

Anti-Slavery Policy

Intent

The Assetlink Group (“Assetlink”) incorporating Assetlink Services Pty Limited, AssetFuture Pty Limited and AssetProjects Pty Limited, Anti-Slavery Policy deals with modern slavery (Policy).

This Policy:

- defines modern slavery,
- confirms that we are committed to maintaining a workplace and supply chain without modern slavery,
- identifies the responsibilities of our management and staff in relation to modern slavery,
- informs our team members about the process for reporting and investigating modern slavery practices in our business or supply chain,
- outlines the role of the Modern Slavery Committee,
- outlines what we will do in the case of substantiated instances of modern slavery,
- informs Personnel about how we will ensure people who report instances of modern slavery are protected.

This Policy applies to:

- our employees, individual contractors and officers (together, Personnel) at all levels,
- our contractors, suppliers and other business partners (together, Suppliers),
- Assetlink Holdings Pty Limited and each of our related bodies corporate, associated entities, controlled entities and business units, which must adopt appropriate policies and procedures to ensure that they are identifying, addressing and mitigating the risks of modern slavery in their operations and supply chains.

Under this Policy, we intend to:

- inform Personnel and Suppliers what modern slavery is,
- provide a procedure for dealing with complaints about modern slavery,
- encourages the reporting of modern slavery,
- inform Personnel and Suppliers of the consequences of modern slavery, including the potential for the termination of the employment or engagement of a person who engages in or permits modern slavery.

In common with most modern slavery policies, this Policy does not apply to any Personal Work-related Grievance.

Principles

Modern slavery is a violation of fundamental human rights. It is also a crime. We are committed to reducing the risks of modern slavery in our business operations and supply chains, and to managing incidents where they might occur. This commitment is important to us, as well as our stakeholders, customers and employees both in Australian and internationally.

We have zero tolerance of slavery, and we expect the same commitments from our Suppliers. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains and to ensure that there is transparency in this regard.

If any Personnel or Suppliers become aware or suspects of any instance of modern slavery in our operations or supply chains, the reporting process outlined in this Policy must be immediately followed.

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Responsible	It is the responsibility of our Executive Leadership Team to ensure this Policy complies with our legal and ethical obligations.
Accountable	The final authority for this policy lies with the Managing Director.
Consulted	When making changes to this policy consultation should be carried out with the General Manager People & Culture. Enquiries in relation to this Policy should be directed to the General Manager People & Culture.
Informed	All changes to this policy should be communicated to all team members and relevant contractors.

Operation and Incidence

Modern Slavery Defined

'Modern slavery' is a broad term that refers to any situation of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception. It also includes conduct that would constitute an offence under existing human trafficking, slavery and slavery-like offence provisions in the Commonwealth Criminal Code. It includes forms such as forced labour, debt bondage, human trafficking and child slavery.

Modern slavery can occur within a business or within the supply chain of a business (i.e. in the business of third-party Suppliers who are engaged by the principal business).

Modern slavery does not include issues such as underpayment of employees, discrimination or unfair dismissal (although such issues should be dealt with under our other policies).

Prevention of Modern Slavery in our Workplace and Supply Chain

We will prevent modern slavery in our workplace and supply chain by:

- adopting this Policy,
- keeping this Policy in a place where it can be readily accessed by our Personnel and Suppliers,
- ensuring that existing Personnel understand this Policy through training conducted by our management soon after this Policy is adopted and from time to time,
- ensuring that new Personnel are informed about the terms of this Policy during their induction,
- monitoring compliance with this Policy,
- handling complaints about modern slavery in accordance with this Policy,
- taking disciplinary action in relation to modern slavery and
- reviewing this Policy and conducting appropriate training following any review.

Our Personnel and Suppliers at all levels must familiarise themselves with and comply with this Policy (or, if applicable, take verifiable steps towards compliance).

Where appropriate we will include specific prohibitions in our agreements with our business partners and Suppliers that they must hold their own suppliers to the same standard as set out in this Policy and that they generally act in a way that is consistent with the values of this Policy.

Responsibility of our Management

Our board is responsible for putting into place actions to address risks of modern slavery in our operations and supply chains, including approving our annual modern slavery statement (if applicable) and ensuring that it complies with our disclosure obligations under Australian modern slavery legislation.

Our Modern Slavery Committee has the primary and day-to-day responsibility of investigating potential and actual incidents of modern slavery in our operations and supply chains, including breaches of this Policy. The Modern Slavery Committee's responsibilities extend to:

- monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in our operations under Australian modern slavery legislation, including in our subsidiary organisations (if any),
- developing measures to assess and address any risks of modern slavery practices, including through due diligence in our contractual relations,
- monitoring the effectiveness of those measures,
- developing appropriate training materials and programs for our employees to comply with this policy and
- preparing our annual modern slavery statement in accordance with our disclosure obligations under Australian modern slavery legislation.

The Modern Slavery Committee reports and refers matters to our board.

Our Human Resources and Procurement teams are jointly responsible for conducting modern slavery risk assessments of our operations and Suppliers.

Management must, in addition to the responsibilities of Personnel under this Policy:

- promote this Policy within their work area and ensure that those who report to them understand and comply with this Policy,
- model appropriate behaviour themselves,
- monitor the work environment to ensure that acceptable standards of conduct are observed.

Responsibility of our Personnel

Personnel must:

- read, understand and comply with this Policy,
- not engage in modern slavery and at all times avoid any activity that would be, or could give the impression of, a breach of this Policy,
- bring this Policy to the attention of any other Personnel who is being subjected to modern slavery practices,
- if another person is being subjected to modern slavery practices, offer support to that person and report that instance of modern slavery in accordance with this Policy (and if appropriate, with the consent of the person being subjected to modern slavery practices),
- assist in the investigation of complaints in accordance with this Policy and
- maintain complete confidentiality if they provide information during the investigation of a complaint.

Handling of Modern Slavery Instances

We will take action in relation to modern slavery. We undertake to:

- treat all complaints seriously,
- act promptly in an attempt to resolve complaints,

- ensure that any person who reports an instance of modern slavery will not be subjected to victimisation by either the person alleged to be responsible for the modern slavery practices or by any other person,
- provide appropriate support for both the person making the complaint and the person alleged to be responsible for the modern slavery practices. Once a complaint has been made, we will tell them of the support systems available to them. All employees will be allowed to have a support person present at all meetings conducted in relation to a complaint of modern slavery,
- ensure that the matter is dealt with in a neutral manner. The person conducting any investigation will not have been directly involved in the complaint being investigated,
- communicate the resolution process to those persons involved in the complaint. The Modern Slavery Committee will notify the parties of the procedures to be undertaken, how long it is anticipated the process will take and what those persons involved can expect will happen during and at the end of the process,
- assure that those persons involved in the resolution of the complaint will maintain confidentiality at all times,
- document the complaint, investigation and any conclusion or outcome reached. Records will be made of all meetings and interviews detailing who was present and any agreed outcomes,
- ensure that principles of natural justice are followed when a formal investigation is being conducted, including:
 - the person who is alleged to have engaged in, or be complicit in, an instance of modern slavery will be treated as innocent unless the allegations are proved to be true,
 - any allegation of modern slavery will be investigated promptly,
 - all allegations will be put to the person who is alleged to have committed the instance of modern slavery,
 - the person alleged to have committed the instance of modern slavery will be given a chance to explain his or her version of events,
 - if the complaint is substantiated, any disciplinary action taken will be commensurate with the seriousness of the matter. Any mitigating factors will be taken into account when assessing what form of discipline will be implemented.

Complaint and Investigation Process

How and when should a complaint be made:

- Every individual to whom this Policy applies has a responsibility to prevent, detect and report potential, suspected or actual incidents of modern slavery in our operations or supply chain.
- We have appointed the Modern Slavery Committee as the body responsible for investigating and taking action in relation to complaints of modern slavery.
- We encourage any person who believes they are the victim of modern slavery practices to report their complaint to the Modern Slavery Committee. A complaint may be made through an intermediary.
- We encourage any person who has witnessed instances of modern slavery to complain to the Modern Slavery Committee.
- Personnel must report any instance of modern slavery of which they are aware or suspect to the Modern Slavery Committee.
- If you are unsure as to whether a particular incident constitutes a form of modern slavery, or if you have any concerns about any issue of modern slavery in our operations or supply chain, you should contact the General Manager People & Culture.

Handling of a Complaint

The Modern Slavery Committee will:

- address the complaint in the strictest confidence,
- listen to the complainant seriously, sensitively and sympathetically,
- document the complaint, take accurate notes and check the accuracy of all details with the complainant,
- allow the complainant to bring another person to the interview (a complainant's support person should not be a potential witness as it may compromise the evidence),
- determine whether a formal, in-depth investigation is required and conduct an investigation into the matters disclosed in accordance with clause 8.3 as soon as practicable after the matter has been reported,
- act impartially at all times.

If a complaint is not escalated to investigation (e.g. because the complaint is baseless), the Modern Slavery Committee will decide whether or not any person named in the complaint should be informed that a suspicion was raised and found to be baseless upon preliminary review.

Investigation of a Complaint

After the Modern Slavery Committee has determined that a formal, in-depth investigation is required the Modern Slavery Committee will investigate the complaint. The Modern Slavery Committee may determine that an external investigator shall investigate the complaint.

Any investigator must have internal independence of line management in the area affected by the complaint.

The investigator must conduct any investigation in an objective and fair manner, and as is reasonable having regard to the nature of the complaint and the circumstances.

During the course of the investigation, the Modern Slavery Committee (or any other investigator) will:

- advise any Personnel who is the subject of a complaint about the subject matter of the complaint as and when required by principles of natural justice and procedural fairness and prior to any actions being taken,
- interview any witnesses and act with discretion when obtaining information from any witness,
- keep witness involvement to the minimum necessary to establish the facts,
- keep an accurate record of all information gathered in the course of the investigation - all interviews with the complainant, the accused person and any witnesses should be documented with as much information as possible including dates, details of specific incidents and frequency of occurrences,
- allow the parties to the complaint and any witnesses the opportunity to review, correct and endorse their record of interview,
- outline the process of investigation and resolution to the accused person and the expected time to complete the process,
- explain the possible outcomes to the accused person.

The Modern Slavery Committee (or any other investigator) may determine the most appropriate time to inform the individual who is the subject of a complaint about the investigation, provided that they inform the individual before making any adverse finding against them. In some circumstances, informing the individual at an early stage of an investigation may compromise the effectiveness of the investigation.

After the Investigation

After completing an investigation, the Modern Slavery Committee must decide:

- whether or not there has been any instance of modern slavery or
- if it is not possible to find whether any instance of modern slavery has occurred.

The Modern Slavery Committee must:

- prepare a report for our board of directors which documents the investigation process, the evidence, and the finding,
- inform both parties of the decision and the reasons for the decision.
- If the Modern Slavery Committee finds that any instance of modern slavery has occurred, the Modern Slavery Committee must recommend to our board of Directors steps to deal with that decision and the board will make its decision under Clause 9.
- We must then act to deal with the instance of modern slavery.

Breach of Policy

We take any breach of this Policy by our Personnel and/or Suppliers seriously and will pursue disciplinary action against Personnel and Suppliers who we find have engaged in activity that amounts to modern slavery.

We may terminate our relationship with any Supplier working on our behalf if:

- the Supplier breaches this Policy,
- an individual or organisation working on behalf of the Supplier engages in an act of modern slavery with the Supplier's knowledge.

Breaches of this Policy by Personnel may lead to disciplinary actions being taken, including but not limited to:

- dismissal, suspension or change in role,
- counselling or warning that if he or she engages in further impugned activity, he or she may be dismissed,
- being required to provide a formal public or private apology, whether verbally or in writing.

In respect of any Personnel who is the victim of any instances of modern slavery, we may:

- re-credit annual leave taken because of the circumstances that constituted the instance of modern slavery,
- pay for medical or counselling fees associated with the instance of modern slavery,
- grant leave during investigation of the instance of modern slavery,
- transfer that person out of the environment with unpleasant associations but with no job disadvantage.

Unsubstantiated Complaints

If the Modern Slavery Committee finds that an instance of modern slavery has not occurred or that the evidence does not prove that modern slavery has occurred, the reasons for this conclusion must be explained to the complainant.

In the case of Personnel, any deliberate false reports under this Policy which relate to Personal Work-related Grievances will not be tolerated. A Personal Work-related Grievance means a grievance that relates to a Person's employment and have, or tend to have, personal implications for that Person, but do not:

- have any other significant implications for us (or our related bodies corporate) or
- relate to any conduct, or alleged conduct, about an instance of modern slavery.

If there is strong evidence that the complaint made was vexatious or malicious, the complainant may be subjected to disciplinary action.

Complainant Protection

No Personnel may engage in conduct that causes detriment, or threaten (whether express or implied, or conditional or unconditional) to cause detriment, to a person who makes a complaint under this Policy (or another person) if:

- the person believes or suspects that the complainant (or another person) made, may have made, proposes to make or could make a complaint under this Policy
- the belief or suspicion is the reason, or part of the reason, for the conduct.

Detriment includes but is not limited to:

- dismissal of an employee,
- injury of an employee in their employment,
- alteration of an employee's position or duties to their disadvantage,
- discrimination between an employee and other employees (and those of our related bodies corporate),
- harassment or intimidation of a person,
- harm or injury including psychological harm of a person,
- damage to a person's property, reputation, business or financial position,
- any other damage to a person.

However, the following actions are not detrimental conduct:

- administrative action that is reasonable for the purpose of protecting a complainant (or other person) from detriment (e.g. moving a person who has made a complaint about their immediate work area to another office to prevent them from detriment);
- managing a complainant's unsatisfactory work performance in line with our performance management framework.

If you believe that you have suffered any such treatment, you should inform the Modern Slavery Committee immediately.

The Modern Slavery Committee must keep in contact with the complainant and any witnesses throughout the investigation process to ascertain if they have suffered or been threatened detriment as a result of the complaint or its investigation.

Defamation

Defamation is the publication or making of a statement about someone, which lowers their reputation or leads other people to avoid or shun them. A person who makes a defamatory statement is liable, which means that a person who makes a complaint or repeats a complaint may be liable, unless one of the defences to a defamation claim is available.

It is not defamatory to complain of modern slavery to the person allegedly responsible for the modern slavery practices only, as this does not damage the accused's reputation with others.

A defence against defamation will generally be available where the complaint of modern slavery is made to someone who has a legitimate and genuine interest in knowing about the incident, such as the Modern Slavery Committee or our management, so long as the complaint is published in good faith.

A defence will also generally be available to the publication of the complaint by a person with a legitimate and genuine interest in resolving the complaint, such as the Modern Slavery Committee or our management, but only in relation to the publication of the complaint for purposes necessary to properly deal with the complaint. For example, it would generally be appropriate for the Modern Slavery Committee to publish the complaint to persons who witnessed the subject matter of the complaint, in order to investigate the complaint, but it would generally not be appropriate to publish the complaint to Personnel generally.

Further Action

If a complainant is not satisfied with the handling of the complaint or decision made following an investigation of the complaint, they may contact their union or the Human Rights and Equal Opportunity Commission for assistance.

End of Policy