



1. Purpose

This policy outlines our commitment to preventing modern slavery, forced labour, human trafficking, and exploitative employment practices within our operations and supply chain. Although we are not legally required to publish a Modern Slavery Statement, we voluntarily adopt ethical employment standards consistent with Australian expectations for responsible business conduct.

2. Scope

This policy applies to:

- All employees (full-time, part-time, casual, fixed-term)
- Contractors, labour-hire workers, and consultants
- Suppliers, subcontractors, and service providers
- Any third parties acting on behalf of the organisation

3. Legislative Framework

This policy is guided by:

- **Modern Slavery Act 2018 (Cth)**
- **Fair Work Act 2009 (Cth)**
- **National Employment Standards (NES)**
- Relevant **Modern Awards**
- **Work Health and Safety (WHS)** legislation
- International Labour Organization (ILO) conventions relating to forced labour and child labour

4. Our Commitment

We commit to:

- Ensuring all work is freely chosen and free from coercion
- Providing lawful wages, entitlements, and safe working conditions
- Preventing child labour, forced labour, and deceptive recruitment practices
- Promoting dignity, equality, and respect for all workers
- Engaging suppliers who uphold ethical employment practices
- Taking reasonable steps to identify, assess, and address modern slavery risks

5. Definitions

Modern slavery includes forced labour, servitude, debt bondage, deceptive recruitment, human trafficking, forced marriage, and child labour.

Ethical employment means fair, transparent, and lawful treatment of workers, including safe conditions, fair pay, and freedom of association.

6. Ethical Employment Standards

We uphold the following standards across our workforce:

6.1 Employment is freely chosen

- No worker is required to lodge deposits or surrender identity documents.
- Workers may leave employment with appropriate notice as per the Fair Work Act.



6.2 Fair wages and conditions

- All employees receive wages and entitlements that meet or exceed the NES, Modern Awards, or enterprise agreements.
- Overtime, penalty rates, and allowances are paid correctly.
- Labour-hire workers must receive conditions no less favourable than direct employees performing similar work.

6.3 Safe and respectful workplaces

- We provide a safe working environment in line with WHS laws.
- Bullying, harassment, and discrimination are not tolerated.

6.4 No child labour

- We do not employ workers under the legal minimum working age.
- We do not engage suppliers who use child labour.

6.5 Freedom of association

- Workers may join or not join a union.
- Workers may raise concerns without fear of retaliation.

7. Supplier and Contractor Expectations

We expect suppliers to:

- Comply with all Australian labour, employment, and WHS laws
- Avoid practices that may contribute to modern slavery
- Ensure their own subcontractors and supply chains uphold ethical standards
- Provide information when requested as part of due diligence
- Notify us immediately of any suspected or confirmed modern slavery incidents

We may suspend or terminate relationships with suppliers who fail to meet these expectations.

8. Risk Identification & Due Diligence

We undertake proportionate due diligence, which may include:

- Assess suppliers based on industry, geography, and labour practices
- Prioritising review of suppliers in higher-risk categories (e.g., cleaning, uniforms, labour-hire, offshore manufacturing)
- Including modern slavery and ethical employment clauses in contracts
- Periodic review of labour-hire providers to ensure compliance with Fair Work laws

9. Reporting Concerns

Anyone may report concerns about unethical or exploitative practices.

Reports can be made confidentially to:

- A manager
- Human Resources
- An external whistleblowing channel (if applicable)

All reports will be investigated promptly and sensitively. Retaliation against individuals who raise concerns is prohibited.



10. Training & Awareness

We provide training appropriate to our size and risk profile, including:

- Awareness of modern slavery indicators
- Ethical employment obligations under Australian law
- How to report concerns

Training is provided to HR, procurement, and managers, with refresher training as needed.

11. Continuous Improvement

We commit to:

- Reviewing this policy annually
- Updating our practices as legislation or risks evolve
- Strengthening supplier engagement and transparency
- Improving internal awareness of ethical employment obligations

12. Responsibilities

- **Senior Leadership:** Oversight and approval of this policy.
- **Managers:** Implement ethical employment practices and monitor supplier compliance.
- **HR:** Ensure lawful employment conditions and manage training.
- **Employees:** Follow this policy and report concerns.
- **Suppliers:** Meet the standards outlined in this policy.

13. Approval & Review

This policy is approved by senior management and will be reviewed annually or when significant changes occur in legislation or organisational structure.

Mitchell Flor (CEO)

30/11/2025
Date