
Policy

Modern Slavery

Note: This policy is adopted in full, from our parent company Tasma Limited. Please refer to <https://tasma.com.au/sitemap/corporate-governance/> for the current wording and content.

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1. Purpose

- (a) Tasmea Limited and all of its subsidiaries (Company) are committed to managing the issue of modern slavery and working with its stakeholders to bring it to an end.
- (b) This policy has been adopted to ensure that the Company adequately assesses and addresses modern slavery risks in its business and its supply chains.
- (c) The aims of this policy are to:
 - (i) ensure compliance with all applicable modern slavery laws and take steps to meet community expectations around modern slavery;
- (d) provide clear guidance for the reporting and investigation of any suspected modern slavery within the Company's business; and
- (e) develop supply chains across the Company that have adequate procedures to prevent and address modern slavery.
- (f) In conjunction with this policy, the Company will comply with its obligations under the Modern Slavery Act to give an annual statement describing the risks of modern slavery in the operations and supply chains of the Company and information about actions taken to address those risks.

2. Compliance

This policy applies to all entities, employees and representatives of, and within, the Company. It is also expected that any supplier or subcontractor to the Company apply similar standards when working with us.

3. Addressing Modern Slavery

- (a) The Company has a zero tolerance approach to any form of modern slavery within its own operations.
- (b) The Company is also committed to working with subcontractors and suppliers to ensure their practices are aligned with the Company's expectations concerning modern slavery. The Company has a clear expectation that all of its subcontractors and suppliers operate in accordance with modern slavery laws and are socially responsible.
- (c) Each entity in the Company must:
 - (i) adopt procedures to ensure that it is addressing modern slavery and ethical sourcing risks in its operations and supply chains in a way that is appropriate for its business;
 - (ii) make enquiries with its subcontractors and suppliers to identify any modern slavery risks;
 - (iii) insofar as far as practicable, include in its operational and supplier contract terms:
 - (d) (A) a requirement that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate;
 - (e) (B) a requirement that the supplier comply with the Minimum Standards;
 - (f) (C) a right of termination if the supplier is unable or unwilling to work towards full compliance with the Minimum Standards.

4. Reporting of Suspected Modern Slavery

- (a) If any person becomes aware or suspects that modern slavery is taking place within the Company, they are strongly encouraged to notify management. This applies whether or not the suspected incident of modern slavery involves the Company or one of its third party suppliers. Management must then report any issues to the Executive Chairman of the Company or the Company Legal Counsel on the details listed below at paragraph 4(b).
- (b) If a person does not feel comfortable notifying management, they may call or send a confidential email directly to either of the following:

- **Executive Chairman**
Stephen Young, (08) 8212 2929, syoung@equityadvisory.com.au
(and marked "CONFIDENTIAL – SUSPECTED MODERN SLAVERY BREACH" in the subject line).
 - **Group Counsel**
Marnie Robinson, 0477 016 550, mrobinson@tasmea.com.au
(and marked "CONFIDENTIAL – SUSPECTED MODERN SLAVERY BREACH" in the subject line).
- (c) All matters reported under this policy will be investigated as soon as practicable after the matter has been reported. Where appropriate, the Company Legal Counsel will respond to any issues raised, including to any known or suspected instances of modern slavery that are identified.

5. Failure to Comply

Any failure to comply with this policy will be regarded as serious misconduct and may lead to disciplinary action, including termination of employment or engagement.

6. Review

This policy will be reviewed from time to time to ensure that it remains effective and meets best practice standards and the needs of the Company.

7. Definitions

ILO means the International Labour Organisation;

Minimum Standards means the following standards:

- (a) No forced or bonded labour: Employment must be freely chosen.
- (b) No child labour: Suppliers shall comply with the minimum legal working age in the country in question or in the absence of such law, by the applicable ILO convention.
- (c) Wages, benefits and transparent record keeping: Suppliers must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits. Record keeping must be accurate and transparent.
- (d) Working Hours: Working hours must comply with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable ILO convention.
- (e) No discrimination: All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation.

modern slavery has the meaning given to it in the Modern Slavery Act, and generally includes exploitative practices such as slavery, servitude, human trafficking, forced labour, child labour, debt bondage and slavery-like practices;

Modern Slavery Act means the Modern Slavery Act 2018 (Cth).