

# Anti Modern Slavery Policy for Policy Performance Pty Ltd

## Statement

This policy reflects Policy Performance Pty Ltd's commitment to ensuring to the best of our ability that there is no modern slavery in any part of our business operations. We are committed to acting ethically and with integrity in all business dealings and relationships, and where possible, to ensure modern slavery is not taking place in our own business or supply chain.

As part of our business process, we include specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude.

We expect our employees, subcontractors and other stakeholders to share our commitment to act lawfully and ethically. We will work collectively to ensure that modern slavery is not taking place within our organisation or our supply chain.

## Definitions

The term 'modern slavery' describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats and deception can be explicit or implicit.

The Modern Slavery Act 2018 (Cth) defines modern slavery as including the following eight types of serious exploitation:

- trafficking in persons
- slavery
- servitude
- forced labour
- forced marriage
- debt bondage
- deceptive recruiting for labour or services
- the worst forms of child labour.

The worst forms of child labour means extreme forms of child labour that involve the serious exploitation of children, including through enslavement or exposure to dangerous work. The worst forms of child labour does not mean all child work.

Under Australian law, modern slavery is defined in the Act. In the event of any inconsistency, the definitions in the Act take precedence over this policy.

## Scope

This policy applies to all employees and subcontractors working with Policy Performance.

## Our approach

Policy Performance is committed to upholding human rights and eliminating all forms of modern slavery and involuntary labour in our operations and supply chains. Our approach towards modern slavery is as follows:

### Risk identification:

We acknowledge that there are indirect risks associated through our service delivery chain. These can arise from our subcontractors or other suppliers such as IT hardware/software providers, printing services and travel/accommodation vendors.

To identify potential risks, we:

- document each supplier and subcontractor involved in our projects via sub-contracts that meet our requirements
- monitor indicators of exploitation such as unusually low prices, high staff turnover, excessive subcontracting and lack of transparency
- regularly review supplier conduct against the list of prohibited practices outlined in this policy (refer to [Annexure A](#))
- provide confidential reporting channels for whistleblowing by employees, subcontractors or anyone affected by our work.

### Risk assessment:

We evaluate each engagement based on the nature of services, location and known industry risks. In particular, we:

- assess work that is hazardous, low-wage or relies on migrant or low skilled workers as high risk
- consider country-specific risk ratings and labour law enforcement for overseas work
- investigate any subcontractor proposals with abnormally low pricing to ensure they do not reflect exploitative practices.

### Risk mitigation and response:

To mitigate identified risks, we:

- include modern slavery clauses in all contracts, enabling contract termination in cases of non-compliance
- maintain regular dialogue with subcontractors and may request progress reports or conduct audits if risks are identified
- take immediate action, including reporting to authorities and terminating the relationship, if a breach of our prohibited practices is confirmed.

### Training and awareness:

We ensure that all employees involved in operations, procurement and contract management receive mandatory and ongoing training on:

- how to identify signs of modern slavery
- legal and ethical responsibilities under the Act
- how to assess supplier and subcontractor practices against our standards
- how and when to escalate concerns, particularly where prohibited practices may be involved.

## Responsibilities

### Management:

- ensure this policy is effectively communicated, understood and implemented across all teams and business units
- lead by example by upholding the highest ethical standards and zero tolerance for modern slavery
- conduct regular risk assessments and ensure appropriate due diligence is undertaken when engaging subcontractors and suppliers
- provide resources and support for training and awareness initiatives related to modern slavery and ethical labour practices
- establish and maintain confidential reporting mechanisms and ensure all concerns or reports of suspected modern slavery are promptly and thoroughly investigated
- take decisive action in response to any confirmed breaches, including reporting to relevant authorities, terminating contracts and applying disciplinary measures as necessary.

### Employees

- understand and comply with this policy and all related procedures
- complete mandatory training on modern slavery risks, indicators and reporting obligations
- stay vigilant for signs of modern slavery or exploitation within their work environment or supply chains
- report any concerns or suspicions of modern slavery immediately through the designated confidential channels
- cooperate fully with investigations or audits related to potential modern slavery issues.

### Subcontractors

- adhere to this policy and ensure that their own practices and those of their subcontractors or suppliers, do not involve any form of modern slavery
- implement appropriate risk management and due diligence processes aligned with the prohibited practices outlined in this policy(refer to Annexure)
- provide transparency and cooperation during assessments, audits or investigations conducted by Policy Performance Pty Ltd or relevant authorities
- report any suspected breaches of modern slavery laws or this policy immediately to Policy Performance Pty Ltd.
- ensure their workers are aware of their rights and have safe channels to report concerns without fear of retaliation.

## Applying this policy

Policy Performance Pty Ltd seeks the co-operation of all employees, subcontractors and others affected by our work. The success of this policy depends on:

- the shared commitment of everyone to uphold ethical standards and comply with this policy
- open and effective communication between management, employees, subcontractors and stakeholders
- active participation in training, risk identification and reporting of any suspected modern slavery
- prompt and transparent action when concerns or breaches are raised.

## Monitoring and review

Policy Performance Pty Ltd will review this policy annually, in consultation with employees. The review will:

- assess how well the policy is working to prevent and address modern slavery risks
- check that the policy meets legal requirements and follows best practice
- monitor how effective related policies and procedures are, including reporting and risk management
- review any incidents or reports about modern slavery and how they were handled
- gather feedback from employees, subcontractors and stakeholders to find areas for improvement
- update the policy and processes as needed to reflect changes in laws, industry standards or our operations.

## Relevant legislation

This policy is guided by and supports compliance with the following legislation and any amendments or updates thereto:

- Modern Slavery Act 2018 (Cth)
- Crimes Act 1914 (Cth)
- Australian Human Rights Commission Act 1986 (Cth)
- Migration Act 1958 (Cth)
- Fair Work Act 2009 (Cth)
- Work Health and Safety Act 2011 (Cth)
- and other relevant International and Australian Government, State or Territory legislation as applicable.

**Authorised**

Name: Charlie Tulloch

Position: Director, Policy Performance Pty Ltd

Signature:



Date: 1 July 2025

Date of next review: 1 July 2026

# Annexure A: Prohibited practices

Policy Performance Pty Ltd prohibits any activity, conduct or practice that constitutes or contributes to modern slavery. This includes, but is not limited to, the following practices, which are strictly forbidden in our operations, engagements and supply chains:

Zero tolerance applies to any violation of these prohibitions. Employees, subcontractors, or suppliers found in engaging prohibited practices will face disciplinary action, termination of contracts, exclusion from future work and immediate reporting to authorities.

## **Labour exploitation:**

- **Forced labour:** Any work or service extracted under threat, coercion or deception and performed involuntarily.
- **Bonded labour:** Employment arrangements that require individuals to work to repay inflated or unclear debts.
- **Servitude:** Situations where an individual is not free to stop working or leave their employer due to coercion, threat or deception.
- **Withholding wages:** Denying workers their legal entitlements, including underpayment, delayed payment or non-payment.
- **Confiscation of identification documents:** Retaining passports, visas or other documents to restrict worker movement.

## **Unethical recruitment practices:**

- **Deceptive recruitment:** Misleading workers about job conditions, pay, visa status or entitlements during the hiring process.
- **Charging recruitment or placement fees to workers:** All recruitment costs must be borne by the employer or contracting entity.
- **Use of unregulated labour brokers:** Engaging intermediaries who are not transparent, accountable or legally compliant.
- **Unethical use of Artificial Intelligence (AI) in hiring:** AI or algorithmic tools must not introduce bias, remove human oversight or disadvantage vulnerable applicants (e.g., based on gender, migration status, disability or race).

## **Discrimination or exploitation of vulnerable populations:**

- **Discrimination against migrant workers, First Nations peoples, people with disability, culturally and linguistically diverse (CALD) individuals or other underrepresented groups**
- **Targeting or exploiting people in vulnerable circumstances, including but not limited to newly arrived migrants, refugees, young workers and people with low literacy or limited knowledge of legal rights.**
- **Manipulating migration or visa status such as using a worker's visa, residency or sponsorship status to threaten, control or coerce them.**

## **Child labour**

- **Worst forms of child labour including hazardous work, child slavery, trafficking or using children for illicit activities.**
- **Engagement with children below legal minimum age except where lawful and appropriately supervised as part of education or training.**

### **Coercion and control**

- Threats, violence, or intimidation: Any use of physical or psychological force to control a person's work or movement.
- Manipulation of migration status: Threatening to report or use a person's visa or migration status to control or exploit them.
- Excessive overtime or denial of rest periods: Forcing workers to work beyond lawful or safe limits, or denying rest, breaks, or time off.

### **Technology-enabled exploitation**

- Surveillance or monitoring technologies used to control or intimidate workers.
- Algorithmic decision-making in work allocation or wage calculation without transparency or recourse.

Note: This list is only indicative and not exhaustive. As new risks emerge or standards evolve, our prohibitions will be updated accordingly.