



# MODERN SLAVERY

## POLICY



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## Policy Statement

Southland Filtration recognises the importance of protecting human rights. The Company is committed to protecting the rights of all people including Workers, the communities in which Southland Filtration operates, those who may be impacted by its activities, its customers, and those within our supply chains.

The Company recognise that one of the major human rights risks facing The Company is the existence of modern slavery in the Company's supply chain. This reflects the fact that The Company has global operations and has a supply chain that procures a range of goods and services which may be from multiple countries around the world. Modern slavery has the potential to exist in the supply chain through a variety of circumstances including:

- Forced labour
- Child labour
- Debt bondage
- Human trafficking
- Abuse of requirements for a minimum living wage
- Discriminatory employment practices

The management of modern slavery risks falls within our overall approach to protecting human rights.

The Company recognises and promotes essential standards of personal and corporate conduct. The behaviour expected

of all Workers including contractors, suppliers and business partners is included in our ethics, corporate conduct policies.

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. The Company contributes by ensuring our own supply chains and operations don't contribute to modern slavery practices.

The overall approach to the eradication of modern slavery is to ensure all suppliers are aware of our required standards. The Company requires suppliers to provide a declaration in relation to their own business activities.

## Purpose

To confirm the commitment and contribution to ending all forms of modern slavery. The policy outlines:

- A Reduction in the risk of modern slavery practices within our supply chains and operations.
- Consistent approach to ethics including compliance with applicable laws, contractual and other obligations.
- Supports the intention of international conventions, treaties and protocols relevant to combatting modern slavery and, in Australia, the Modern Slavery Act (Cth) 2018.

## 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 the types of serious exploitation and outlined in this document.

**Operations** is defined as activity undertaken by The Company.

**Partnership** means all relationships between The Company and a Partner.

**Suppliers** is defined as any organisation or person who provides us with goods or services, including their subcontractors, agents, related entities and consultants.

**Supply chain** is defined as the products and services (including labour) that contribute to The Company products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

## Modern Slavery

Modern slavery is defined in Australia by the Modern Slavery Act (Cth) 2018 to include eight types of serious exploitation. These include:

- 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;
- slavery, which is where the offender exercises powers of ownership over the victim;

- 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;
- forced labour, which is where the victim is either not free to stop working or not free to leave their place of work;
- 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.
- 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;
- 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;
- 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.
- 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 or financing a business involving servitude or forced labour.

### **LIMITING THE RISK OF MODERN SLAVERY PRACTICES IN THE SUPPLY CHAIN**

The Company will work proactively to reduce modern slavery within the supply chains and operations.

The Company expects Suppliers will operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed.

Suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event Suppliers identify any occurrence of, or material risk of modern slavery they are to take practical and effective steps to address that occurrence or risk.

Suppliers must notify The Company as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

Our contractual terms require compliance with Australian modern slavery laws and those foreign modern slavery laws that apply in the location(s) in which they operate.

## Company Operations

The Company operations are required to conform to the laws and regulations in the jurisdiction in which they operate. Beyond regulatory compliance the Ethics Policy sets out the standards required at every The Company operation.

## Human Resources

The Company is committed to ensuring the health, safety and wellbeing of our workforce and we maintain a suite of policies that reflect fair work and workplace health and safety laws in each jurisdiction in which we operate.

### **COMPANY RESPONSE TO POTENTIAL INCIDENTS OF MODERN SLAVERY**

The Company will work with our suppliers to address any identified risk of modern slavery. This includes but is not limited to:

- Encouraging our Suppliers to assess their operations;
- Working with the Supplier to eliminate the risk;
- Reporting the risk to the relevant authority;
- Terminating the supply agreement where the risk cannot be addressed to the satisfaction of the company.

The Company will take a risk management approach to respond to any identified risk of modern slavery in our own operations. This may include but is not limited to:

- Assessing the risk of modern slavery;
- Investigating any identified risk;
- Reporting any illegal behaviour or occurrence to the relevant authority;
- Implementing controls to minimise or eliminate the risk.

The Company recognises that the often-hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. We recognise that 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.

### **MODERN SLAVERY ASSESSMENT**

The Company is committed to applying a continuous improvement approach to reduce the risk of modern slavery practices within the supply chains and operations.

The Company will seek feedback from Staff, Suppliers, Partners and other parties in regard to the success or otherwise of the actions we have taken to reduce the risk of modern slavery.