visibility


For suppliers supplying to Coles via an agent or broker

Steps to link and grant full Site Visibility

- 4 Next to grant full site visibility in the same Window, look at the section titled Site Information.
- 5 Click on the drop down for site visibility.
- 6 From the dropdown, select the relevant sites. Once you have selected, you will see a tick for that site.
- 7 Next to grant site visibility, ensure that details, SAQ and audits are ticked for every site that is selected.
- 8 When all the steps have been completed, click on Submit.

5

Site(S) INFORMATION

Site(s) Visibility  Please select... ▾


- Test 1
- Test 2
- Test 3
- Test 4

Previous Next

Submit

6

Site(S) INFORMATION

Site(s) Visibility  Test 1 ▾


SITE NAME	SAQ	AUDITS
Test 1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Test 2	<input type="checkbox"/>	<input type="checkbox"/>
Test 3	<input type="checkbox"/>	<input type="checkbox"/>
Test 4	<input type="checkbox"/>	<input type="checkbox"/>

Previous Next

Submit

7

Site(S) INFORMATION


Site(s) Visibility  Test 1 ▾

SITE NAME	DETAILS	CONTACTS	SAQ	AUDITS
Test 1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Cancel Submit

8

Site(S) INFORMATION

Site(s) Visibility  Test 1 ▾

SITE NAME	DETAILS	CONTACTS	SAQ	AUDITS
Test 1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Cancel Submit

Link Suppliers to Customers

For suppliers that want to link their third party sites to Coles

This step should be followed if suppliers want to link their third party sites to Coles.

Steps to link suppliers to customer

- 1 Go to Company > My Relationships
- 2 Click on the button “Link suppliers to customers”
- 3 Select a customer and a supplier organisation from the lists and click on “Yes” to confirm the proposed indirect relationship, to be accepted both by the supplier and customer.

The screenshot displays the Coles Supplier Relationship Management interface. At the top, a navigation bar includes links for Dashboard, Company, Audit, User, Reporting, and Risk Assessment Tool. The 'Company' dropdown menu is open, showing options for 'my company', 'my relationships', and 'my subsidiaries'. The 'my relationships' option is selected. Below the navigation bar, the 'My Relationships' section is visible. On the right side of this section, there are two buttons: 'Initiate a relationship' and 'Link suppliers to customers'. The 'Link suppliers to customers' button is highlighted with a red box. Below this, the 'Propose a Relationship' section is shown, which includes two search bars: 'CUSTOMER ORGANISATION' and 'SUPPLIER ORGANISATION'. Each search bar has a 'Search' button next to it.



Additionally the supplier needs to set the access rights by clicking on Edit against the accepted link.

Sedex Helpdesk and Coles Contacts

UK Helpdesk

- tel. +44 (0)20 7902 2320
- email: helpdesk@sedexglobal.com

US/Canada Helpdesk

- tel. +1 888 487 6146
- email: helpdesk@sedexglobal.com

China Helpdesk

- tel. +86 (0)21 6103 1622
- email: helpdeskchina@sedexglobal.com

Coles Ethical Sourcing

- email: ethicalsourcing@coles.com.au

