

RETAIL FOOD GROUP

Sustainability Policy

Owner	Board of Directors
Policy (including changes) approved by	Board of Directors
Direct questions on Policy to	CEO and or Chairperson (from time to time) of RFG's Sustainability Committee
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1. Purpose

RFG recognises the importance of implementing sustainable strategies to equitably meet *Our* current needs without jeopardising the ability of future generations to meet their own needs. *We* recognise that *We* can do this by taking appropriate steps to preserve and protect the ecosystem, natural resources and people impacted by *Our* business and supply chain.

This *Policy* demonstrates *RFG's* commitment to:

- Promote a culture of *Sustainability* within its business;
- To reduce *Our* environmental footprint and enhance the *Sustainability* of *Our* business and supply chain;
- Support our *Franchise Partners*, *Master Franchise Partners* and *Supply Partners* to adopt socially responsible practices and environmentally conscious decision making in their own businesses;
- Raise awareness of, and thereafter embed, appropriate principles concerning *Sustainability* amongst *Our* business; and, to
- Develop and integrate *Sustainability* measures as a key indicator of *RFG's* future performance.

This *Policy* should also be read with *RFG's* Environmental Statement (a copy of which is posted to the *Group's* intranet and on *RFG's* website at www.rfg.com.au)

2. Scope

This *Policy* applies to all *Workplace Participants* and is intended to apply to *Franchise Partners*, *Master Franchise Partners* and *Supply Partners*. To the extent that it does not, *We* are committed to ensuring future arrangements with those parties requires compliance with this *Policy*.

This *Policy* operates in conjunction with other policies or codes adopted by *RFG* relating to standards of behaviour and conduct. It is subject to change at *Our* discretion and does not form part of any contract of employment, industrial instrument or commercial contract or agreement.

In the case of inconsistency between this *Policy* and the law, the law prevails. If local laws, codes of conduct or other regulations in a particular country or jurisdiction are more restrictive than this *Policy*, then *Workplace Participants*, *Franchise Partners*, *Master Franchise Partners* and *Supply Partners* operating in that country or jurisdiction must fully comply with those more restrictive requirements. In the case of *Workplace Participants*, where there is any inconsistency between this *Policy*, other policies or individual agreements, then the terms of this *Policy* prevail.

3. Policy Statement

We recognize the challenges and opportunities that environmental sustainability poses for the communities in which We operate. We acknowledge our responsibility to help protect the planet and are committed to building a more sustainable and inclusive world by minimizing the impact of Our activities on the environment. We are motivated to become a leader in sustainable practices and to fostering a culture of ethical behaviour and social responsibility that inspires others to work towards a more socially responsible and environmentally conscious world.

4. Definitions

In this *Policy*, words in italics have the following meanings:

<i>Board</i>	The board of <i>Directors</i> of <i>RFG</i> from time to time.
<i>CEO</i>	Means the <i>CEO</i> or other top ranking executive officer of the <i>Group</i> , regardless of title, from time to time.
<i>Company Secretary</i>	Means <i>RFG</i> 's company secretary from time to time.
<i>Continual Improvement</i>	Means the recurring process of enhancing the <i>Group</i> 's policies, procedures and other activities to achieve improvements in overall environmental performance consistent with the objectives of this <i>Policy</i> .
<i>Director</i>	A <i>director</i> of a <i>Group</i> member.
<i>Employee</i>	Full-time, part-time, casual and temporary employees of the <i>Group</i> .
<i>Environmental Impact</i>	Means any change to the environment, whether adverse or beneficial, wholly or partially resulting from an element of <i>RFG</i> 's activities, products or services.
<i>Franchise</i>	Means the right to operate a business identified by or associated with a brand or other intellectual property owned by the <i>Group</i> .
<i>Franchise Partner</i>	Means a person or entity who has been granted a <i>Franchise</i> by a member of the <i>Group</i> .
<i>Group</i>	Means <i>RFG</i> , its controlled entities and related bodies corporate.
<i>Master Franchise</i>	Means the right, within a designated territory or region, to manage or operate a network of outlets, and or grant <i>Franchises</i> to others, associated with a brand or other intellectual property owned by a member of the <i>Group</i> .
<i>Master Franchise Partner</i>	Means a person or entity who has been granted a <i>Master Franchise</i> by a member of the <i>Group</i> .

<i>Policy</i>	This <i>Sustainability Policy</i> .
<i>RFG</i>	Means Retail Food Group Limited.
<i>Supply Partner</i>	Means any person or entity which is the source of goods or services or is otherwise involved or participating in <i>Our</i> supply chain, including their employees, agents, contractors and subcontractors.
<i>Supply Partner Code</i>	Means the Supply Partner Code of Conduct <i>We</i> have adopted which <i>We</i> ask our <i>Supply Partners</i> to comply with.
<i>Sustainability</i>	Means operating and behaving in a manner which equally considers environmental responsibility alongside social and financial responsibility, to meet the needs of the present and create a foundation for future generations to meet their own needs.
<i>We, Us or Our</i>	Means a reference to <i>RFG</i> and or the <i>Group</i> (as the case requires).
<i>Workplace Participants</i>	All officers, <i>Employees</i> and contractors of the <i>Group</i> .
<i>You</i>	' <i>You</i> ' and ' <i>Your</i> ' refers to a <i>Workplace Participant</i> , <i>Supply Partner</i> , <i>Franchise Partner</i> or <i>Master Franchise Partner</i> (as the case requires).

5. Sustainability Objectives:

We recognise that *Our* business relies on a thriving ecosystem to supply the natural resources *We* need to serve our *Franchise Partners*, *Master Franchise Partners*, *Workplace Participants* and customers.

We are committed to building a more sustainable business that develops and embraces *Sustainability* practices that benefit future generations together with the communities in which *We* operate.

We are committed to investigating, and where appropriate implementing and maintaining, effective systems, controls and other measures to achieve these outcomes, including in relation to the following:

- Conducting risk assessments to determine material risks of *Environmental Impacts* occurring within *Our* business or supply chain;
- Engaging with key *Supply Partners* to assess material risks of *Environmental Impacts* occurring in their business and supply chains;
- Ensuring *Sustainability* is considered in the development of strategies and business plans;

- Developing a more efficient, economical and effective approach to procurement, which may include:
 - Life cycle assessment of products and the evaluation of *Our Supply Partners* for social responsibility and ethical conduct;
 - Effective management of resource consumption to improve product utilisation, efficiency and financial performance;
 - Developing, implementing and committing to more responsible sourcing protocols;
 - Maximising recyclable/recoverable/compostable content;
 - Minimising waste, water consumption and greenhouse gas emissions;
 - Better conserving energy and water;
 - Developing effective action to contribute to the minimisation of habitat destruction and environmental degradation, particularly in connection with coffee bean and flour production;
 - Reducing, or where feasible eliminating, the use of single-use plastics in *Our* business;
 - Contributing to the creation of an improved environment that better protects human rights within *RFG's* supply chain and workplace;
 - Developing enhanced governance in connection with the traceability, accountability, reporting and equitable procurement of products and services; and
 - Developing enhanced accountability and transparency in connection with *RFG's* procurement processes and *Our* impact on the environment, society and the economy;
- Improving awareness of this *Policy* and its objectives via the provision of training and support to key internal and external stakeholders;
- Complying with all relevant laws and reporting obligations in relation to environmental and *Sustainability* matters;
- *Continual Improvement* of *Sustainability* practices and outcomes via setting and striving to achieve appropriate environmental objectives for *Our* business;
- Pursuing innovative solutions to help achieve *Sustainability* objectives;
- Partnering with the community to respond to identified needs for a sustainable future; and

- Providing leadership in relation to *Sustainability* within the retail food franchising industry.

Additionally, *Our Workplace Participants* have a responsibility to:

- Read, be aware of, and to comply with, this *Policy*;
- Be vigilant, and to report any breaches or suspected breaches of this *Policy*; and to
- Participate in all training which may be provided in connection with this *Policy* or *Our Sustainability* initiatives more generally.

6. Sustainability Committee & Environmental Statement:

In addition to the objectives outlined in this *Policy*, *We* have:

- Established *Our Sustainability Committee* to identify, and where able, implement and oversee, new initiatives, systems and controls that will better help *Us* to achieve the objectives outlined in this *Policy* and to play a more constructive role in contributing to the development of a more socially responsible and environmentally conscious world; and
- Have adopted *Our Environmental Statement* to further demonstrate *Our* commitment to driving enhanced *Sustainability* in *Our* business and supply chain.

7. Reporting Violations or Suspected Violations

All *Workplace Participants* have a responsibility to promptly report any violation of law or policy.

We are committed to ensuring *Workplace Participants, Supply Partners, Franchise Partners and Master Franchise Partners* have a safe, reliable and confidential way of reporting suspicious activity. All *Workplace Participants, Supply Partners, Franchise Partners and Master Franchise Partners* who believe that a violation of this *Policy* or any applicable laws have been committed or is being planned, are encouraged to immediately report the matter to the *CEO* or *Company Secretary*, or to take advantage of the procedures and protections provided for in *RFG's Whistleblower Policy*.

All material breaches of this *Policy* shall be promptly advised to the *Board*.

8. Distribution & Training

This *Policy* shall be distributed to all *Workplace Participants* and will be posted on *RFG's* intranet and website. To the extent applicable to their roles, *Workplace Participants* will be provided training in connection with this *Policy* or any change or update of it.

9. Links with Other Documents

This *Policy* has been adopted in addition to (without limitation) the following policies, procedures, codes of conduct and or statements of intent:

- *RFG's Environmental Statement;*
- *RFG's Code of Conduct;*
- *The Supply Partner Code;*
- *RFG's Whistleblower Policy;*
- *RFG's Anti-Bribery & Corruption Policy;*
- *RFG's Diversity Policy; and*
- *RFG's Policy Regarding Modern Slavery Practices.*

10. Review

The *Board* is committed to regularly reviewing this *Policy* for effectiveness. This *Policy* may only be amended with the approval of the *Board*.