

Policy Name: Modern Slavery Policy

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1 Definitions

- **Modern Slavery Act 2018 (Cth)** being the Commonwealth legislation (the Act) enacted by the Parliament of Australia on 29 November 2018 (and may be amended from time to time).
- **Modern slavery** for the purposes of this policy is defined as including eight types of serious exploitation and outlined in Section 5.
- **Operations** is defined as activity undertaken by Insitec Group Holdings Pty Ltd and its subsidiaries.
- **Partner (partnership)** means all relationships between Insitec and a Partner whereby Insitec grants the Partner the possibility of using its name, emblem/logo or image in its communication and promotional materials, thereby potentially creating a public association of image between the Partner and Insitec. This relationship includes arrangements of; sponsorships, cause-related marketing initiatives, and strategic alliances.
- **Risks of modern slavery practices** means the potential for Insitec to cause, contribute to, or be directly linked to modern slavery through its supply chains and operations.
- **Insitec** is the term used to refer to Insitec Group Holdings Pty Ltd and all subsidiaries.
- **Insitec staff and contractors** includes any current:
 - Members of a Governance Body (members of the Insitec Group Holdings Board, its subcommittees or any subsidiary Boards/subcommittees)
 - Employees;
 - Members; and
 - Contractors.
- **Suppliers** is defined as any organisation or person who provides us with goods or services, including their subcontractors, agents, related entities and consultants.
- **Supply chains** is defined as the products and services (including labour) that contribute to Insitec's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

2 Policy Statement

This policy affirms Insitec's commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations (procurement, code of conduct, human resources policies).

It is consistent with our Governance Framework, that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations. As a result, this Modern Slavery Policy forms part of Insitec's Governance Framework.

This Policy also supports the intent of international conventions, treaties and protocols relevant to combatting modern slavery and the *Modern Slavery Act (Cth) 2018*.

3 Aim and Objectives

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. There are an estimated 40.3 million victims of modern slavery globally. Women and girls are over-represented, comprising 71 per cent of victims and nearly two-thirds of modern slavery victims are located in the Asia-Pacific region.

Insitec is committed to doing its part in contributing to ending all forms of modern slavery, both in Australia and overseas, by ensuring our own supply chains and operations don't contribute to modern slavery practices, and to take appropriate action to respond to the humanitarian impacts of modern slavery.

4 Scope of the Policy

This Policy applies to all Insitec employees and contractors.

5 Policy

Insitec maintains a Modern Slavery Policy (this Policy) outlining our approach to reducing the risk of modern slavery practices within our supply chains and operations. The Policy provides guidance on the steps Insitec takes to work with suppliers to reduce risks and the range of supports available for when an Insitec employee or contractor becomes aware that someone is at risk of or affected by modern slavery practices.

5.1 What is modern slavery

Modern slavery is defined by the *Modern Slavery Act (Cth) 2018* to include eight types of serious exploitation and which can be understood as:

- **trafficking in persons**, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
- **slavery**, which is where the offender exercises powers of ownership over the victim;
- **servitude** which is where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work;
- **forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work;
- **forced marriage**, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
- **debt bondage**, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
- **the worst forms of child labour**, which involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
- **deceptive recruiting for labour or services** which is where the victim is deceived about whether they will be exploited through a type of modern slavery.

It can also extend to:

- entering into a commercial transaction involving a slave;
- exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading;
- conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it);

5.2 Insitec's approach to limiting the risk of modern slavery practices

Insitec will work proactively to reduce modern slavery within our supply chains and operations and we expect all organisations we engage with to do the same.

5.2.1 Supply Chain

➤ **Insitec Supplier Code of Conduct:**

We expect all existing and new Suppliers to comply with the principles set out in our Supplier Code of Conduct. Fundamental to the Supplier Code of Conduct is an expectation that all Suppliers operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed. Suppliers must use their best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event Suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify Insitec as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

➤ **Insitec's contractual terms**

Our contractual terms reflect Supplier obligations outlined in the Supplier Code of Conduct, including compliance with Australian modern slavery laws and those foreign modern slavery laws that apply in the location(s) in which they operate.

➤ **Supply chain mapping and risk assessment**

We encourage our suppliers to complete a due diligence questionnaire which contains questions on corporate social responsibility, including various questions relevant to modern slavery. Answers to this questionnaire provide us with a greater understanding of the risk of modern slavery within a supplier's supply chains and/or operations and enable us to work with a supplier to reduce any risks identified. We will actively and progressively improve our understanding and oversight of all tiers of our supply chains. Where a risk is unacceptable to Insitec, that supplier cannot and will not be used.

5.2.2 Operations

➤ **Incorporating modern slavery into other policies**

When existing policies undergo policy review or new policies are under development, policy owners are required to identify existing modern slavery commitments that can be enhanced, or where modern slavery protections can be incorporated.

➤ **Ethical Investments**

No investment should knowingly be made in companies who engage in activities or services which could be reasonably understood to contribute to or exacerbate modern slavery practices.

➤ **Human Resources**

Insitec is committed to ensuring the health, safety and wellbeing of our workforce and we maintain a suite of policies that are informed by and compliant with Australian workplace and occupational health and safety law. Where volunteer work occurs, we ensure that our volunteers are engaged on a truly voluntary and non-exploitative basis.

5.2.3 **Communications, Engagement and Training**

Insitec employees will be provided communications and training opportunities to enhance their understanding of the causes and humanitarian impact of modern slavery, the Modern Slavery Policy and our approach to limiting the risk of modern slavery within our supply chains and operations.

Insitec employees with high purchasing responsibilities are to be provided additional training on the Insitec Supplier Code of Conduct, Corporate Social Responsibility tool, Insitec contractual terms, and supporting suppliers to undertake due diligence.

Insitec employees who initiate and/or periodically review relationships with third parties are provided with training to apply the central and whole of organisation due diligence tool and processes.

5.2.4 **Continuous improvement approach to reducing the risk of modern slavery**

We are committed to applying a continuous improvement approach to how we reduce the risk of modern slavery practices within our supply chains and operations.

We will seek feedback from our employees, contractors, suppliers, partners and other parties in regard to the success or otherwise of the actions we have taken to reduce the risk of modern slavery.

By 31 December each year we will publish a *Modern Slavery Statement* that outlines the steps we have taken over the financial year to identify where our supply chains and operations may be contributing to modern slavery practices, and the actions we have taken to minimise these risks.

5.3 **Reporting Concerns of modern slavery**

5.3.1 **Reporting unethical or unlawful conduct**

A key part of supporting ethical standards is enabling Insitec employees and contractors (including Suppliers and Partners) to feel free and safe to speak up when there are reasonable grounds to suspect that Insitec or Insitec employees are not acting ethically or in accordance with laws and obligations.

Concerns about compliance or ethical issues or unethical activities are to be reported to the General Manager, Corporate Services in the first instance. If for whatever reason, making a disclosure to the General Manager, Corporate Services is not possible, a report can be made to the Corporate Governance Team via cosec@insitec.com.au.

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Where illegal activity is occurring, it should be reported to the police in the first instance, and if safe/appropriate to do so, the report should be raised with your direct manager as soon as practicable.

5.3.2 Responding to concerns of modern slavery practices

The often-hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. It is important to respond in a way that is safe, ethical and respects the dignity and rights of the person at risk or affected by modern slavery practices.

There are a range of supports available for when an Insitec employee becomes aware that someone is at risk of or affected by modern slavery practices, regardless of if this occurs within Insitec supply chains and operations or in the broader community.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 237 to discuss or report a suspected case. Contact can be made anonymously.

In an emergency and if someone is in immediate danger, please call Triple Zero (000) for police assistance.

6 Responsibilities

- Insitec's Corporate Services team is responsible for maintaining the Modern Slavery Policy and its associated policy documentation.
- Reviews will occur in accordance with the Policy Governance Framework, within a timeframe to be decided upon by the General Manager, Corporate Services.

7 Relevant Documents and Delegations

7.1 Legislation (or External)

- Modern Slavery Act 2018 (Cth). It can be found on Federal Register of Legislation.

7.2 Relevant Internal Reference

- All relevant policies are available from Intranet Policy Library

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8 Appendix A: Update History

Version	Modified By	Approval Date	Approved by	Effective Date	Sections modified
1					