

Brambles

Corporate Social Responsibility Policy

Brambles Limited

Revised: 1 January 2020

Version 2.0

CORPORATE SOCIAL RESPONSIBILITY POLICY

Introduction

Brambles is a leading global support services provider with operations worldwide.

This Corporate Social Responsibility (“**CSR**”) Policy was adopted by the Board of Directors of Brambles in June 2003 and has been communicated to all our employees. We are committed to implementing it on an ongoing basis.

This policy is a summary of more detailed policies on these and other areas which are referenced in Brambles’ Code of Conduct. The Code of Conduct provides an ethical and legal framework for all employees in the conduct of Brambles business. It is about how we relate to our customers, employees, shareholders, suppliers and the community. A copy is published on our website (www.brambles.com).

Brambles is committed to reporting and communicating openly on its response to CSR issues.

This policy will be reviewed from time to time and updated as necessary to reflect developments in our businesses and in best practice.

Business Integrity

All Brambles’ employees are expected to conduct business so as to enhance the Group’s reputation. The overriding principles which should govern our behaviour and business dealings are:

- All business should be conducted in accordance with the laws and regulations of the countries in which the business is located.
- We compete fairly in the markets in which we operate.
- Corrupt practices are unacceptable. No bribes, kickbacks, or similar payments will be made to, or accepted from, any party.
- Employees must not engage in activities that involve, or could appear to involve, a conflict between their personal interests and the interests of Brambles.
- Employees who come forward in accordance with the Speak Up Policy when they have genuine suspicions of wrongdoing anywhere in the organisation will be taken seriously and will not be victimised. They may raise their concerns with their line manager, any member of the Legal or Human Resources Teams or through the Speak Up hotline. Their concerns will be properly investigated and any necessary action taken.
- Brambles does not make political donations.

Environment

We value the natural environment and are firmly committed to sound environmental practice in our operations. Our businesses are required to comply with relevant environmental laws and regulations and to adopt the following principles:

- Follow Brambles’ Zero Harm Charter and commit and contribute towards sound environmental practices in our daily operations.
- Improve the efficiency of our use of raw materials and energy.
- Minimise emissions and waste.
- Respond to community concerns with integrity, honesty and respect.

- Seek out suppliers who have a proactive approach to environmental risk management and who manage natural resources responsibly.

People

The enterprising spirit of our employees is one of our great assets. Employees should be treated justly and fairly and rewarded for their achievements. Our employment policies commit us to:

- Providing a safe working environment through best practice in health and safety management in all our businesses.
- Being an equal opportunities employer, committed to developing a diverse workforce where everyone is treated fairly irrespective of race, sex, colour, nationality or national origin, class, religion, age, disability, marital status, sexual orientation or gender identification, political opinion, or any other status protected by applicable law.
- Creating an environment where everyone is encouraged to give their best and realise their full potential, through the provision of learning and development opportunities.
- Ensuring that employees can discuss any problem connected with their work confident that they will receive a fair, impartial and confidential review of the issue.

We respect the individual's right to freedom of association. We relate to our employees through both collective and individual agreements, according to local law, custom and practice.

Community

- We aim to make a positive contribution to the communities in which we operate and to be a responsible neighbour.
- Our businesses will determine their community investment priorities to suit the needs of their local communities.
- Our CommunityReach programme encourages our employees to be active in the community, allows reasonable requests for volunteering time and provides financial support for community projects.

Human rights

We support and uphold the principles contained in the Universal Declaration on Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. In particular we will not tolerate child labour or any form of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour, any any form of human trafficking, in our own operations or those of our suppliers.

Suppliers

We are committed to being a responsible and valuable partner in the supply chain, continuing to build a sustainable business that serves its customers, employees and shareholders and the communities in which they live.

A strong and dynamic supplier base is essential to our long- term success. We rely on the expertise and skill of suppliers to meet customers' changing needs, and we only work with suppliers that comply with all applicable laws, including all applicable labour, employment, human rights, wage and hour, environmental, and health and safety laws.

We are committed to working with suppliers to develop more efficient, safer and sustainable supply chains by abiding by the principles and values outlined in the Code of Conduct and Zero Harm Charter.

Responsibility for the Success of this Policy

The Brambles' Board has overall responsibility for this CSR Policy. The Head of Legal has day-to-day operational responsibility for this policy and should ensure that all employees receive regular and appropriate training.

The Head of Legal, in conjunction with the Board, will review this policy from a legal and operational perspective at least one a year. This policy does not form a party of any employee's contract, or otherwise create one, and it may be amended from time to time. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments or suggestions should be addressed to the Head of Legal.

All employees are responsible for the success of this policy. Brambles creates workplaces in which open and honest communications among all employees are valued and respected. If you have any questions about this CSR Policy, or if you would like to report a potential violation of it, please speak to your line manager, any member of the Legal or Human Resources Teams, or the Speak Up Hotline. Consistent with Brambles' Speak Up Policy, no reprisal or retribution will be taken against any employee for raising concerns under this policy. Brambles is committed to investigating, addressing, and responding to concerns of employees and to taking appropriate corrective action in response to any violation.