

5.11 MODERN SLAVERY POLICY

Company policy to address and mitigate modern slavery in the workplace & its supply chain

INTRODUCTION/SCOPE

The company is committed to a workplace and supply chain that is free from modern slavery.

This policy applies to individuals and entities associated with the company, including employees, contractors, suppliers, and other third parties the organisation may engage or have dealings with.

MODERN SLAVERY

Modern slavery is a term used to describe serious exploitative situations, including human trafficking, forced labour and debt bondage. Coercion, threats or deception are used to exploit victims and undermine their freedom for personal or commercial gain.

The Modern Slavery Act 2018 (Cth) defines eight types of serious exploitation:

- **Human trafficking** – when a person is recruited, harboured or transferred for exploitation through force, fraud or deception with the aim of exploiting them for profit.
- **Slavery** – when a person treats someone like property that can be used, bought, sold or traded.
- **Forced labour** – when a person uses coercion to make someone feel they cannot stop working or leave their place of work.
- **Forced marriage** – when a person is made to get married without their consent.
- **Servitude** – when a person uses coercion to make someone feel they cannot stop working or leave their place of work. Their freedom is restricted – they may be told who they can see and talk to.
- **Debt bondage** – when someone is forced to work to repay an excessive debt that they might never be able to pay off. The debt may be real or not.
- **Deceptive recruiting for labour services** – when a person uses tricks or lies to recruit someone for a job involving exploitation.
- **Worst forms of child labour** – when children are in slavery or slavery-like practices such as forced labour, hazardous work, sexually exploited or forced to carry out illegal activities.

Whilst modern slavery does not include practices like substandard working conditions or underpayments of wages, they may be present in some modern slavery situations.

OUR COMMITMENT

The company is committed to addressing and mitigating modern slavery risks across its entities and supply chain by:

- Reporting on modern slavery in accordance with the Modern Slavery Act 2018 (Cth)
- Implementing processes and procedures to identify, assess and eliminate modern slavery risks across its entities and supply chain
- Promoting employee awareness of modern slavery
- Implementing a continuous improvement approach

RESPONSIBILITIES

The board of directors oversees the company's modern slavery obligations, ensuring appropriate governance and oversight of modern slavery risk management, and approves the organisation's annual modern slavery statement.

Employees and contractors are responsible for understanding and complying with this policy, participating in any necessary training, reporting any concerns relating to modern slavery or breaches of this policy, and fully cooperating with any subsequent investigations.

In addition, managers and supervisors are responsible for conducting due diligence on suppliers before making any purchasing or procurement decisions.

REPORTING MODERN SLAVERY CONCERNS/BREACHES

The employer relies on its employees and disclosers to maintain its culture of honest and ethical behaviour. To this end, it is expected that any discloser who becomes aware of an actual or suspected modern slavery breach will make a formal report. A report can be made directly to the employee's manager or any senior manager/human resources.

External parties may make a report to the company's senior management via our head office.

This policy should be read in conjunction with the company's **5.10 Whistleblower Policy**.

INVESTIGATING MODERN SLAVERY CONCERNS/BREACHES & CONSEQUENCES

Any modern slavery concerns identified within our supply chain will be investigated promptly and addressed as appropriate.

Suppliers are required to comply with the law and this policy. The company reserves the right to cease a relationship with a supplier, should they fail to remediate a modern slavery concern, the concern be unresolvable, or in the event the supplier's actions are unlawful or in breach of this policy.