

## ***Modern Slavery Policy***

### ***Introduction***

This Modern Slavery Policy is in accordance with the requirements outlined in paragraphs 103 and 104 of the relevant legislation or guidance, commonly referred to as RATO (Regulation against Trafficking and Exploitation). It sets out our organization's commitment to combating modern slavery, including forced labour and human trafficking, within our operations and supply chains.

### ***Policy Statement***

#### **Definition of Modern Slavery:**

In line with RATO's definitions, we define modern slavery as any form of forced labor, human trafficking, or exploitation that deprives individuals of their freedom, dignity, and human rights for the purpose of exploitation or economic gain.

#### **Prohibition of Modern Slavery:**

We are firmly committed to preventing, detecting, and eradicating modern slavery practices in all our operations and supply chains. We have zero tolerance for any form of modern slavery and will take decisive action against any violation of this policy.

#### **Compliance with RATO:**

We adhere to the specific requirements and obligations set forth in paragraphs 103 and 104 of RATO. We ensure that our policies, procedures, and practices are aligned with the provisions outlined in this legislation.

### ***Responsibilities and Accountability***

#### **Leadership Commitment:**

Our leadership team is responsible for ensuring the effective implementation of this Modern Slavery Policy. They are committed to fostering a culture of ethical business conduct, compliance, and the elimination of modern slavery within our organization and supply chains.

**Employee Awareness and Training:**

We provide regular training and awareness programs to our employees to ensure they understand the risks and indicators of modern slavery, as well as their responsibilities in reporting any concerns or suspicions.

**Supply Chain Due Diligence:**

We conduct robust due diligence on our supply chains to identify and mitigate the risk of modern slavery. This includes assessing suppliers, contractors, and business partners based on their compliance with RATO's requirements and commitment to ethical practices.

***Risk Assessment and Mitigation*****Risk Identification:**

We conduct thorough risk assessments to identify areas of vulnerability to modern slavery within our organization and supply chains. This may involve analyzing geographical locations, industry sectors, specific activities, and the potential impact of our operations on modern slavery risks.

**Risk Mitigation Strategies:**

Based on the risk assessment findings, we implement appropriate risk mitigation strategies. These may include implementing supplier screening processes, conducting audits, and establishing contractual provisions that prohibit modern slavery practices.

***Reporting and Whistleblowing*****Reporting Mechanism:**

We provide a confidential and accessible reporting mechanism, such as a dedicated hotline or secure communication channels, for employees, suppliers, and stakeholders to report any concerns or suspicions related to modern slavery.

**Non-Retaliation:**

We strictly prohibit retaliation against individuals who report concerns or suspected cases of modern slavery in good faith. Reports will be treated confidentially, and appropriate investigations will be conducted.

## ***Monitoring and Review***

### **Monitoring and Evaluation:**

We regularly monitor, evaluate, and report on the effectiveness of our modern slavery prevention efforts. This includes assessing supplier compliance, conducting audits, and tracking the implementation of risk mitigation measures.

### **Policy Review:**

We review and update this Modern Slavery Policy in accordance with changes in legislation, regulations, and best practices. We consider feedback from stakeholders, emerging trends in modern slavery prevention, and any updates to RATO's requirements during policy revisions.

## ***Communication and Awareness***

### **Policy Communication:**

We communicate this Modern Slavery Policy to employees, suppliers, contractors, and other relevant stakeholders. It is readily accessible on our website, intranet, or through other communication channels.

### **Stakeholder Engagement:**

We engage with our stakeholders, including suppliers, customers, and community organizations, to raise awareness, foster collaboration, and drive collective action in combatting modern slavery.