

Pact Group Holdings Ltd
ACN: 145 989 644

Modern Slavery Policy



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1. Purpose

Pact Group Holdings Ltd and its wholly owned subsidiaries (**Pact Group**) recognise that respecting human rights is critical for our ability to contribute meaningful and ongoing social value to our stakeholders and we expect that businesses with whom we work, respect human rights throughout the supply chain. Freedom from slavery is a fundamental human right and Pact Group is committed to addressing, mitigating and preventing slavery in its operations, supply chain and business relationships. Pact Group encourages all individuals and organisations involved with, or employed by, Pact Group to understand the severe consequences that modern slavery poses.

The Pact Group operates with a wide-ranging supply chain, and at times may operate in regions where a form of slavery is more prevalent than in others. We acknowledge that the Pact Group is in a position of influence and can play an important role in preventing modern slavery. The purpose of this Policy is to educate employees of Pact Group about the different forms of modern slavery that can occur in contemporary society to assist Pact Group in taking verifiable steps to reduce modern slavery risks.

2. Who does this Policy apply to?

This Policy applies to all individuals who work for or on behalf of Pact Group, in any capacity, including employees, agency workers, contractors, consultants and any other third-party representative (collectively, **employees**). This Policy does not form part of any contract (including a contract of employment) and it does not create any enforceable contractual rights in employees' favour.

3. Background

In 2018, legislation was introduced by both the NSW and Commonwealth Parliament to:

- support businesses identify and address modern slavery risks;
- increase awareness of modern slavery risks in the business community;
- develop and maintain responsible and transparent supply chains; and
- assist investors and consumers to make informed decisions.

3.1 What is modern slavery?

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom.

The Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**), includes eight types of serious exploitation:

Trafficking in persons. The recruitment, harbouring and movement of a person for exploitation through modern slavery.

Slavery. Where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.

Servitude. 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. The victim is either not free to stop working or not free to leave their place of work.

Forced marriage. 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. 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. Describes situations where children are:

- exploited through slavery or similar practices, including for sexual exploitation;
- engaged in hazardous work which may harm their health, safety or morals; or
- used to produce or traffic drugs.

Deceptive recruiting for labour or services. Describes situations where the victim is deceived about whether they will be exploited through a type of modern slavery.

The Criminal Code Act 1995 (Cth) (**Criminal Code**) also confirms that slavery is unlawful and sets out several slavery and servitude related offences.

3. Background

3.2 What are the risk indicators?

There are several indicators which assist in evaluating whether there is a risk of modern slavery:

Sector and industry risks. Including indicators such as:

- the use of unskilled, temporary or seasonal labour;
- the use of short-term contracts or outsourcing;
- the use of child labour in hazardous conditions; and/or
- recruitment strategies that target specific individuals and groups from marginalised or disadvantaged communities.

Produce and service risks. Including indicators such as:

- cost requirements or timeframes that require suppliers to engage in excessive labour working hours;
- products or goods made in a country where there is a high risk of reported labour exploitation; and/or
- services that are provided in a country where this is a high risk of reported labour exploitation.

Geographic risks. Including indicators such as:

- the country may not have ratified international conventions that relate to modern slavery;
- the country is reported as having a high prevalence of modern slavery; and/or
- there are inadequate protections for workers.

Entity Risks. Including indicators such as:

- the entity has previously been reported as non-compliant with the human rights or labour standards;
- the entity has poorly managed procurement and sourcing processes; and/or
- the entity has complex supply chains and audit results conflict with other sources of information.

3. Background

3.3 What are the indicators of modern slavery?

Modern slavery may not always be easy to identify, but there are a number of indicators, and a combination of these signs may indicate that a person is in a situation of modern slavery, and that further investigation may be required.

The types of indicators include where the suspected victim or victims are:

- living at the workplace, or another place owned/controlled by their employer;
- underpaid or not paid at all;
- required to work excessive hours;
- confined or isolated in the workplace or only leave at odd times;
- guarded at work or in their accommodation;
- isolated in remote locations that are difficult to access and/or restricted from contacting or interacting with people outside the workplace (for example, their phones are confiscated, or they are supervised when in public);
- managed by an intermediary or third party who 'holds' or 'invests' their money for them;
- unable to terminate their employment at any time;
- appear to be servicing a debt to an employer or a third party;
- appear to be subjected to, or threatened with, violence in connection with their employment;
- are not provided with contracts in a language and format that they can easily understand;
- are not informed of or cannot understand the terms and conditions of their employment;
- are not provided with any protective equipment, training or means to refuse to participate in dangerous work practices or to refuse to handle known toxic materials or hazards; and/or
- do not have permission to work because they are from another country or working in breach of visa requirements.

4. Responsibilities of employees

It is important to Pact Group that employees are aware of the risks of modern slavery and this Policy. Employees must not engage in any activity that would constitute modern slavery or could result in modern slavery practices. Any employees who suspects or is aware of modern slavery occurring at Pact Group or an organisation that is a part of the Pact Group's supply chain should report and raise those concerns to their manager.

4.1 Managers and Human Resources are responsible for:

- ensuring their teams are aware of this Policy, especially the indicators of modern slavery;
- escalating to the Executive General Manager Human Resources where they suspect, or an employee tells them they suspect, modern slavery is occurring within Pact Group, or its supply chain;
- maintaining a working knowledge of what is happening in their operations and supply chains;
- accessing expertise on key issues such as child protection, country or sector specific risks and context specific sensitivities;
- identifying actual, or potential, risks of harm as part of their ongoing due diligence processes and develop effective and context appropriate ways to address such risks;
- raising awareness about the risks of harm and potential pathways to remedy within the organisation, their suppliers or other business partners such as recruitment firms and supply chain workforce; and
- clearly communicating Pact Group's expectations regarding modern slavery to suppliers and encouraging honest two-way communication in their engagement

4.2 Employees are responsible for:

- familiarising themselves with this Policy; and
- following the internal reporting process set out in this Policy if they are ever concerned modern slavery may be occurring, or there is a risk that it is occurring, within Pact Group's supply chain.

5. Reporting modern slavery concerns

Concerns relating to modern slavery within Pact Group or its supply chains must be reported directly to managers, Human Resources or Pact's Group Manager Corporate Governance. Employees must not attempt to resolve the situation without support from other areas, such as governments or trusted partners, as this may lead to further harm to the victim or victims.

6. Further Information

For further information and advice about this Policy contact Human Resources or Pact's Group Manager Corporate Governance.

If you are not sure whether this Policy impacts on an intended course of action or behaviour, you should refrain from engaging in the conduct and seek advice from your Human Resources Manager. If in doubt, don't do it.

7. Related documents

You should also review the Pact Group's other relevant policies. Copies of these policies are available on the Pact Group's internet and intranet. Each employee must be familiar with and comply with each of these policies.

Version Control Page

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