

MODERN SLAVERY POLICY

PURPOSE OF THE ASKIN GROUP MODERN SLAVERY POLICY

The Askin Group (the **Business** being Askin Group Holdings and its controlled entities) recognises the importance of promoting transparency and stronger business practices to eradicate modern slavery and related abuses within all businesses and, equally important, within its global supply chain.

The Business understands that modern slavery is a growing and complex issue, best tackled by collective commitment and responsibility. The objective of the Business' modern slavery policy (**Policy**) is to set clear expectations to its employees and to its suppliers to be alert to the possible and inadvertent risk of commercial involvement in modern slavery. This will require all stakeholders to work collaboratively to prevent and address this risk.

The *Commonwealth Modern Slavery Act 2018* (MS Act) was enacted in November 2018 and requires the Business to make public annual reports (Modern Slavery Statements) on the actions the Business has undertaken.

The Policy is a key document that confirms the Business' commitment to upholding the objectives of the MS Act. This Policy outlines the framework to ensure that the Business:

- is compliant with the objective of the MS Act and other applicable laws in the areas in which its businesses operate;
- procures its products in accordance with legal obligations and community expectations;
- acts to prevent, mitigate and, where appropriate, remedy modern slavery in its business operations and supply chains by taking steps to further support our suppliers' businesses to uphold the highest standards whether or not they are obliged to comply with the objectives of the MS Act.

If the Policy is breached, the Business will act as quickly as possible to address any adverse impacts on relevant stakeholders.

The principles of this Policy must be complied with directly or incorporated into policies within the relevant business divisions (e.g. Construction, Operations).

WHAT IS MODERN SLAVERY?

"*Modern slavery*" means slavery as traditionally understood, where one person owns or controls another person, or engages in slave trading.

The definition of "*modern slavery*" also extends to other forms of abuse such as:

- Forced labour, where a person has no choice about having to work, and cannot refuse to work or negotiate working conditions;
- Debt bondage, where a person works for an undefined or poorly defined period of time to pay off a debt, especially a debt that is excessive;
- Servitude, where a person works because of the use of coercion, threat or deception;
- Deceptive recruiting for labour or services, where a person is misled about the nature of work on offer;
- People trafficking; and
- Child labour.

Forced marriage, and child marriage, is also recognised as a form of modern slavery.

Each of these offences involve exploitation of a worker with a significant or absolute loss of freedom.

Even if a worker could escape from their predicament, the fact that a worker does not escape, or attempt to escape their situation, does not in any way provide a defence to the person engaging in the exploitation of the worker.

While the MS Act does not impose financial penalties or other sanctions for any non-compliance, Australian criminal law does impose severe penalties under the Commonwealth Criminal Code.

OUR POLICY

The Business will:

- a) Adopt policies and implement procedures to ensure that it is addressing ethical sourcing and modern slavery risks in its operations and supply chains in a way that is appropriate for the relevant division.

- b) As far as is practicable, include in its operational and supplier contract terms, requirements that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate.
- c) As far as is practicable, use in its operational and supplier contract terms requirements that suppliers:
 - i. comply with Minimum Standards in their businesses detailed further below;
 - ii. include rights of termination if the supplier is unable or unwilling to work towards compliance with Minimum Standards.
- d) As far as practicable:
 - i. encourage its suppliers to exceed the Minimum Standards, and promote best practice and continuous improvement; and
 - ii. Monitor its suppliers for compliance with the Minimum Standards through supplier assessment processes taking into account all relevant risk factors such as country risk and product risk.

Minimum Standards

The minimum standards we expect to be upheld include:

- No forced or bonded labour. Employees must not be under threat of any penalty, restriction on movement or inability to leave their employment.
- Employees must be of minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (ILO) Convention 138. Suppliers must be able to verify the age of all employees to ensure compliance. Where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.
- Compliance with all laws concerning wages, overtime and other legally mandated benefits. Wage records must be up to date, accurate and transparent. Employment conditions must be comprehensible to workers. Deductions to wages must not be made other than as permitted by law.
- Working hours must comply with all local laws or in the absence of such laws by the applicable ILO convention. Overtime shall not be excessive and must be compensated in accordance with applicable local laws.
- No discrimination on the basis of personal characteristics. A person's ability to do their job should be the paramount consideration in employment. Workplaces should be free of harassment, discrimination and other inappropriate workplace behaviour.

- Workplaces should be safe, hygienic which minimises the risks to health and otherwise complies with all relevant laws.
- Bribes, favours and other improper payments must not be made.
- Compliance with all local environmental protection laws, and as far as practicable, compliance with accepted international environmental protection standards.

Risk Management Strategies

The risk management strategies the Business will implement include:

- Nomination of at least one specific individual or role responsible for co-ordinating risk management.
- Supply chain mapping and risk assessment through engagement with our supply chain.
- Due diligence on new suppliers through suitable new supplier engagement.
- Programs for audit and compliance which may involve internal and external resources.
- Training for persons engaged in the sourcing of labour and materials.
- Reporting mechanisms which provide protection in the event of identification or disclosure of modern slavery or unethical practices.
- Strategies for stakeholder engagement.
- Annual review of the effectiveness of existing practices.
- Strategies to engage with suppliers to and other stakeholders to remediate any breaches.

QUESTIONS ABOUT THIS POLICY

If you have any questions, comments or suggestions about the content or application of this policy, including any improvements, please contact Askin's Modern Slavery Coordinator; at: modernslavery@askin.net.au.

Steve Clarke

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