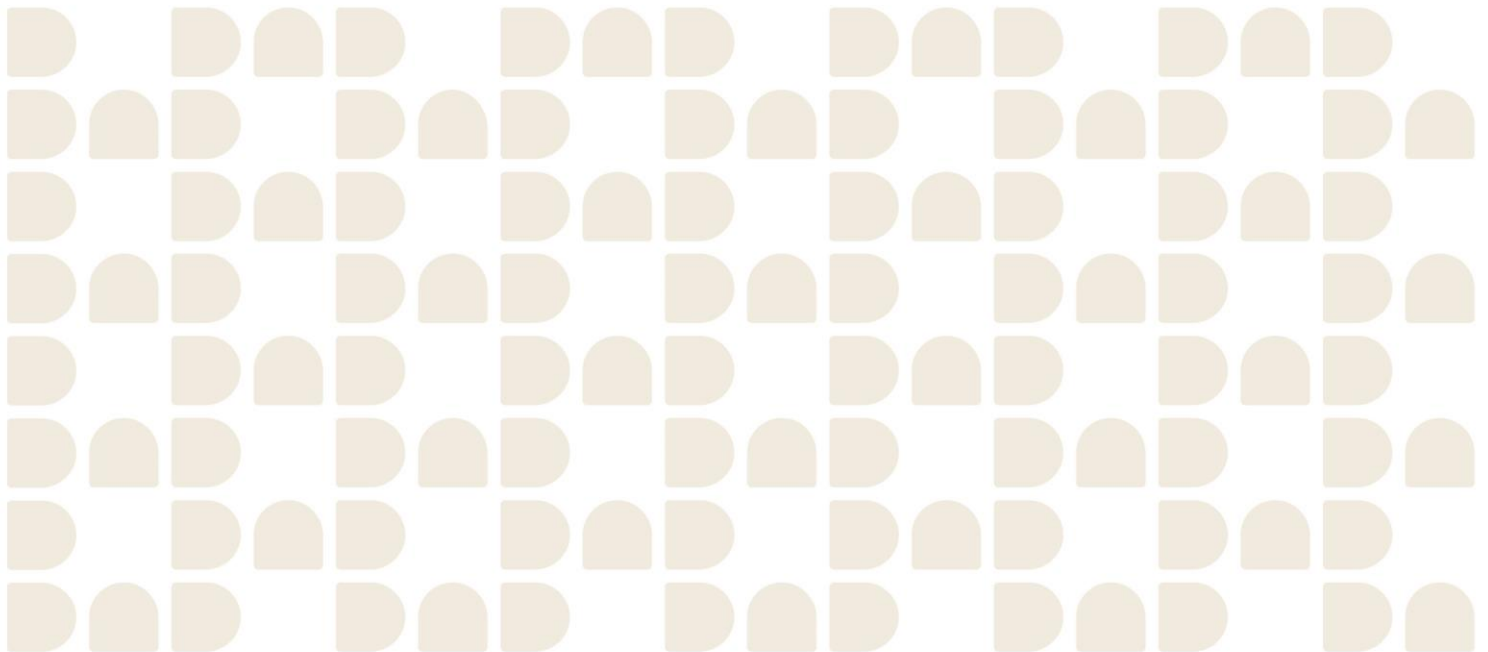

Policy | Modern Slavery

Responsible Business

Date of last review	April 2025
Date of next review	April 2028
Status	Active
Owner	Business Services Responsible Business
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Introduction

Barry Nilsson (BN) is dedicated to acting with the highest ethical standards and integrity in all that we do. We are deeply committed not just to the outcomes we achieve, but also how we achieve them. At the core of our values is an unwavering commitment to human rights, and we have zero tolerance for modern slavery in any form.

Modern slavery is a global and complex human rights issue affecting both governments and businesses. It encompasses exploitative practices such as debt bondage, servitude, child labour, forced labour, and human trafficking. With over 40 million people estimated to be victims worldwide, it is an urgent challenge that demands our attention. As a reporting entity under the Modern Slavery Act 2018 (Cth), we fully embrace our responsibility to combat this issue. We recognise the vital role organisations like ours play in preventing worker exploitation and protecting vulnerable individuals.

Purpose

This policy sets out our commitments and expectations in our operations and supply chain to prevent modern slavery. Our Human Rights Grievance Procedure and Whistleblower Policy have been implemented to provide a safe environment for concerns to be disclosed.

This Policy is guided by the principles and rights set out in *The United Nations Universal Declaration of Human Rights*, *The United Nations Guiding Principles on Business and Human Rights*, *The Convention on the Rights of the Child*, and *The International Labour Organization's Fundamental Conventions*.

Scope

The policy applies to all staff as defined in the policy.

Definitions

Definitions related to all policies are outlined in BN's Policy & Procedure Framework. For clarity, Table 1 provides a definition and purpose for terms used in this policy.

Table 1 – Definitions

TERM	DEFINITION AND PURPOSE
Code	Code of Conduct (Modern Slavery)
Modern Slavery	Modern Slavery has the same meaning as in the <i>Modern Slavery Act 2018</i> (Cth). Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include: human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour. Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. These practices are also harmful and may be present in some situations of modern slavery.

Roles and Responsibilities

Roles and responsibilities related to all policies are outlined in BN's Policy & Procedure Framework and roles specific to this policy are outlined in Table 2., and describe the following:

Table 2 – Roles and Responsibilities

ROLE	DESCRIPTION
Board of Management	– Sponsoring, leading, and demonstrating compliance with the policy. – Communicating the importance of the policy to all staff. – Implementing the policy in each respective function for compliance. – Responding to the recommendations made when the policy is reviewed, to ensure the policy remains up to date and relevant to BN – Ongoing oversight and review of quarterly updates on complaint progress and outcomes.
Head of Responsible Business	– Leading the primary responsibility for the practical operation of this Procedure. – Agreeing on a resolution with all parties. – Updating the Board of Management quarterly. – Recommending improvements to BN policy and processes. – Assessing the effectiveness of this Procedure at least every three years.

Due Diligence

BN is committed to proactively addressing modern slavery risks in our operations and supply chain, in a manner that complies with all applicable laws, rules and regulations. Key features of BN's due diligence include:

1. Comprehensive policies and practices including Modern Slavery Policy, Human Rights Grievance Procedure, Supplier Code of Conduct (Modern Slavery) and Whistleblower Policy.
2. Supply chain mapping using a comprehensive risk identification intelligence platform for direct and indirect suppliers (Tiers 1 to 10); supplier obligations, questionnaires, monitoring, audits and expectations of modern slavery due diligence and prevention.
3. Modern slavery training on risk identification, prevention and reporting for key areas of our business including Chief Executive Officer, Executive Leadership Team and staff involved in operational and supply chain decisions.

Commitments

BN is committed to a business in which:

1. All applicable wage laws, including those relating to minimum wages, overtime hours, legally mandated benefits and minimum legal working age are complied with.
2. Staff are provided with clear written explanations of all key information about their pay structure and pay periods in a language that the staff member can understand.
3. Staff are free to terminate their employment in accordance with their employment agreement.
4. Staff hours should not exceed applicable laws relating to maximum permissible work periods.
5. Staff have rights to freedom of association and collective bargaining, and have the right to form and join trade unions, in accordance with local laws. Staff are also entirely free to choose to refrain from engaging in any such activities.
6. Staff and prospective staff are not required to provide monetary deposits or originals of government-issued identity documents (such as passports) to be held as a condition of employment.
7. Staff and prospective staff are not required to pay any recruitment fees in connection with obtaining or attempting to obtain employment.

8. Staff under the age of 18 (if any) are not required to perform work that may jeopardise their health or safety having regard to their age, maturity, and ordinary life experience.
9. Harsh and inhumane treatment is unacceptable, including threats of these.

Supplier Obligations

BN's Supplier Code of Conduct (Modern Slavery) (**Code**) sets out the requirements for our suppliers and their employees, agents and subcontractors with whom BN enters into an agreement for the supply of goods or services (collectively Suppliers). As part of our modern slavery response, we are progressively incorporating the Code into new and existing Supplier relationships, including encouraging adoption of the Code or through binding provisions in Supplier contracts.

Reporting Concerns

Staff and affected stakeholders should report any concerns relating to potential modern slavery practices or other workplace related human rights issues through our Human Rights Grievance Procedure, or alternatively, our Whistleblower Policy. If we identify any adverse impacts on human rights and/or working conditions arising from our operations or those of our Suppliers, we are committed to providing the appropriate remedial action as quickly as possible.

We encourage collaboration with our Suppliers to improve collective and collaborative responses to modern slavery risk. While collaboration and addressing any risks is our preferred approach, we also reserve the right to terminate any supply contract for breaches of human rights, modern slavery laws or this Code, particularly in circumstances of a serious breach or where required of us under contract with another party.

Modern Slavery Act

BN will comply with all obligations under the *Modern Slavery Act 2018* (Cth), including the requirement for lodging annual statements in a timely manner. The Board of Management will approve each modern slavery statement.

Further Information

Questions regarding the policy should be directed to:

NAME	ROLE	CONTACT
Katie Swain	Principal, Head of Pro Bono & Responsible Business	katie.swain@bnlaw.com.au

Policy Management

Related Documents

This document is read in conjunction with all other applicable documents, including, but not limited to, Policies, Standards, Guidelines, Procedures, Toolkits and Work Instructions. You may need to refer to the following specifically related documents:

Policy

DOCUMENT LINK
<u>Human Rights Grievance Procedure</u>
<u>Responsible Procurement Policy</u>

DOCUMENT LINK

[Whistleblower Policy](#)

[Supplier Code of Conduct \(Human Rights & Modern Slavery\)](#)

[Supplier Management Policy](#)

Monitoring, Review and History

This document will be reviewed by the Owner in line with the scheduled 1, 2 or 3 year review cycle, depending on the level of risk. Changes to legislation and regulation that may impact this document are monitored by the Owner and any changes are managed in line with the Policy and Procedures Framework.

VERSION	DATE	DESCRIPTION OF CHANGE	AUTHOR
1	April 2025	Creation	Katie Swain, Principal & Head of Pro Bono & Responsible Business