promobrands

Inspire. Create. Impact.

Environmental, Social & Governance Framework

Our commitments across the products we source, our supply chain, our people and our operations.

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Promo Brands Pty Ltd · ABN 95 121 254 724 · Noble Park North, Victoria

Contents

1. Purpose and scope

Promo Brands supplies promotional products to distributors and agencies across Australia and New Zealand. This document sets out how we manage our environmental, social and governance (ESG) responsibilities — across the products we source, the suppliers we buy from, our people, and our own operations.

It is written for our customers and partners, and for the corporate clients they serve, who increasingly and rightly ask what their suppliers stand for. It is a working commitment rather than a marketing statement: it describes what we do now, what we are working towards, and how we hold ourselves to it.

This framework applies to all Promo Brands operations, our staff and the suppliers we buy from.

2. A message on our commitment

The products we supply are made, packed, freighted, used and — eventually — disposed of. Every stage of that chain has an environmental and social footprint, and we are one link in it. We take that seriously.

We are not going to claim to be something we are not. What we commit to is straightforward: to understand our impacts, to buy from suppliers who treat their workers properly, to reduce waste and emissions where it is practical, to run a fair and safe workplace, and to answer our customers' ESG questions with evidence rather than slogans. This framework is how we deliver on that — and how our partners can hold us to it.

3. What working with Promo Brands means

ESG is central to how we support our distributor and agency partners — not a box to tick. For the corporate accounts our customers serve, responsible sourcing and sustainability are now part of the buying decision. Working with us should make that easier, not harder:

- **Answers you can pass on —** when your client asks about ethical sourcing, sustainability or modern slavery, we give you the credentials and product information to answer with confidence — including for tenders and RFIs.
- **Ready for supply-chain reporting —** as more of our customers report their own value-chain (Scope 3) emissions, we work to provide the product and emissions information they need from us as a supplier.
- **Credible sustainable options —** we are honest about what our products are made of and how they can be disposed of, so you can offer a sustainable choice without the greenwashing risk.

- **Risk managed on your behalf —** our supplier due diligence protects your reputation as well as ours. A problem in the supply chain is a problem for everyone who touched the product.

4. Environmental

Our environmental impact sits across four areas: the products we source, how they are packaged, how they are freighted, and how we run our own site.

These commitments are guided by our Environmental Policy, which commits us to setting annual environmental objectives and targets and reviewing them each year, to preventing or minimising pollution across air, water, land, flora, fauna and heritage values, and to positively influencing the environmental performance of our partners.

4.1 Sustainable products and product lifecycle

We commit to:

- building and clearly labelling a range of lower-impact products — recycled-content, recyclable, reusable, FSC-certified paper, and locally decorated options — so our partners can offer a credible sustainable choice to their clients;
- providing accurate product information (materials, country of origin, certifications, recyclability) rather than vague "eco" claims that expose our customers to greenwashing risk under Australian Consumer Law;
- favouring, over time, suppliers who can substantiate the environmental claims they make about their products.

4.2 Packaging

Packaging is one of the most visible environmental impacts in our category. We commit to:

- progressively reducing unnecessary packaging on the products we import and dispatch;
- preferring recyclable and recycled-content packaging materials in our warehousing and despatch operations;
- working towards the intent of the Australian Packaging Covenant (APCO) and the national packaging targets.

4.3 Freight and emissions

Inbound sea and air freight and outbound domestic distribution are the largest parts of our carbon footprint. We commit to:

- selecting freight and carrier partners on service, cost and — where it is a genuine differentiator — environmental performance, and reviewing those arrangements regularly;
- consolidating shipments and improving container and load efficiency to reduce freight movements per unit sold;
- building the data needed to estimate our Scope 1, 2 and eventually Scope 3 emissions, so we can answer customer emissions requests.

4.4 Energy, waste and our own operations

At our Noble Park North site we commit to:

- progressing on-site solar generation to reduce grid electricity use and operating cost;
- reducing energy use in warehousing, lighting and decoration equipment as assets are replaced;
- minimising and responsibly clearing obsolete and discontinued stock — through structured clearance, donation or recycling rather than landfill;
- recycling cardboard, paper and soft plastics from our warehouse and office operations.

4.5 Climate-related risks

Climate change has the potential to affect our business in several ways beyond greenhouse gas emissions. As an importer and distributor, our operations rely on resilient global supply chains, dependable freight networks and stable operating costs.

Key climate-related risks include:

Risk	Potential impact	Our response
Supply chain disruption	Manufacturing delays, reduced product availability	Diversify suppliers, monitor higher-risk regions and maintain supplier due diligence
Extreme weather	Port closures, shipping delays, transport disruptions	Business continuity planning and flexible logistics arrangements
Freight cost increases	Higher import and domestic distribution costs	Improve shipment consolidation and freight efficiency
Energy price volatility	Increased warehouse operating costs	Invest in solar generation and energy-efficient equipment
Changing customer expectations	Increased demand for emissions and sustainability data	Improve ESG reporting, product information and emissions measurement
Regulatory change	New climate reporting or environmental obligations	Monitor legislative developments and update our approach as requirements evolve

We review these risks as part of our broader business risk management process and will continue to strengthen our resilience as our business and the regulatory landscape evolve.

5. Social

Our most material social risk sits in the supply chain we buy from; our most direct social responsibility is to the people who work for us.

5.1 Ethical sourcing and modern slavery

As an importer, we accept that the goods we buy carry a real risk of exploitative labour somewhere in their manufacture. We do not treat this as a formality. We commit to:

- maintaining and publishing a Modern Slavery Statement, approved at CEO level, that sets out our risk assessment, supplier due diligence, training and reporting;
- expecting our suppliers to meet basic labour standards — no forced, bonded or child labour; lawful wages and hours; safe working conditions; freedom of association — and reserving the right to stop buying from suppliers who will not meet them;
- using recognised tools such as Sedex membership and SMETA audits, alongside supplier self-assessments, to gain visibility of conditions in our supply chain, and responding promptly when issues surface;
- maintaining a supplier code of conduct that sets these expectations in writing;
- giving our partners and their corporate clients a clear, honest account of our modern slavery due diligence on request — including in tender and RFI responses.

5.2 Our people and workplace

We commit to:

- paying our staff correctly and lawfully, meeting our obligations under the Fair Work Act and the applicable modern awards, and keeping pay and entitlements current as award rates change;
- providing a safe workplace under our Occupational Health and Safety Policy — built on the ISO 45001 framework — including recording and investigating incidents and near misses, and ongoing consultation with our workers;
- supporting a workplace free from discrimination, bullying and harassment, and investing in our people's development, culture and engagement.

5.3 Product safety and consumer protection

The products we supply end up in the hands of the public. We commit to:

- ensuring the products we sell meet the mandatory safety standards and labelling requirements that apply to them under Australian Consumer Law;
- meeting the specific regulatory requirements of regulated product categories — for example, therapeutic goods requirements for promotional sunscreens — before those products are offered;

- acting quickly and transparently if a product safety or quality issue arises.

5.4 Community

Where practical, we support the communities we operate in through the responsible donation of surplus and end-of-line stock, in preference to disposal.

6. Governance

Governance is how we make sure the commitments above are actually managed, and how we run the business honestly.

6.1 Business ethics and integrity

We commit to:

- dealing honestly with customers, suppliers and staff, and competing on the merits;
- prohibiting bribery, corruption and improper inducements in any of our dealings, onshore or offshore;
- managing conflicts of interest transparently and providing a safe route for staff to raise concerns.

6.2 Quality and management systems

Our quality and workplace-safety management systems are built on the ISO 9001 (quality) and ISO 45001 (occupational health and safety) frameworks, supported by our Quality Policy and Occupational Health and Safety Policy. We commit to meeting or exceeding the standards set in our client agreements, contracts, codes and statutory obligations, and to continually improving how we deliver.

6.3 Supplier due diligence

Because our main ESG exposures sit with our suppliers, supplier due diligence is central to our governance. We commit to:

- assessing new suppliers for ethical, safety and compliance risk before we begin buying from them, not only on price and lead time;
- holding suppliers to our supplier code of conduct and reviewing higher-risk suppliers periodically;
- keeping records of supplier assessments so we can demonstrate our due diligence to customers and, if required, regulators.

6.4 Data privacy and information security

We hold customer, supplier and staff information. We commit to:

- handling personal information in line with our obligations under the Privacy Act 1988 and the Australian Privacy Principles;
- maintaining sensible information-security controls over our systems, and responding appropriately to any data incident.

6.5 Risk, compliance and oversight

We commit to:

- meeting our tax, payroll, workplace, consumer-law and industry obligations, and keeping compliance current as the law changes;
- treating ESG risks as part of our normal business risk management rather than a separate exercise;
- reporting ESG performance and material issues to executive management and, where relevant, the board.

7. Regulatory landscape

We monitor the Australian ESG-related regimes relevant to our business. Two points are worth stating plainly. First, several of these regimes do not yet directly bind a business of our size because of reporting thresholds — but the obligations of our larger customers reach us today through their supplier requirements, and we support them accordingly. Second, the rules in this area are actively changing, and we review our position each year.

Regime	What it does	How we respond
Modern Slavery Act 2018 (Cth)	Requires entities with A$100m+ consolidated annual revenue to publish an annual modern slavery statement. A 2023 review recommended lowering the threshold and adding penalties; the government has retained A$100m for now and appointed an Anti-Slavery Commissioner.	Mandatory reporting does not currently apply to us at our size, but we voluntarily maintain and publish a Modern Slavery Statement and support our reporting customers' supplier requirements.
Mandatory climate reporting (AASB S2 / ASRS)	Phased climate-related financial disclosure under the Corporations Act — Group 1 from Jan 2025, Group 2 from Jul 2026, Group 3 from Jul 2027 (entry thresholds under review).	We review our applicability each year and are building the emissions data our larger customers need for their own Scope 3 reporting.
Australian Consumer Law (ACCC)	Mandatory product safety standards and labelling, and prohibitions on misleading conduct — including misleading environmental ("greenwashing") claims.	Products we supply must meet safety standards, and any sustainability claim we make must be accurate and substantiated.
Fair Work Act & Modern Awards	Minimum pay, entitlements and conditions for employees, including under awards such as the Graphic Arts, Printing and Publishing Award.	We keep pay and entitlements correct and current as award rates change.
Privacy Act 1988	Governs handling of personal information under the Australian Privacy Principles.	We handle customer, supplier and staff data in line with these obligations.
Packaging (APCO / national targets)	Industry scheme and national targets for recyclable, reusable or compostable packaging.	We factor recyclability and reduction into our packaging choices.

This summary reflects our understanding of the position as at 2026 and is provided for information; it is not legal advice. We monitor these regimes and update our approach as they change.

8. Our commitments and roadmap

This framework is only meaningful if it drives action. The priorities below turn our commitments into a practical sequence. They are deliberately achievable rather than aspirational.

Horizon	Focus	Actions
Now (0–6 months)	Foundations and customer-readiness	Publish this framework alongside our existing policy suite. Confirm and refresh our Supplier Code of Conduct. Provide a short ESG summary for customer RFI and tender responses.
Near term (6–12 months)	Sourcing and data	Roll out supplier ESG assessment for new and higher-risk suppliers. Label a defined sustainable product range. Begin capturing energy and freight data for emissions estimates. Progress on-site solar.
Medium term (12–24 months)	Measurement and reduction	Produce a first emissions estimate (Scope 1–2, key Scope 3). Set practical reduction and packaging targets. Confirm any future climate-reporting applicability and prepare accordingly.

8.1 Quantitative targets

Alongside the roadmap above, we track ourselves against the following measurable targets:

- 100% of new suppliers assessed for ESG risk before we begin buying from them.
- 100% Supplier Code of Conduct acceptance across our active supplier base.
- 25% reduction in warehouse electricity use by 2030, against FY26 baseline (baseline figure to be confirmed following energy audit).
- 90% of warehouse cardboard recycled.
- On-site solar installation completed by 31st December 2026.
- Zero serious workplace injuries.

9. How we measure progress

We track a small, honest set of indicators rather than a large one. Indicative measures include:

- proportion of active suppliers with a completed ESG / ethical-sourcing assessment;
- number of products in the labelled sustainable range, and their share of sales;
- estimated Scope 1 and 2 emissions, and grid electricity offset by on-site solar once installed;
- value and destination of cleared obsolete stock (recycled, donated, landfill);
- award-compliance and payroll accuracy, and workplace safety incidents;
- number of customer ESG / modern slavery requests answered.

10. Governance of this framework

The General Manager owns this framework and is accountable for its implementation, reporting to the Chief Executive Officer. It is reviewed at least annually, and sooner if a regulatory change or a material customer requirement makes that necessary.

This framework sits above and is supported by our underlying policies: our Environmental Policy, Occupational Health and Safety Policy, Quality Policy, Modern Slavery Statement, and Supplier Code of Conduct. Where those policies go into more detail, they take precedence on their subject matter.

About Promo Brands

Promo Brands is an Australian promotional products wholesaler supplying distributors and agencies across Australia and New Zealand. We help our partners inspire their clients, create standout branded merchandise, and make a real impact — responsibly.

Company	Promo Brands Pty Ltd
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