



Modern Slavery Policy

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1. PURPOSE

Business plays an important role in respecting and promoting human rights and eradicating Modern Slavery. We recognise that Modern Slavery is a growing and complex problem, best tackled by collective commitment and responsibility to bring it to an end and we are committed to working with all our stakeholders to fulfil this common goal.

If the Policy is breached, we will act as quickly as practicable to remedy our adverse impacts on workers, individuals or communities and we will engage directly with affected stakeholders.

The Australian Modern Slavery Act 2018 requires AWH to make annual public reports (**Modern Slavery Statements**) on the actions of the business to address Modern Slavery risks in our Operations and Supply Chains.

The purpose of this Policy is to ensure that AWH:

- 1.1. is compliant with local, national and other applicable Modern Slavery laws and regulations in the areas in which AWH operates;
- 1.2. sources products and services in accordance with legal obligations and community expectations while working with Suppliers to improve their social and environmental practices;
- 1.3. acts to prevent, mitigate and, where appropriate, remedy Modern Slavery in our Operations and Supply Chains.

2. APPLICATION

This Policy applies to all Staff and Suppliers of AWH.

The principles of this Policy must be complied with and incorporated into other AWH policies.

This Policy should be read in conjunction with AWH Code of Conduct and Whistleblower Policy.

3. PRINCIPLES

- 3.1. AWH adopts policies and procedures to ensure that it is addressing Modern Slavery risks in its Operations and Supply Chains.
- 3.2. As far as practicable, AWH will include in its Operational and Supplier contract terms, requirements that Suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate.
- 3.3. AWH will, as far as practicable, use in its Operational and Supplier contract terms that require Suppliers to:
 - 3.3.1. comply with the *Minimum Standards Expected of Suppliers* set out in Annexure A of this Policy as amended from time to time (**Minimum Standards**);
 - 3.3.2. provide AWH with rights of termination if a Supplier is unable or unwilling to work towards full compliance with the Minimum Standards.
- 3.4. As far as practicable, Suppliers must be:
 - 3.4.1. encouraged to exceed the Minimum Standards, and promote best practice and continuous improvement; and

- 3.4.2. monitored for compliance with the Minimum Standards through Supplier assessment processes as appropriate for AWH, taking into account all relevant risk factors.

4. STANDARDS OF BEHAVIOUR FOR STAFF

- 4.1. Addressing Modern Slavery risks is the shared responsibility of all who are bound to comply with this Policy.
- 4.2. In performing employment duties and functions, the behaviour and conduct of Staff must be informed by AWH's commitment to address Modern Slavery. This includes:
 - 4.2.1. avoiding any activity that might lead to, or suggest, a breach of this Policy or any other relevant policy;
 - 4.2.2. exercising their best professional and ethical judgement;
 - 4.2.3. carrying out duties and functions with integrity and objectivity, in accordance with AWH's Commitments and AWH's Code of Conduct;
 - 4.2.4. treating concerns or issues raised about Modern Slavery with respect, impartiality, courtesy and sensitivity;
 - 4.2.5. when required, investigating and responding to allegations of Modern Slavery fairly and reasonably, with due regard to procedural fairness;
 - 4.2.6. applying the principles for addressing Modern Slavery set out in clause 3; and
 - 4.2.7. reporting and appropriately escalating any issues of concern in accordance with clause 7.

5. STANDARDS OF BEHAVIOUR FOR SUPPLIERS

AWH expects that its Suppliers will:

- 5.1. demonstrate their commitment to identifying, assessing and addressing Modern Slavery in their Operations and Supply Chains in the jurisdictions in which they operate. This includes taking measures to:
 - 5.1.1. identify and mitigate Modern Slavery risks;
 - 5.1.2. hold their own Suppliers to appropriate standards and undertake risk-based Modern Slavery due diligence of their own Operations and Supply Chains; and
 - 5.1.3. evaluate the effectiveness of these actions;
- 5.2. work collaboratively with AWH to prevent, mitigate and, where appropriate, remedy Modern Slavery in their Operations and Supply Chains;
- 5.3. complete supplier questionnaire which is entitled *Supplier Questionnaire – Identifying Modern Slavery Risks* and is annexed to this Policy as Annexure B, as amended from time to time.

6. REPORTS & RECORDKEEPING

- 6.1. The ELT must monitor and review the effectiveness of the policies and procedures referred to in clause 3.1 above, taking into account their suitability, adequacy and effectiveness as per the risk assessment.
- 6.2. The ELT, in consultation with the AWH Board of Directors, must prepare the annual Modern Slavery Statement in accordance with the requirements of the Modern Slavery

Act. This statement will be lodged the Australian Government's Online Register for Modern Slavery Statements

6.3. General Managers must create and maintain appropriate records of decisions made and actions taken under this Policy.

6.4. Records must be stored securely in AWH's corporate recordkeeping system.

7. REPORTING INCIDENTS OR CONCERNS OF MODERN SLAVERY

7.1. Staff are encouraged to report and appropriately escalate concerns about possible Modern Slavery to a member of the ELT, at the earliest possible opportunity.

7.2. Some reports may be protected under AWH's Whistleblower Policy.

8. POLICY AMENDMENT

This Policy will be regularly reviewed and revised where necessary to ensure it continues to evolve and reflect community expectations.

9. REFERENCES

9.1. **Child Labour** means any work by a Child or Young Person, which does not comply with the provisions of the relevant International Labour Organisation (ILO) standards, and any work that is likely to interfere with that person's education, or to be harmful to that person's health or mental, spiritual, moral or social development.

9.2. **Child** means a person under the age of 15, or below the age at which school attendance is not compulsory under local law, whichever is older, and **Children** means more than one Child.

9.3. **ELT** means the AWH Executive Leadership Team.

9.4. **Modern Slavery** means situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom and includes the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced marriage, the sale and exploitation of Children, debt bondage and deceptive recruiting for labour or services.

9.5. **Modern Slavery Act** means the Modern Slavery Act 2018 (Cth) enacted by the Parliament of Australia on 29 November 2018 (as amended from time to time).

9.6. **Operations** means an activity controlled by AWH.

9.7. **Principles of Remediation** means a program enabling Children and underage workers to return to quality education and establish and implement effective systems to prevent the use of Child labour in the future.

9.8. **Staff** means employees, including casual employees, of AWH.

9.9. **Suppliers** means an organisation or person who supplies goods or services, and includes their officers, directors, subcontractors, agents, related entities and consultants.

9.10. **Supply Chain** means the products and services (including labour) that contribute to AWH's own products and services.

9.11. **Young Person** means a person under the age of 18 but not classified as a Child.

ANNEXURE A – MINIMUM STANDARDS EXPECTED OF SUPPLIERS	
No forced or bonded labour	<p>Employment shall be freely chosen. Suppliers shall:</p> <ol style="list-style-type: none"> 1. not use any type of forced labour (any work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person), bonded labour (work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker’s labour in exchange) or indentured labour (in which an employer forbids workers from leaving employment at the worker’s discretion); 2. respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment; and 3. ensure that workers are free to leave their employer after reasonable notice.
No Child labour	Suppliers shall comply with the minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (ILO) Convention 138. Suppliers must be able to verify the age of all employees to ensure compliance. Suppliers must accept the Principles of Remediation of Child and under age workers, and where such labour is discovered, Suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of Child labour in the future.
Wages, benefits, and transparent record keeping	Suppliers must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits. Record keeping must be accurate and transparent. Workers must be provided with written and understandable information about their employment conditions before they enter employment and about their wages for each pay period. Deductions from wages for disciplinary measures or any deductions from wages not provided for by law shall not occur without the express permission of the worker concerned. All disciplinary measures should be recorded.
Working hours	Working hours must comply with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable ILO convention. Overtime shall be agreed, shall not be excessive, shall not be requested on a regular basis and shall be compensated as prescribed by applicable local laws.
No discrimination	All conditions of employment must be based on an individual’s ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation. 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.
No harassment or abuse	Workers shall be treated with dignity and respect. In particular, Suppliers will provide a workplace free from harassment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.

<p>Freedom of association, grievance mechanisms and recourse</p>	<p>Suppliers shall respect the rights of workers to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country of Operation. Workers should have the right to join or form trade unions of their choosing. Suppliers should not interfere with, obstruct or prevent legitimate related activities, such as collective bargaining. Workers are allowed to select worker representatives. Representatives should not be discriminated against and should have regular access to company management or appropriate process in order to address grievances and other issues.</p> <p>Suppliers must have a Policy in place for workers to approach management on issues of concern, on their own or through worker representatives, confidentially.</p>
<p>Working conditions</p>	<p>Suppliers shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied and workers trained in their use. Where Suppliers provide accommodation, it shall be clean, safe and meet the basic needs of workers. Workers will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation. Workers have the right to refuse work that is unsafe.</p>
<p>No bribery</p>	<p>Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise. Suppliers shall keep accurate records of all payments made and received in cash or in kind, for audit purposes.</p>
<p>Sub-contracting</p>	<p>Where sub-contracting is permitted, Suppliers must have adequate processes in place for properly managing sub-contracting to ensure that subcontractors operate in accordance with this and any applicable divisional/business unit Policy, and is undertaken strictly in accordance with the contract.</p>
<p>Environmental compliance</p>	<p>Suppliers shall comply with relevant local and national environmental protection laws and will as far as practicable comply with international environmental protection standards.</p>
<p>Animal welfare</p>	<p>Suppliers must ensure animals are treated humanely and with respect.</p>
<p>Migrant workers</p>	<p>Migrant workers shall have the same entitlements as local workers as stipulated by local law. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer. The employer must not require the worker to surrender identification documents. Workers employed through a third party agent or contractors are the responsibility of the Suppliers, and are thus covered by these Minimum Standards.</p>
<p>Hiring and regular employment</p>	<p>Suppliers must provide each worker with a clear, understandable labour contract containing all legally required employment terms, entitlements and conditions. In addition, where possible, Suppliers should work towards providing permanent employment for workers and avoid labour-only contracting arrangements, consecutive short-term contracts, excessive piece-work or false apprenticeship schemes to avoid obligations of regular employment to workers.</p>



ANNEXURE B - QUESTIONNAIRE

Supplier Questionnaire – Identifying Modern Slavery Risks

Purpose of the questionnaire

The purpose of this questionnaire is to help AWH to assess the risk of modern slavery in our supply chain.

Suppliers are asked to complete the Questionnaire honestly and with as much detail as possible. The completed Questionnaires will be confidential.

Instructions for completing the questionnaire

This is an initial request for information and we may ask for further information in due course.

Please provide:

- your responses to the questionnaire, including appropriate supporting documents within seven business days;
- updated responses as more information becomes available or if subsequent events make any earlier responses inaccurate.

1. STRUCTURE	
1.1. Organisation name	
1.2. Organisation address	
1.3. Australian Company Number (ACN)	
1.4. Australian Business Number (ABN)	
1.5. Parent company (if applicable)	
1.6. Contact person	
1.7. Contact email	
1.8. Contact phone	
1.9. Date of Questionnaire completion	
2. REPORTING OBLIGATION	
2.1. Is your organisation required to report under the Modern Slavery Act (Cth) 2018?	Yes <input type="checkbox"/> No <input type="checkbox"/>
3. POLICIES	
3.1. Does your organisation have any written policies and procedures relating to: <ul style="list-style-type: none"> ▪ modern slavery; ▪ human rights; ▪ ethical trading; or ▪ whistleblowing? 	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please provide details: If yes, how frequently are the updated? Click or tap here to enter text.
3.2. Does your organisation agree to comply with the <i>AWH Modern Slavery Policy</i> and <i>Minimum Standards Expected of Suppliers</i> ?	Yes <input type="checkbox"/> No <input type="checkbox"/>

4. SUPPLY CHAIN MANAGEMENT	
4.1. Who are your organisation's key direct and indirect suppliers and subcontractors for the supply of goods and services and in which countries do they primarily operate?	
4.2. Does your organisation perform screening of all prospective suppliers to assess the risks of modern slavery or other human rights harms that may occur in its operations and supply chains?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please provide details:
4.3. Are there any sections of your organisation or your organisation's supply chain that present a particular modern slavery risk?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please provide details:
4.4. Are you aware of low-skilled migrant workers working in your organisation's supply chains?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please provide details:
4.5. Are you aware of any ongoing investigations or charges within your supply chain in relation to modern slavery and other abuses?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please provide details:
4.6. What action would your organisation take if modern slavery practices are suspected?	
5. COMPLIANCE	
5.1. Have there been any reports of or concerns raised regarding modern slavery in your organisation or supply chains?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please provide details: Click or tap here to enter text.
5.2. Is there a mechanism to encourage concerns about modern slavery to be raised so that they can be investigated?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please provide details: Click or tap here to enter text.
6. TRAINING	
6.1. Does your organisation provide modern slavery training to staff and subcontractors?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, provide details on how, when and to whom is training provided: Click or tap here to enter text.



7. DECLARATION

This Questionnaire is required to be signed by a duly authorised representative of the organisation.

I declare that:

- I am duly authorised to make representations on behalf of the organisation; and
- the information provided here is true, complete and correct.

.....
Signature of Authorised Person

.....
Name of Authorised Person

.....
Position of Authorised Person

.....
Date