

POLICY ON PREVENTING HUMAN TRAFFICKING, FORCED LABOUR, AND CHILD LABOR

Effective date: January 01, 2025

BACKGROUND

The purpose of this policy is to describe Penfold's commitments to comply with, and respect individuals' rights under, Human Trafficking, Forced Labor and Child Labor laws, and your responsibilities to help Penfold comply with these laws.

DEFINITIONS

"Child Labor" means labor that deprives children (generally all people under 14 years of age, subject to certain exceptions) of their childhood, their potential and their dignity, and that is harmful to physical or mental development. It includes work that (i) is mentally, physically, socially or morally dangerous and harmful to children, and (ii) interferes with their schooling.

Whether certain work constitutes harmful or illegal child labor varies from country to country and depends on, among other things, the child's age, the type of work performed, the number of hours worked and the conditions under which the child works. Child Labor does not include youth employment or student work, such as internships or apprenticeships, which comply with local laws and regulations.

"Forced Labor" means all work or service exacted from a person under threat or penalty (including slavery, servitude and forced recruitment), which includes penal sanctions and the loss of rights and privileges where the person has not offered himself or herself voluntarily.

"Human Trafficking" means the act of recruiting, harboring, transporting, providing or obtaining a person for forced labor or commercial sex acts through the use of fraud, coercion (e.g., threats of serious harm or physical restraint or abuse or threatened abuse of the legal system) or deception.

"Human Trafficking, Forced Labor and Child Labor laws" means the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (the "Palermo Protocol," supplementing the United Nations Convention against Transnational Organized Crime of 2000), the European Convention on Human Rights (1953), the Council of Europe Convention on Action Against Trafficking in Human Beings of 2005, the Forced Labour Convention of 1930 (No. 29) and Abolition of Forced Labour Convention of 1957 (No. 105), the EU Directive on Preventing and Combating Trafficking in Human Beings (2011/36/EU), the EU Directive Regarding Disclosure of Non-Financial and Diversity Information (2014/95/EU), the Minimum Age Convention, 1973 (No. 138), the Worst Forms of Child Labour Convention, 1999 (No. 182), the United Nations Global Compact, and laws in all countries where Penfold conducts business.

1. POLICY STATEMENT

Penfold and its employees do not (i) tolerate, engage in or support Human Trafficking, Forced Labor or Child Labor of any kind through Penfold's activities, including in its supply chain, or (ii) assist Penfold clients or any other party in doing so.

Penfold respects its employees' rights to agree to terms and conditions of employment voluntarily without coercion, and freely terminate their employment on appropriate notice.

Penfold ensures that its employees are of legal working age for their position and complies with local laws for youth employment or student work, such as internships or apprenticeships.

All Penfold employees shall remain vigilant during visits with clients and service providers as to potential violations of this policy. Penfold may further arrange spot compliance checks at client offices on unannounced basis and such compliance checks may be undertaken as spot checks as part of normal business meetings or material inspections rather than formal announced audits.

2. VIOLATIONS OF THIS POLICY AND RAISING CONCERNS

It is your responsibility to immediately report to senior Penfold personnel if you witness, encounter, or otherwise learn of any violation of this policy at or by any Penfold existing or prospective client, supplier, or service provider.

Penfold shall immediately suspend business with any client immediately upon learning of credible allegations of that such client is engaging in or otherwise supporting Human Trafficking, Forced Labor or Child Labor, pending further investigation. Should such allegations be proven to true, Penfold shall immediately cease, or refuse to commence, as the case may be, all business activities with such client.

Penfold takes this policy very seriously and violations may lead to disciplinary action up to, and including, termination of employment. While Penfold retains discretion as to how to respond to any violation of this policy, any disciplinary process will be undertaken in accordance with all applicable local laws and other legal requirements