

# MODERN SLAVERY POLICY

## Intent & Purpose

Springmount Services is committed to ensuring we minimise the risk of modern slavery and the potential exposure to human rights risk more broadly, by acting responsibly and within the dictates of The Modern Slavery Act of 2018 through strengthening our risk assessment program and aligning all applicable Policies towards the aims of The Act.

## Operation and Incidence

### Application

While we recognise that modern slavery and human trafficking risk may occur in our extended supply chain, we know that the level of risk is influenced by complex factors. Accordingly, we have tailored our risk system to focus our efforts on those areas that present an elevated risk of exposure; through Lines of Action covering internal processes and procedures, and external programs and initiatives.

Accordingly the applicability of this Policy is not confined solely to our employees. Therefore we are committed to ensuring that we make a difference beyond our business operations as global and community citizens.

### Scope

In its broadest, the term 'modern slavery' refers to any situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception. The Australian regime defines modern slavery to incorporate conduct that would constitute an offence under existing human trafficking, slavery and slavery-like offence provisions set out in Divisions 270 and 271 of the Commonwealth Criminal Code. Modern slavery, therefore, encompasses slavery, servitude, the worst forms of child labour, forced labour, human trafficking, debt bondage, slavery-like practices, forced marriage and deceptive recruiting for work or services.

### Lines of Action

We will assess and mitigate Modern Slavery risk by;

- a due diligence process, before onboarding or contract award. Initially, suppliers are requested to answer a brief prequalification questionnaire administered in the Group procurement contract management.
- Working with suppliers to strengthen their internal policies and procedures including, but not limited to, workers' labour and payroll conditions.
- And using our leverage to work with the supplier to implement solutions that meet international human rights standards. Our enterprise-wide risk framework defines the escalation threshold for reporting of risks to the relevant governance committee.
- Having established allied processes allowing internal grievance resolution guidelines which outline procedures and resolution options for our employees.
- Embracing new Australian legislation designed to protect vulnerable workers under the Fair

Work Act, the Modern Slavery Act and Whistleblower Protection Act.

**Monitoring and Reporting Mechanisms**

We will have systems in place to monitor the risk of Modern Slavery. This includes risk control processes to act upon monitoring outcomes and to seek continuous improvement. The risks identified shall be analysed and evaluated by reviewing the procedures, practices and processes that govern our operations, and treated using the principle of descending control options.

**Resource Management**

We will review suppliers and 3<sup>rd</sup> Party providers to ensure they comply with the requirements of this policy.

**Subordinate documents**

SMS 1031 DOC Prequalification Questionnaire

**RACI**

Responsible	It is the responsibility of the Executive Committee to implement, maintain and communicate this policy.
Accountable	The final authority for this policy lies with the Managing Director.
Consulted	When making changes to this policy, a consultation should be carried out with the leadership team.
Informed	All changes to this policy should be communicated to all leaders.

**Breach of The Policy**

Breach of this policy may be regarded as misconduct, leading to disciplinary action which may result in termination of employment or engagement. An individual may also be exposed to criminal or civil liability for a breach of relevant legislation.