

Pact Group Holdings Ltd
ACN: 145 989 644

Modern Slavery Policy



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1. Purpose of this policy

Slavery is a crime and a violation of fundamental human rights. In a modern context, slavery takes various forms such as servitude, forced labour, forced marriage, debt bondage, human trafficking and the worst forms of child labour (**modern slavery**). Modern slavery ultimately results in the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Pact Group Holdings Ltd (the **Company**) and its subsidiaries, wherever located (**Pact Group, we, us or our**), have a zero-tolerance approach to modern slavery. The purpose of this modern slavery policy (**Policy**) is to outline our commitment to acting ethically in our business dealings by addressing, mitigating and preventing modern slavery in our operations, supply chains and business dealings.

In particular, this Policy sets out our commitment to:

- responsibly source goods or services to use in our business;
- ensure there is transparency in our approach to tackling modern slavery in our own business and throughout our supply chains;
- take action to prevent, mitigate and where appropriate, remediate the harm caused by modern slavery occurring in our business and supply chains;
- comply with any applicable laws and regulations throughout the world, including but not limited to under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**); and
- establish open and effective communication channels for the reporting of actual or suspected instances or risks of modern slavery occurring in our operations and supply chains.

Pact Group has geographically diverse and wide-ranging supply chains, and at times may operate in regions where the risks of modern slavery are more prevalent than in others. We expect the same high standards from all of our contractors, suppliers and other business partners within our supply chains.

As part of our onboarding process for suppliers, we require all prospective suppliers to:

- complete our supplier questionnaire;
- confirm compliance with our Supplier Code of Conduct and this Policy;
- familiarise themselves with all of our relevant policies; and
- comply with this Policy.

Our suppliers are also required to hold their own suppliers to the same high standards.

2. Who this policy applies to

This Policy (including any updates) must be complied with and incorporated into the policies, procedures and operations of our own business and our supply chains.

This Policy applies to all employees (whether permanent, fixed term, casual or temporary), directors (executive and non-executive), officers, authorised representatives, contractors, consultants and other personnel of Pact Group, suppliers to Pact Group and any other third-party representative.

3. Overview of modern slavery

3.1 What is modern slavery?

Modern slavery generally extends to eight types of serious exploitation of individuals. These include:

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. Overview of modern slavery

3.2 What are the risk indicators?

The Australian Government has provided guidance on the risk indicators which assist in evaluating whether there is a risk of modern slavery. These include (but are not limited to) the following:

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. Overview of modern slavery

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. Minimum Modern Slavery Standards

The minimum modern slavery standards that we expect of our own business, employees and supply chain include the following:

4.1 Compliance with modern slavery laws

Compliance with all relevant modern slavery laws throughout the world, including but not limited to the Modern Slavery Act and Divisions 270 and 271 of the Criminal Code Act 1995 (Cth).

4.2 Compliance with other relevant laws

Compliance with other relevant laws throughout the world such as, for example, laws relating to minimum working age, employment conditions and wages.

4.3 Freedom of employment and association

All workers must have the right to freely choose employment and enjoy freedom of movement and association.

4.4 Safe working conditions

All workers must have safe and clean working conditions.

4.5 Freedom from discrimination

All workers must be able to work in an environment that is free from discrimination, harassment and abuse.

4.6 Due diligence

Conducting due diligence and audits across:

- internal business operations; and
- supply chains (with a focus on tier 1 suppliers).

4.7 Compliance officer

Appoint a compliance officer with responsibility for overseeing implementation and monitoring of modern slavery policies and procedures.

4.8 Training

Implement and participate in training, consultation and engagement to understand, identify and address modern slavery risks.

4.9 Remediation

Commit to provide remediation for instances of non-compliance with this Policy or modern slavery laws.

5. Responsibilities for the Policy

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 employee that suspects or is aware of modern slavery occurring in Pact Group's operations, in a supplier to Pact Group or in any upstream supplier to that supplier, should report and raise those concerns immediately in accordance with this section 5.

5.1 Role of the Board

The board of directors has the overall responsibility for ensuring that our business, our suppliers and this Policy comply with Pact Group's legal and ethical obligations in respect of modern slavery.

The Company is responsible for approving our annual modern slavery statement and ensuring that it complies with applicable laws and regulations throughout the world, including but not limited to the Modern Slavery Act.

5.2 Integrity and Ethical Sourcing Committee

The key functions of the Integrity and Ethical Sourcing Committee (**Committee**) include evaluating and recommending improvements to our approach to addressing modern slavery risks within Pact Group's operations and addressing other corporate social responsibility risks, such as corruption, sanctions and ethical sourcing.

The Committee has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness and dealing with any queries about it. The Committee's responsibilities extend to:

- monitoring and reviewing internal controls and procedures, and consulting with relevant stakeholders, to identify risks of modern slavery practices in our operations;
- monitoring and reviewing the processes in place with our contractors and suppliers to identify risks of modern slavery practices in our supply chains;
- developing measures to assess and address any risks of modern slavery, including through due diligence and contractual obligations;
- monitoring the effectiveness of those measures;
- accessing internal and external expertise, if required, on key issues such as child protection, country or sector specific risks and context specific sensitivities;
- developing appropriate training materials for our employees and, where appropriate, our suppliers to facilitate compliance with this Policy; and
- preparing our annual modern slavery statement in accordance with the requirements under applicable laws and regulations throughout the world, including but not limited to the Modern Slavery Act.

5. Responsibilities for the Policy

5.3 Modern Slavery Contact Officer

The Modern Slavery Contact Officer (Contact Officer) is the primary contact and person responsible for reporting grievances and ensuring remediation is conducted in respect of modern slavery. The Contact Officer is responsible for escalating actual or suspected instances of modern slavery to the Committee.

Any instance of suspected or actual modern slavery occurring within Pact Group's operations, our suppliers' operations, or any other business partner of Pact Group should immediately be reported to the Contact Officer at the details below.

Name General Counsel

Email modernslavery.officer@pactgroup.com

Phone + 61 3 8825 4122

5.4 Managers of all levels

Managers of all levels in Pact Group's operations are responsible for:

- ensuring that all members of their team understand and comply with this Policy and are aware of the indicators of modern slavery;
- 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;
- maintaining a working knowledge of what is happening in their operations and supply chains; and
- clearly communicating Pact Group's minimum standards regarding modern slavery.

5.5 Employees

Employees are responsible for:

- familiarising themselves with this Policy;
- participating in training in respect of modern slavery;
- complying with this Policy; and
- following the internal reporting process set out in this Policy if they become aware of or suspect modern slavery may be occurring, or there is a risk that it is occurring, within Pact Group's operations or supply chain.

5.6 Suppliers

Suppliers are responsible for ensuring that their business, employees and suppliers involved in the supply of goods or services to us understand and comply with this Policy.

6. Compliance with this Policy

You must ensure that you read, understand and comply with this Policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us (for example, our employees and contractors), on our behalf (for example, our suppliers) or under our control (for example, our subsidiaries). You are required to avoid any activity that might lead to a potential or actual breach of this Policy or any relevant laws making modern slavery an offence throughout the world (including but not limited to, Divisions 270 and 271 of the *Criminal Code 1995* (Cth)).

You must notify the Contact Officer as soon as possible if you believe or suspect that a breach of this Policy has occurred or may occur in the future. Employees must not attempt to resolve the situation without support from other areas, such as governments or trusted partners, under the guidance of the Contact Officer and/or Pact Group Legal Department as this may lead to further harm to the victim or victims.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within our business or any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Contact Officer.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Contact Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally to the Committee in accordance with this Policy.

7. Policy breaches

An employee who breaches this Policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with suppliers or other individuals or organisations working on our behalf if they breach this Policy.

8. Review of this Policy

This policy will be reviewed periodically and amended as required by the Board of the Company to ensure the effectiveness of its operation.

9. Related documents

This Policy should be reviewed in conjunction with Pact Group's other relevant policies. These include (but are not limited to), the following:

- Code of Conduct
- Global Procurement Policy
- Supplier Code of Conduct
- Whistleblower Policy

Version Control Page

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