



INTRODUCTION

Comvita is the global brand and market leader in Mānuka honey and bee products, selling Mānuka honey, and other bee and olive leaf extract products globally. Our purpose is working in harmony with bees and nature in New Zealand to heal and protect the world.

Comvita seeks to do business in a way which embraces science and nature, shows respect and care for heritage and our place, and restores balance. Our aspirations, and the commitment Comvita is making to safeguard our environment for the future, are articulated through the Māori world view of Kaitiakitanga (guardianship or protection).

This philosophy of environmental stewardship underpins all Comvita business and decision-making, including:

1. The quality, safety, and efficacy of our products.
2. The health, safety, and wellbeing of Comvita people - embracing diversity and offering equal opportunities within the workplace.
3. The way Comvita does business - protecting and healing the environment for future generations to come - and advocating for a future where people and bees can thrive together.
4. A commitment to positive outcomes for people, communities, all stakeholders, and nature.

Comvita expects our suppliers to share our commitment to a fair, safe, responsible, and sustainable approach to business.

PURPOSE

The purpose of this Supplier Code of Conduct (the Code) is to provide minimum standards and expectations applicable to all suppliers providing goods and services to Comvita globally.

APPLICATION OF THE CODE

Suppliers, whether directly or through their supply chain, are required to comply with all relevant legislation, and to adhere to the principles detailed in the Code as a condition of doing business with Comvita.

The standards of this Code are in addition to, and not in lieu of, provisions of any legal agreement of contract between the supplier and Comvita.



The scope of the Code includes Suppliers' parents, affiliates, subsidiaries, and subcontractors. Comvita expects our suppliers to understand fully and actively manage their own supply chains.

Comvita acknowledges that achieving the principles set out in the Code will be an ongoing and collaborative process. Comvita requires suppliers at a minimum to:

1. Meet the principles of the Code or have established a clear goal toward meeting the principles contained in the Code.
2. Actively review, monitor, and modify their management processes and business operations to ensure alignment with the principles in the code.
3. Communicate quickly and transparently with Comvita should they become aware of a material departure from the principles of the Code and what steps will be taken to address, remedy and prevent repetition of such departures.
4. Similarly communicate with Comvita should their level of compliance with the Code improve or increase, providing supporting information.
5. Provide annual data on greenhouse gas emissions and set greenhouse gas reduction plans. Comvita accepts that suppliers may still be on a journey to provide this but requires a formal commitment from suppliers that they will move towards providing this information, providing at least annual activity data to calculate emissions and updates on progress towards achieving this requirement.

Comvita reserves the right to verify compliance with the Code and will require suppliers to cooperate and provide supporting evidence upon request. This may involve self-assessment by the supplier, fulfilling a request for further information, and/or site visits or audits by Comvita or our agents.

Comvita will review this Code regularly to ensure it accurately reflects best practice.



PRINCIPLE 1 – PRODUCT & SERVICE QUALITY

Comvita expects our suppliers to support our total commitment to delivering safe and high quality products to our customers. Suppliers must:

- 1.1. Comply with all relevant regulatory legislative and regulatory requirements in supplying the goods and services.
- 1.2. Comply with any product or other specifications for the products and services as communicated by Comvita.
- 1.3. Immediately notify of Comvita of any breach of requirements, particularly where finished product quality may be impacted. The supplier must work with Comvita to appropriately manage the impact of any such breach and also take appropriate steps to prevent such breach re-occurring.

PRINCIPLE 2 – HEALTH & SAFETY

Comvita is committed to ensuring the health, safety and wellbeing of all employees and contractors. Suppliers must:

- 2.1. Comply with all relevant health and safety legislative requirements.
- 2.2. Provide a safe and secure work environment for employees, visitors and third parties by:
 - a. managing and mitigating risk;
 - b. employing safe systems of work; and
 - c. providing employees and contractors with appropriate training in safe work practices.
- 2.3. Maintain a Health and Safety policy and system, with records of their compliance and performance, which is available on request.

PRINCIPLE 3 – ENVIRONMENTAL SUSTAINABILITY

Comvita is committed to environmental sustainability and leaving the world in a better place. Suppliers must:

- 3.1. Comply with relevant regulations, legislation, and environmentally responsible business practices.
- 3.2. Seek to maximize the efficient use of energy, water and other resources and minimize waste, pollution, and impact on biodiversity.
- 3.3. Provide annual activity data on greenhouse gas emissions (or to calculate such emissions) and commit to annual greenhouse gas reduction plans and reporting.
- 3.4. Understand their significant environmental impacts and risks and share data and analysis on these and quantified timely improvement activities.



PRINCIPLE 4 – HUMAN RIGHTS

Comvita expects suppliers to comply with international standards for human rights, to provide acceptable working conditions and to comply with relevant labour laws. Suppliers must:

- 4.1. Comply with all relevant human rights legislation in respect of their employees and business operations.
- 4.2. Conduct their business activities in a manner which respects human rights as set out in the United Nations Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organisation.
- 4.3. Promote an inclusive and respectful workplace where ethnicity, religion, age, sexual orientation, gender, pregnancy, parenthood, and disability are no impediment to recruitment, promotion, and ongoing employment.
- 4.4. Provide a workplace that is free from all forms of direct and indirect discrimination, harassment, and bullying, and ensure this commitment extends to all aspects of workplace relations. Ensure that all work is undertaken without coercion.
- 4.5. Not engage in practices relating to forced and compulsory labour at any stage of the manufacturing or service delivery process. All workers must be of the required local legal age throughout the supply chain.

PRINCIPLE 5 – RESPONSIBLE & ETHICAL BUSINESS

Comvita expects suppliers to be responsible, honest, transparent, and ethical in their business activities and not engage in corrupt practices or anti-competitive behaviour. Suppliers are expected to commit to sound governance and management to ensure business integrity and continuity. Suppliers must:

- 5.1. Conduct their business in full compliance with relevant competitor, fair trading, and antitrust legislation at all times. Not engage in fraud, bribery, or corrupt conduct. Suppliers will appropriately declare conflicts of interest. We expect our suppliers to work with us to ensure we compete fairly.
- 5.2. Not improperly use private, confidential, or commercially sensitive information regarding any party in the supply chain.
- 5.3. Be prepared to share information about their extended supply chain with Comvita, including where products and materials are sourced.
- 5.4. Maintain transparent and accurate financial and business records to demonstrate compliance with relevant laws and regulations, as well as generally accepted accounting practice.
- 5.5. Consider their continuity plan to minimize business disruption from unplanned events.
- 5.6. For bee products, we expect our suppliers to either adopt the Comvita Bee Welfare Code (Appendix 1) or adopt a set of equivalent practices in line with the principles and intent.



APPENDIX 1 – COMVITA BEE WELFARE CODE



Bee Welfare Code

Outcome

At Comvita we value our partnership with our bees and we are committed to doing everything we can to identify, develop, implement and promote bee welfare outcomes aligned to international best practice. All animal welfare is underpinned by a set of ideals known as the five freedoms:

- freedom from hunger, malnutrition and thirst;
- freedom from fear and distress;
- freedom from heat stress or physical discomfort;
- freedom from pain, injury, and disease; and
- freedom to express normal patterns of behaviour.

The Comvita Bee Welfare Code captures how we turn these ideals into operating principles and best practice at an operational level.

Principles

To achieve the desired outcomes for bee welfare we have committed to operating principles which guide our actions.

1. Ensure our teams have adequate training, a safe work environment, and are well supported so they can focus on being good beekeepers
2. Plan our activity and design our tasks such that our interaction causes minimal adverse response from the bees toward the beekeeper and achieves the 'five freedoms' outcomes
3. Our choice of actions will create the least disruption to the colony while maintaining optimal health outcome and colony strength (best beekeeping practices).



Best Practice

Adherence to our operating principles is demonstrated by our actions, especially the choices we make. Many beekeeping tasks can be performed in different ways. Best practice comes from choosing the best option or developing new ways of working that align to our operating principles and deliver good bee welfare outcomes.

The following points are the agreed operational standards toward achieving best practice at Comvita.

1. **Safety:** all activities are carried out in accordance with the relevant health and safety policies and procedures.
2. **Work Plan:** Each hive inspection will consider nutrition requirements, health status, condition relative to milestone objectives, and any intervention necessary. Detailed annual apiary plans must include inspection frequency, milestone objectives, and an integrated pest management plan (IPM).
3. **Site Selection:** ensure apiary sites offer suitable resources, shelter and access while avoiding obvious hazards to people, bees and product. Avoid overstocking resulting in stress to bees and lower productivity. Consider protection from large livestock, e.g. electric fences.
4. **Transport:** hives are transported at night or in cool conditions. Hive entrances are blocked, hives are covered and secured. Manipulation of hives is avoided immediately before or after transport to reduce additional stress. Wet supers shall also be covered when transported to avoid robbing.
5. **Weather:** hives are not opened in unfavourable weather conditions.
6. **Smokers:** the correct use of smokers calms bees and keeps them out of harms way when manipulating hives.
7. **Harvest:** escape boards are installed pre-harvest and honey supers are removed early in the day before the colony becomes active. Blowers are not to be used.
8. **Varroa:** approved methods of varroa monitoring (alcohol wash, sugar shake, CO₂) shall be used to monitor treatments, determining risk to the colony and any intervention required.
9. **AFB:** the requirements of the AFB Pest Management Plan will be adhered to as they are legal obligations under the Biosecurity Act 1993. All colonies are under the supervision of a DECA holder.
10. **Requeening:** underperforming queens place the colony at risk and will be replaced when identified with queens chosen for their genetic traits (temper, natural resistance to diseases, hygienic behaviour)
11. **Maintenance:** to prevent a build-up of disease, brood frame replacement should occur within three years. All hive hardware needs to be maintained in an appropriate condition, or otherwise replaced.

Continuous Improvement

We acknowledge we can always do better. Comvita's Bee Welfare Code will develop and improve as our team refine techniques, technology advances, or new science emerges. We therefore encourage suggestions from our beekeepers on how to make our Bee Welfare Code even better.