

CODE OF BUSINESS ETHICS

PURPOSE

Brick Lane Brewing is committed to making a positive contribution to our community and to the environment in which we operate by developing and implementing business practices that allow us to deliver financial success whilst conducting our business strategy and operations in a responsible manner. In doing this, we seek to create value for our shareholder and our broader stakeholders, including our employees, our business partners and the communities in which we operate.

All employees of Brick Lane are to be treated with respect, and their health, safety and basic human rights must be protected and promoted.

This Code of Business Ethics ("Code of Ethics") sets out the principles that Brick Lane Brewing complies with. All suppliers and sub-contractors shall be made aware of this Code of Ethics and shall be expected to comply with the provisions of the code or meet the same standard through their own Code.

We expect our suppliers to support this process fully and to encourage their own suppliers to work to these principles as well. To ensure adherence to and continual improvement against the Code of Ethics, Brick Lane Brewing reserves the right to visit and assess our suppliers' commitment to our Code of Ethics.

Code of Business Ethics

The provisions of the Code of Ethics constitute minimum and not maximum standards, and the Code of Ethics should not be used to prevent others from exceeding these standards. The Code of Ethics, and any application of the provisions, must be interpreted to comply with national and other applicable law. In the event the Code of Ethics exceeds the protections offered under the national or other applicable law, the provisions of the Code of Ethics shall apply.

Employment

All employees shall be free to choose their employment and shall not be forced to work against their will:

- There shall be no forced, bonded or involuntary prison labour or human trafficking.
- Employees shall not be required to pay to work but must provide proof of eligibility to work.
- No original identity papers shall be retained by the employer.
- All employees shall be free to leave their employment after reasonable notice.

Working conditions are safe and hygienic

All employees are provided with a safe and hygienic working environment:

- 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.
- Employees shall receive regular health and safety training, and such training shall be recorded and repeated for new or reassigned employees.
- Records shall be kept of accidents, injuries and known exposure to health and safety risks at work in accordance with relevant legislation.

- Access to clean toilet and sanitary facilities and to potable water shall be provided and shall be adequate for the employee numbers.

Wages

- Wages and benefits paid for a standard working week shall meet, at a minimum, national legal standards.
- All employees shall be provided with written and understandable information about their employment conditions including wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

Working Hours

- Working hours shall comply with all national laws and benchmark industry standards, whichever affords greater protection.
- Employees shall be given reasonable breaks while working and sufficient rest periods between shifts.

No Child Labour

No child under the age of 16 shall be employed. Young person's 16 years of age and less than 18 years of age shall not be employed in any work that is likely to interfere with the young person's education or to be harmful to their health or physical, mental, spiritual, moral or social development. Brick Lane will comply with all federal and state laws relating to the employment of young persons, including but not limited to:

- Children, Youth and Families Act 2005 (Vic)
- Child Employment Act 2003 (Vic)
- Australian Human Rights Commission Act 1986 (Cth)
- Hospitality Industry (General) Award 2020

Freedom of association and the right to collective bargaining are respected

- Employees, without distinction, shall have the right to join or form trade unions of their own choosing.
- No employee shall be dismissed solely because of their affiliation to a trade union.
- There shall be an open attitude towards the activities of trade unions and their organisational activities.
- Employee representatives shall not be discriminated against and shall have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

No discrimination is practised

- There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on but not limited to race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Regular Employment is provided

- To every extent possible, work performed must be on the basis of recognised employment relationships established through national law and practice.
- Obligations to employees under labour or welfare laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, 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.

No harsh or inhumane treatment is allowed

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

Bribery is not permitted

- Bribery shall not be permitted under any circumstances.
- A bribe must never be offered, promised, given, asked for or accepted.
- Bribes can include payments or anything of value, that are intended to influence someone or induce them to act improperly.
- Facilitation payments are also prohibited.
- Agents, consultants and other service providers must also not make corrupt payments on Brick Lane Brewing's behalf.
- Gifts, complimentary arrangements, hospitality, entertainment or favours which might place you under an obligation or could reasonably be viewed as improperly influencing business transactions must not be accepted.

Anti-money laundering

- Everyone is expected to comply with money laundering prevention laws.
- Payment for goods or services performed under contract in travellers cheques, third party payments or money orders is not permitted.

Fraud

No employee should engage in any kind of fraudulent activities. Fraud means deliberately deceiving a person or company to unjustly obtain an unauthorised benefit, such as money, property or services. This includes, but is not limited to:

- Theft of funds, inventory or any other asset
- Manipulation of accounting information or financial statements
- Making false expense reports
- Misuse or forgery of any documents (eg records, data, accounts, contracts or expense claims)

Reporting concerns

- Everyone is encouraged to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected.

- Concerns should be raised directly to Line Managers, People & Culture, or to another senior member of Management.
- Any employee, who in good faith, raises a complaint or discloses an alleged breach of the Code, whilst following correct reporting procedures, will not be disadvantaged or prejudiced. All reports will be dealt with in a timely and confidential manner.
- You can report externally to 1800 551 155 which is an external hotline and reporting service independently monitored by EY.

Compliance

Brick Lane Brewing expects co-operation from all employees in conducting themselves in a professional, ethical and socially acceptable manner of the highest standards. Any employee failing to comply with the provisions of the Code of Business Ethics may be subject to disciplinary action which could result in their immediate suspension or the termination of their employment.

In relation to our suppliers, we believe that transparency is vital to a successful business relationship. We are committed to building long-term relationships with suppliers and value open and honest communication with them. In the event of non-compliance, we expect our suppliers to be committed and engaged in remedying the issue within a time-frame set out in a corrective action plan to be agreed with the supplier. Brick Lane Brewing reserves the right to terminate any agreements should a supplier decide that compliance with this Code is impossible or where a supplier shows repeated disregard for the provisions of this Code.

Management

Brick Lane Brewing is committed to ensuring confidentiality in respect of all matters raised under this Code, and that those who make a report in good faith are treated fairly.

RELATED POLICIES

This document should be read in conjunction with Brick Lane's Code of Conduct and Whistle Blower Policy.

FOR MORE INFORMATION

If you have any questions about the content of this policy or require further information, please do not hesitate to contact your Manager, our People & Culture Manager or a member of the Brick Lane Brewing Management Team.

Failure to comply with these policies and procedures will be treated seriously by Brick Lane and can lead to dismissal, particularly if the breach is serious, amounts to illegal conduct or is a repeated breach. Other disciplinary action that may be taken includes, but is not limited to, issuing a formal warning, directing people to attend mandatory training, suspension from the workplace and/or permanently or temporarily denying access to all or part of Brick Lane Brewing's computer network.



REVIEW

Brick Lane commits to updating its Policies from time to time as the business evolves and grows, and in accordance with Company requirements or where legislation may change.

This policy will be regularly reviewed by Brick Lane and any necessary changes will be implemented by Brick Lane Brewing management team.