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Modern Slavery Policy

Policy No. HR 024

Version No: 3

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Amendments

Version No.	Date	Prepared or Change By	Details	Review By
1	Dec 2020	Lisa Bremner	New Policy	
2	Dec 2023	Lisa Bremner	Updated for FSC requirements	
3	April 2024	Lisa Bremner	Updated for compliance	

1. PURPOSE OF POLICY

This policy affirms our 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.

It is consistent with our Human Resource framework, that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations. It is also consistent with the fundamental principles and broader policies of the business. As a result, this Modern Slavery Policy is part of the HR 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 .

2. CONTEXT

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.

Ego Trade / Jacpak commits to ending all forms of modern slavery, 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.

3. SCOPE

This Policy applies to all Ego Trade / Jacpak managers, staff, contractors and stakeholders.

4. 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 the Ego Trade / Jacpak.

Partnership means all relationships between Ego Trade / Jacpak and a Partner whereby Ego Trade / Jacpak 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 Ego Trade / Jacpak. This relationship includes arrangements of; sponsorships, cause-related marketing initiatives, and strategic alliances.

Risks of modern slavery practices means the potential for Ego Trade / Jacpak to cause, contribute to, or be directly linked to modern slavery through its supply chains and operations.

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 Ego Trade / Jacpak' own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

5. 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:

1. **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;
2. **Slavery**, which is where the offender exercises powers of ownership over the victim;
3. **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;
4. **Forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work;
5. **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;
6. **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;
7. **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
8. **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);

6. LAWS AND ETHICAL STANDARDS

All suppliers and business parties that Ego Trade / Jacpak deal with shall comply with all laws applicable to its business. The parties should also support and comply with the principles of the United Nations Global Compact ("UNGC"), the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work. This especially applies to:

- **Child Labour:** The Supplier shall uphold the effective abolition of child labour in accordance with Principle 5 of UNGC.
- **Forced Labour:** The Supplier shall make no use of forced or compulsory labour. There are to be no practices of the following:-
 - Physical and sexual violence

- Bonded labour
- Withholding of wages / including payment of employment fees and / or payment of deposit to commence employment
- Restriction of mobility / movement
- Retention of passport and identity documents
- Threats of denunciation to authorities.
- **Compensation and working hours:** The Supplier shall comply with the respective national laws and regulations regarding working hours, wages and benefits.
- **Workplace Health and Safety:** The Supplier must provide a safe workplace for its employees and visitors in accordance with applicable laws and guidelines.
- **Ethical Conduct:** The Supplier must act ethically in every aspect of its business, including relationships, practices, sourcing, and operations.
- **Improper payments/bribery:** The Supplier shall comply with Australian and international anti-bribery standards as stated in the UNGC as well as local anti-corruption and bribery laws. In particular, the Supplier may not offer services, gifts or benefits to IVE Group employees, temporary workers or contractors in order to influence their conduct or to any government representatives or officials as applicable. Any gifts will be returned to the Supplier.
- **Freedom of association:** Suppliers shall respect the rights of employees to lawfully associate or not to associate, with groups of their choosing, as long as such groups are legal in the country of operation. The Supplier must also respect duly elected representatives of established workers' organisations and will not discriminate or punish workers for exercising these rights. Suppliers must respect the full freedom of workers' organisations to draw up their constitutions and rules.
- **Freedom to Collective Bargaining:** Suppliers to the organisation must participate in good faith, with lawfully established worker's organisations and/or their duly elected representatives, with their best efforts to reach a collective bargaining agreement as required by law. Suppliers must ensure that collective bargaining agreements are implemented where they exist.
- **No discrimination:** Suppliers must ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination, or any other inappropriate workplace behaviour.
- **Business Partner Dialogue:** The Supplier shall communicate the principles stated in the Supplier Code of Conduct, this Modern Slavery policy as detailed to its subcontractors, Suppliers and other business partners who are involved in supplying the products and services and require such parties to adhere to the same standards.
- **Compliance with Supplier Code of Conduct:** Ego Trade / Jacpak reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier Code of Conduct. The business encourages its Suppliers and business partners to implement their own binding guidelines for ethical behaviour. Ego Trade / Jacpak also reserves the right to update and amend this Supplier Code of Conduct as determined by Ego Trade / Jacpak and notified to the Supplier and business partners.

7. EGO TRADE / JACPAK APPROACH TO LIMITING THE RISK OF MODERN SLAVERY PRACTICES

Ego Trade / Jacpak will work proactively to reduce modern slavery within our supply chains, with business partners and operations and we expect all organisations we engage with to do the same.

Supply Chain

Ego Trade / Jacpak 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 and business partners must use their best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event that a business partner or Supplier 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. Business partners and Suppliers must notify Ego Trade / Jacpak as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

Modern Slavery Policy

Ego Trade / Jacpak 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 Ego Trade / Jacpak takes to work with suppliers to reduce risks and the range of supports available for when a Ego Trade / Jacpak person becomes aware that someone is at risk of or affected by modern slavery practices.

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.

Human Resources

We are 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.

Communications, Engagement and Training

Ego Trade / Jacpak staff 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.

Staff with high purchasing responsibilities will be provided additional training on the Ego Trade / Jacpak Supplier Code of Conduct, Ego Trade / Jacpak contractual terms, and supporting suppliers to undertake due diligence.

Ego Trade / Jacpak staff 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.

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 Ego Trade / Jacpak staff, Suppliers, Business Partners and other parties in regard to the success or otherwise of the actions we have taken to reduce the risk of modern slavery.

8. REPORTING CONCERNS OF MODERN SLAVERY

Reporting unethical or unlawful conduct

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

Reports of unethical or unlawful conduct are responded to in accordance with the Whistle Blower Policy (HR 035).

9. 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 a Ego Trade / Jacpak person becomes aware that someone is at risk of or affected by modern slavery practices, regardless of if this occurs within Ego Trade / Jacpak supply chains and operations or in the broader community.

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.

10. RESPONSIBILITY

Responsibility for the implementation of the policy rests with the Managing Director and various Operations Managers. Responsibility includes ensuring all staff, suppliers and business partners are aware of the policy and the consequences of the policy. The development of appropriate procedures for the implementation of this policy, an annual program of action to ensure implementation, and monitoring as necessary.

11. BREACH OF POLICY

Ego Trade / Jacpak has a zero tolerance approach to breaches of the Modern Slavery policy. Staff who deliberately breach this policy and knowingly engage in acts of Modern Slavery or support /enable breaches of the policy will be subject to disciplinary action up to and including termination of employment.

Suppliers and Business Partners who knowingly and/or willingly breach the standards that Ego Trade / Jacpak hold in this area regarding Modern Slavery and ethical behaviours, will jeopardise their ongoing business contract and / or business relationship. Any illegal findings will be referred to the relevant authorities.