

1. Scope of this Policy

This policy applies to all persons working for or on behalf of, or providing services to, Defries Industries in any capacity, including all Suppliers, employees, directors, officers, agency workers, contractors, consultants and any other third-party representatives ('Parties').

This policy outlines Defries' approach to reducing the risk of modern slavery within our business (including our associated entities) and all supply chains.

2. Definitions

Associated Entities has the meaning given to it by section 50AAA of the *Corporations Act 2001* (Cth).

Criminal Code means the *Criminal Code Act 1995* (Cth).

Defries means Defries Industries Pty Ltd (ACN 005 685 085) and all Associated Entities

Modern Slavery Legislation means the *Modern Slavery Act 2018* (Cth) ('the Act') and all future State and Territory modern slavery legislation (as amended from time to time).

Modern slavery means those matters defined in Paragraph 3 of this policy and the Act, which includes but is not limited to conduct which would constitute:

- a) an offence under Division 270 or 271 of the Criminal Code; or
- b) an offence under either of those Divisions if the conduct took place in Australia; or
- c) trafficking in persons, as defined in the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; or
- d) the worst forms of child labour, as defined in Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

Suppliers is defined as any organisation or person who provides Defries with goods or services, including their subcontractors, agents, Associated Entities and consultants.

Supply Chains is defined as the products and services (including labour), and the providers of those products and services, that contribute to Defries' own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct Suppliers.

3. What is modern slavery

Modern slavery is defined by Modern Slavery Legislation to include eight serious exploitations which can be summarised as:

- **trafficking in persons** - the recruitment, harbouring and movement of a person for exploitation through modern slavery;
- **slavery** - where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way;
- **servitude** - 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** - where the victim is either not free to stop working or not free to leave their place of work;
- **forced marriage** - 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** - 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** – where children are:
 - exploited through slavery or similar practices, including for sexual exploitation; or
 - engaged in hazardous work which may harm their health, safety or morals; or
 - used to produce or traffic drugs; and
- **deceptive recruiting for labour or services** where the victim is deceived about whether they will be exploited through a type of modern slavery.

4. Defries' response to Modern Slavery

Defries is committed to eliminating Modern Slavery in all forms by eliminating Modern Slavery from its business and supply chains.

Defries complies with all Australian Workplace Relations Legislation (including but not limited to the *Fair Work Act 2009* (Cth)) and provides all employees with at least the minimum guaranteed entitlements of an employee in Australia.

Defries has a zero-tolerance policy in relation to Modern Slavery in its Supply Chains.

All Parties will be expected to comply with this policy and the standards provided therein and will be provided a copy of this policy as soon as reasonably practicable upon engagement with Defries.

This policy will be used to underpin and inform any statement on Modern Slavery that Defries is required to produce in its compliance with Modern Slavery Legislation, as required from time to time.

5. Defries' Supply Chain

Defries expects all Suppliers and Supply Chain members to comply with this policy and the values set out within.

Suppliers will be required to complete the Defries Modern Slavery Questionnaire to assist Defries in undertaking an assessment of any risk of Modern Slavery in its Supply Chain.

Suppliers are expected to seek similar information from their Suppliers to ensure that they can accurately complete the Defries Modern Slavery Questionnaire.

Suppliers are required to report any breach of the Modern Slavery Legislation, or any instances of Modern Slavery in its supply chain, to Defries immediately.

6. Defries Employees

All Defries employees are required to comply with this policy and follow Defries' values in relation to abolishing Modern Slavery.

Employees are required to advise Defries of any instances or suspected instances of Modern Slavery in Defries' supply chain.

7. Breaches of this Policy

Any employee, director or officer of Defries who breaches this policy or does not advise Defries of any instances or suspected instances of Modern Slavery in Defries' supply chain will be subject to disciplinary action, up to and including termination of employment.

Any contractor, consultant, third party provider, Supplier or any Supply Chain member who Defries is made aware is not complying with Defries' zero tolerance approach to Modern Slavery will be provided a reasonable opportunity to respond to any allegations, failing which Defries will cease involvement with that entity or individual.

8. Reporting Concerns of Modern Slavery

A key part of Defries' zero tolerance approach to Modern Slavery is enabling all employees/officers/directors, Suppliers, Supply Chain members or any third party (including the public) to speak up when there are reasonable grounds to suspect that Defries, its employees/officers/directors, Suppliers or Supply Chain members are not acting in accordance with Modern Slavery Legislation or this policy.

Reports of instances or suspected instances of Modern Slavery can be made as follows:

1. Calling Defries on 1300 550 278;
2. Emailing Defries at sales@defries.com.au; or
3. Speaking directly to your manager or direct contact at Defries.

Alternatively, in Australia, the Australian Federal Police is responsible for investigating suspected cases of Modern Slavery and can be contacted on 131 237 or 02 5126 0000.

Contact can be made anonymously.