

Modern Slavery Policy

Policy statement

Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, involving adults or children, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain (**modern slavery**).

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our own business or in our supply chains.

We expect the same high standards from all our contractors, suppliers and other business partners within our supply chains. As part of our contracting processes, we include specific prohibitions against modern slavery and include due diligence processes to ensure modern slavery risk is identified, assessed, addressed and where appropriate, remediated. We expect that our suppliers will hold their own suppliers to the same high standards.

This policy (including any updates) must be complied with and incorporated into the procedures of our own business and our supply chains.

This policy is to be read in conjunction with our Whistleblower Policy attached at **Error! Reference source not found..**

This policy applies to all persons working for us or on our behalf in any capacity, including (but not limited to) employees at all levels, directors, officers, seconded workers, interns, contractors, external consultants, supply chain participants and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Minimum modern slavery standards

The minimum modern slavery standards expected of our own business, employees and supply chain include:

- Comply with relevant modern slavery laws, including the *Modern Slavery Act 2018* (Cth) and the *Criminal Code Act 1995* (Cth) (Divisions 270 and 271).
 - Comply with other relevant laws (for example, laws relating to minimum working age, employment conditions and wages).
 - Ensure workers have the right to freely choose employment and enjoy freedom of movement and association.
 - Provide safe and clean working conditions.
 - Provide a work environment free from discrimination, harassment and abuse.
 - Conduct due diligence across business operations and supply chains.
 - Implement training for relevant employees to ensure we understand, identify and address modern slavery risks.
 - Commit to provide remediation.
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Responsibility for the policy

The Chief Operating Officer has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that our business complies with it.

The Directors are responsible for approving our annual modern slavery statement and ensuring that it complies with the *Modern Slavery Act 2018* (Cth).

The Supply Chain Manager and Sourcing (**Compliance Manager**) has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it. The Compliance Manager's responsibilities extend to:

- (a) monitoring and auditing internal controls and procedures, and consulting with relevant stakeholders to identify risks of modern slavery practices in our operations;
- (b) monitoring, auditing and consulting with our contractors and suppliers to identify risks of modern slavery practices in our supply chains;
- (c) developing measures to assess and address any risks of modern slavery, including through due diligence and contractual obligations;
- (d) monitoring the effectiveness of those measures;
- (e) developing appropriate training materials and programs for our employees to comply with this policy; and
- (f) developing remediation programs.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given training as appropriate. This will include training on how to identify modern slavery practices and the parts of our business and supply chains which are subject to a greater risk of modern slavery practices

Employees and our contractors are also responsible for aiding their own understanding of this policy, participating in training as appropriate, following this policy in their day-to-day activities and reporting any risks of modern slavery they identify in our business or supply chains.

Suppliers are responsible for ensuring their employees and suppliers involved in the supply of goods or services to us understand and comply with this policy.

Compliance with the policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or on our behalf (for example, our suppliers). You are required to avoid any activity that might lead to a potential or actual breach of this policy or relevant laws making modern slavery an offence (including but not limited to, Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth)).

If you believe or suspect that a breach of this policy has occurred or may occur in the future, you must report it in accordance with our Whistleblowing Policy as soon as possible.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within our business or any tier of our supply chains constitutes any of the various forms of modern slavery, raise it through the process set out in our Whistleblowing Policy.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should raise it using the process set out in our Whistleblowing Policy.

Communication and awareness of this policy

This policy is available to all our employees on our intranet.

Our commitment to addressing the issue of modern slavery in our business and supply chains will be communicated as appropriate to our contractors and supply chain participants at the outset of our business relationship with them and reinforced as appropriate thereafter (including by way of appropriate obligations in the supply contract).

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Schedule 1

Whistleblowers policy