

Social Responsibility

ETHICAL SOURCING POLICY

BREVILLE USA, INC

Breville Group Limited and its subsidiaries ("Breville")

Purpose

Breville Group Limited and its controlled entities (collectively "Breville") is committed to conducting business in a socially responsible manner and strives to manage its business in a way that reflects high ethical and moral values. Breville expects its vendors to respect and adhere to the same philosophy in the operation and management of their businesses. Breville reserves the right not to do business with vendors that do not share and demonstrate Breville's commitment in this regard.

Breville's Ethical Sourcing Policy comprises the minimum requirements and expectations with which all Breville vendors ("Vendors") must comply in order to do business with Breville. Vendors are responsible for compliance with this Ethical Sourcing Policy by their personnel and subcontractors.

1. Labour

1.1 Child Labour

Vendors will comply with the minimum employment age defined by national law, or by the International Labor Organization ("ILO") Convention 138, whichever is higher. The ILO Convention minimum employment age is the last age, locally determined, of mandatory schooling, but not less than 15 years of age, subject to exceptions allowed by the ILO and national law.

1.2 Wages, Benefits, Working Hours and Transparent Record Keeping

Vendors shall engage only workers who are legally authorized to work in Vendors facilities. Vendors are responsible for validating personnel's and subcontractors' eligibility to work through appropriate documentation. All direct employment shall be voluntary; workers shall be free to leave work or terminate their employment. Obligations to personnel under labour or social security laws and regulations arising from a regular employment relationship shall not intentionally 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 seek to be intentionally avoided through the excessive use of fixed-term contracts of employment. In the case of employment through third party labour agencies, Vendors shall comply with Convention No. 181 of the International Labor Organization on Private Employment Agencies to the extent applicable. Vendor's employees must be provided with wages and benefits that comply with national laws as well as binding collective agreements, including those pertaining to overtime work and other premium pay arrangements. Vendor must not apply unlawful discrimination in employment and remuneration practices. Vendor must ensure that personnel work in compliance with all applicable laws pertaining to regular working hours and overtime hours, including those applicable to breaks, rest periods, holidays, and maternity and paternity leaves.

At all times under this Ethical Sourcing Policy, Vendor shall maintain accurate and transparent records.

1.3 Forced/Bonded Labour

Under no circumstances shall Vendor use, or in any other way benefit from, forced labour. "Forced Labour" means any work or service performed involuntarily under threat of physical or other penalty, such as prison, indentured or bonded labour. Further, Vendor shall respect the freedom of movement of its workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other coercive action to prevent workers from terminating their employment.

1.4 Discrimination

Vendor shall not discriminate in hiring and employment practices on the basis of any unlawful criteria. All conditions of employment should be based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, or personal beliefs. Vendor should seek to ensure that it provides an environment where its personnel can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour. As required by applicable law, Vendor shall respect the privacy rights of its personnel whenever it gathers private information or implements employee monitoring practices.

1.5 Harassment and Abuse

Vendor will seek to provide a workplace free from harassment, including, without limitation, physical, sexual, verbal or visual behavior that creates an offensive, hostile, or intimidating environment.

1.6 Freedom of Association

To the extent required by law, Vendor shall respect the rights of its employees to lawfully associate (including for collective bargaining purposes), or not to associate with groups of their choosing.

1.7 Health and Safety

Vendors shall seek to provide personnel with a safe and healthy working environment. For example, potable drinking water, adequate lighting, temperature, ventilation, sanitation, and personal protective equipment should be provided. In addition, facilities must be constructed and maintained in accordance with the standards set by applicable laws.

2. Environment

Vendors shall comply with all applicable legal environmental requirements. Vendors will meet all relevant local and national environmental protection laws, and will seek to comply with international environment protection standards. Vendors shall obtain all required environmental permits and registrations. Vendors shall identify hazardous materials, chemicals and substances, and ensure their safe and legal handling, movement, storage, recycling, reuse and disposal. All applicable laws and regulations related to hazardous materials, chemicals and substances will be followed. Vendors shall comply with material restrictions and product safety requirements set by applicable laws and regulations. Vendors shall ensure that key employees are aware of and trained in product safety practices.

3. Business Integrity

Vendors shall comply with all applicable ethical trade laws and regulations in the countries where materials are sourced, produced and incorporated into Breville product (country of use). In case of services, the location of service delivery shall prevail. Vendors must never, directly or through intermediaries, offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third party. Vendors will not pay or accept bribes, arrange or accept kickbacks and shall not take any actions to violate any applicable anti-bribery

laws and regulations including the U.S. Foreign Corrupt Practices and the UK Bribery Acts.

Vendors shall maintain transparent and up to date books and records to demonstrate compliance with applicable materials, services, governmental and industry regulations. Vendors shall be able to promptly disclose all the sources of primary origins (country of origin) associated with deliveries made. Breville reserves the right to ask Vendors to create, at a point in time, full supply chain mapping back to origin, to facilitate assessment of upstream supply chain compliance. Vendors are expected to report to Breville any situation that poses a conflict of interest, and disclose to Breville any Breville personnel or representative known to Vendors who may have an interest of any kind in Vendor's business, or any kind of economic ties with Vendor.

4. Compliance with Law

Vendors must comply with the legal requirements of the countries in which they operate. All requirements under this Ethical Sourcing Policy are in addition to compliance with applicable local laws. Vendors are responsible for obtaining knowledge of all relevant laws and regulations of the countries in which it operates.

5. Compliance with our Ethical Sourcing Ethical Sourcing Policy

Breville will have the right to monitor Vendor's compliance with this Ethical Sourcing Policy. Breville, or its representatives, may visit Vendor's facilities (including its factories) to ensure compliance with this Ethical Sourcing Policy. Vendor is required to cooperate with the entire monitoring process.

6. Reporting Violations

Vendors shall report to Breville any suspected violations of regulations, laws and this Ethical Sourcing Policy. Violations shall be reported to the Vendor's contact at Breville, Breville legal (generalcounsel@breville.com.au) or can be reported confidentially using one of the available channels:

Web URL: AskUs@BrevilleUSA.com

Hotline: +1 866.273.8455