



Anti-Slavery – Policy Statement

Modern slavery is a criminal offence and a severe violation of fundamental human rights. It manifests in various forms, including slavery, servitude, forced and compulsory labour, and human trafficking. All these forms share the common element of one person depriving another of their freedom in order to exploit them for personal or commercial gain.

The Company maintains a zero-tolerance stance towards modern slavery. We are committed to conducting our business dealings and relationships with ethical integrity and to establishing and enforcing robust systems and controls to prevent the occurrence of modern slavery within our business operations and supply chains. We also pledge to maintain transparency within our operations and in our efforts to combat modern slavery across our supply chains, aligning with our disclosure obligations under the Modern Slavery Act 2018.

We hold all our contractors, suppliers, and other business partners to the same high standards. As part of our contracting processes in the upcoming year, we will incorporate explicit prohibitions against the use of forced, compulsory, or trafficked labour, and against any form of slavery or servitude, regardless of whether it affects adults or children. We expect our suppliers to impose these same high standards on their own suppliers.

This policy is applicable to all individuals working for us or on our behalf, regardless of their role, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. It is important to note that this policy does not constitute part of any employee's employment contract and may be amended at any time.

Policy Oversight

The Company bears the ultimate responsibility for ensuring that this policy adheres to our legal and ethical obligations, and that all individuals under our control comply with it. The Company is tasked with the primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, addressing any related queries, and auditing internal control systems and procedures to verify their effectiveness in combating modern slavery.

Management at all levels share the responsibility of ensuring that those under their supervision comprehend and adhere to this policy. They are also responsible for providing adequate and regular training on this policy and on the issue of modern slavery within supply chains.

We welcome your input on this policy and encourage you to suggest ways in which it can be improved. Comments, suggestions, and queries should be directed to the Managing Director.

Compliance with the Policy

It is imperative that you read, comprehend, and adhere to this policy. The responsibility for preventing, detecting, and reporting modern slavery within any aspect of our business or supply chains lies with all individuals working for us or under our control. You are obligated to refrain from engaging in any activity that could lead to or imply a violation of this policy. If you suspect or believe that a conflict with this policy has occurred or may occur in the future, you must promptly inform your line manager or a company Director.



You are encouraged to raise concerns about any issue or suspicion of modern slavery within any part of our business or within any tier of our supplier chains at the earliest possible stage. In the event you suspect or believe a breach of this policy has occurred or may occur, you must notify your line manager or a company Director as soon as possible.

Please be aware that, when appropriate and with the safety and well-being of local workers as a primary concern, we will offer support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices within their own business and supply chains.

If you are uncertain about whether a particular action, the treatment of workers in general, or their working conditions within any tier of our supply chains constitute any of the various forms of modern slavery, please bring it to the attention of your line manager or company Director.

Our goal is to foster an environment of openness and support for anyone who, in good faith, raises genuine concerns under this policy, even if those concerns turn out to be unfounded. We are committed to ensuring that no one suffers adverse treatment as a result of reporting in good faith their suspicion that modern slavery in any form is taking place in any part of our business or within any of our supply chains. Detrimental treatment includes dismissal, disciplinary actions, threats, or any other unfavourable treatment related to raising a concern. If you believe you have experienced such treatment, please promptly inform your line manager. If the matter remains unresolved and you are an employee, you should formally raise it with your line manager or company Director.

This Modern (Anti) Slavery Policy and Statement is intended for businesses in all countries, with a particular focus on Australia.

Communication and Awareness of this Policy

Training on this policy, including the risks our business may face from modern slavery in its supply chains, is included as part of the induction process for all individuals working for us. Updates will be communicated using established methods of communication between the business and you.

Our unwavering stance against modern slavery must be conveyed to all suppliers, contractors, and business partners from the outset of our business relationship with them and reinforced as necessary.

Breaches of this Policy

Any employee found in breach of this policy will be subject to disciplinary action, which could lead to dismissal for misconduct or gross misconduct. Individuals and organisations working on our behalf may have their relationship with us terminated if they breach this policy.

Ian Quaye | CPEng | MIEAust | NER | RPEQ | GSAP

A handwritten signature in blue ink, appearing to read "Ian Quaye".

Managing Director | Concept Commissioning

2023