

Modern Slavery Policy

1. Introduction

Modern slavery is a term which covers a range of exploitative practices including human trafficking, slavery and slavery-like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children and debt bondage.¹

Business plays an important role in respecting and promoting human rights and eradicating modern slavery.²

2. Scope

This Policy applies to all persons working for or on behalf of, or providing services to, Mader Group Ltd or its related entities (**Company**), including all directors, employees, executive management, suppliers, contractors, consultants and representatives (**Representatives**).

The Company expects all Representatives and potential Representatives to familiarise themselves with this Policy. This Policy sets out the minimum standards to which all Representatives of the Company must adhere to at all times.

3. Objective

The *Modern Slavery Act 2018* (Cth) (**Act**) took effect on 1 January 2019 and requires the Company to make annual public reports on our actions to address modern slavery risks in our operations and supply chains.

The purpose of this Policy is to ensure that the Company:

- (a) is compliant with local, national and other applicable laws and regulations regarding modern slavery, including the Act, in the areas in which we operate;
- (b) sources products and services in accordance with our legal obligations and community expectations regarding modern slavery; and
- (c) takes actions to prevent, mitigate and where appropriate remedy, modern slavery in our operations and supply chains.

4. Modern slavery policy

Each Company business unit must adopt policies and procedures to ensure it is addressing modern slavery and ethical sourcing risks in its operations and

¹ Refer to the *Modern Slavery Act 2018* (Cth) (available from: www.legislation.gov.au/Details/C2018A00153) and the Department of Home Affairs: *Commonwealth Modern Slavery Act 2018: Guidance for reporting entities (2018)* (available from: www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reportingentities.pdf) for further details on conduct constituting modern slavery.

² Source: Walk Free Foundation.

supply chains in a way that is appropriate for the relevant business unit, including but not limited to:

- (a) ensuring employment is freely chosen;
- (b) ensuring no type of forced or bonded labour are used;
- (c) preventing excessive powers of ownership over employees and staff;
- (d) preventing coercion, threats or deception to engage or continue to engage employees and staff;
- (e) preventing harassment or abuse;
- (f) ensuring freedom of association and appropriate grievance mechanisms and recourse are available;
- (g) ensuring safe and hygienic working environments are available;
- (h) preventing bribery, favours or benefits or other similar unlawful or improper payments are made;
- (i) ensuring compliance with minimum legal age working requirements;
- (j) ensuring compliance with applicable laws and regulations regarding local wages, compensation and legally mandated benefits;
- (k) ensuring compliance with applicable laws and regulations regarding working hours; and
- (l) ensuring compliance with the Company's other policies including the Anti-Bribery and Anti-Corruption Policy, Code Of Conduct and Diversity Policy.

Each Company business unit must conduct risk assessments to determine which parts of its business and operations (including supply chains) are most at risk from modern slavery so efforts can be focused on those most at risk areas.

Where appropriate, as informed by risk assessments, each Company business unit must engage with suppliers to gain a proper understanding of the measures they have in place to prevent modern slavery within their own business.

Where appropriate, Company business units must assess their suppliers through an audit/compliance program to confirm compliance with this Policy, involving relevant personnel or external providers when required.

Adequate awareness and training will be provided for employees and staff with relevant roles in relation to this Policy.

Without limiting the above, each Company business unit must, as far as practicable:

- (a) include in its operational and supplier contract terms requirements that suppliers comply with all local, national and other applicable laws and regulations regarding modern slavery in the areas in which they operate;
- (b) ensure that contractual terms with Representatives require compliance with this Policy and reserve the right to terminate any contractual arrangement if there is a breach of this Policy;

- (c) encourage and promote best practices and continuous improvement regarding modern slavery within its business unit and across all applicable Representatives; and
- (d) monitor and review the effectiveness of this Policy, taking into account its suitability, adequacy and effectiveness as per risk assessments.

5. Roles and Responsibilities

It is the responsibility of all Representatives to know and adhere to this Policy.

The Board has direct responsibility for the Policy, for maintaining it and for providing advice and guidance on its implementation. All Company business unit managers are directly responsible for implementing the Policy within their business areas, and for ensuring adherence by their staff and other applicable Representatives.

6. Compliance

All Representatives are required to familiarise and fully comply with this Policy. Any breach of this Policy will be taken seriously and dealt with on a case by case basis. Any Representative who fails to comply with this Policy may be subject to appropriate disciplinary and other actions.

7. Reporting

Representatives who become aware of any actual or suspected breach of this Policy should report this to either the Company Secretary or take action pursuant to the Company's Whistleblower Protection Policy. Any whistleblowing reports should be made in accordance with the Company's Whistleblower Protection Policy.

Processes are in place to ensure reports are investigated and appropriate action taken. The Company will not permit retaliation of any kind against any Representative for making good faith reports about actual or suspected violations of this Policy.

8. Review and Amendment

This Policy will be reviewed annually and may be amended from time to time at the sole discretion of the Company.

9. Enquires

Enquiries about this Policy should be directed to the Company Secretary at +61 9353 3393.