Modern Slavery Prevention Policy

Section 1 - Purpose

(1) This Policy sets out our commitment to preventing modern slavery and human trafficking in our operations and supply chains, and describes the measures we take to identify, assess and mitigate modern slavery risks in a manner that is proportionate, practical and appropriate to the size and nature of our organisation.

Section 2 - Our Commitment

(2) We are committed to conducting our business ethically, responsibly and in compliance with applicable modern slavery and human rights laws. We do not tolerate modern slavery, forced labour, human trafficking, debt bondage or other forms of exploitation in any part of our operations or supply arrangements.

Section 3 - Scope

(3) This Policy applies to:

a. our organisation and workforce;
b. all service providers, suppliers and contractors engaged by us;
c. recruitment agencies used to source workers; and
d. any third parties engaged in delivering services to our clients on our behalf.

Section 4 - Our Operating Model

(4) We are a compact organisation and engage directly with our service providers.

(5) This operating model enables:

a. direct engagement and oversight;
b. informed suitability decisions; and
c. proportionate risk assessment aligned to our scale.

Section 5 - Provider Selection and Suitability Assessment

Direct Assessment

(6) All providers are assessed individually prior to engagement and periodically thereafter. Assessments are informed by:

a. nature of the services provided;
b. workforce model;
c. operating location and jurisdiction; and
d. client base and regulatory environment.

Location and Legal Framework

(7) In assessing provider suitability, we consider:

a. where the provider operates; and
b. whether the provider is subject to the same or equivalent modern slavery and employment laws as us or our clients.

(8) We favour local and national providers operating within consistent legal frameworks, as this:

a. enhances transparency and accountability;
b. supports legal consistency; and
c. reduces exposure to jurisdictions recognised as higher risk for modern slavery.

Government and Regulated Client Considerations

(9) Where providers service government agencies or other regulated entities, we recognise that such providers are typically subject to heightened compliance, governance and reporting obligations. This is taken into account as part of our assessment of provider maturity and suitability.

Section 6 - Workforce and Recruitment Practices

Workforce Composition

(10) We maintain a balanced and appropriate mix of employees and contractors, aligned to operational needs.

(11) We recognise that workforce composition can influence modern slavery risk and take this into account when assessing providers and recruitment practices.

Recruitment Agencies

(12) Where recruitment agencies are used, we:

a. prefer reputable, locally established agencies;
b. engage agencies operating under domestic employment and labour laws; and
c. seek assurance that recruitment practices are lawful, ethical and transparent.

(13) This approach reduces exposure to high-risk recruitment practices and supports traceability and oversight of worker engagement.

Section 7 - Risk Management Approach

(14) We apply a risk-based approach to modern slavery, focusing our efforts where risk is more likely to arise. This includes consideration of:

a. jurisdictional risk;
b. industry risk;
c. workforce model; and
d. use of recruitment or labour hire arrangements.

(15) Our approach recognises that modern slavery risk cannot be eliminated entirely but must be identified, assessed and managed appropriately.

Section 8 - Monitoring and Review

(16) Modern slavery risks are not static. We therefore:

a. review provider arrangements where circumstances change;
b. reassess risks if operating models, locations or workforce arrangements change; and
c. respond to credible concerns or allegations if they arise.

Section 9 - Reporting and Concerns

(17) Any concerns or suspected instances of modern slavery relating to our operations or providers may be raised through our usual governance or reporting channels.

(18) Concerns will be taken seriously and addressed appropriately.

Section 10 - Responsibility and Oversight

(19) Responsibility for this Policy and its implementation rests with senior management.

(20) This Policy is reviewed periodically to ensure it remains appropriate to our operations, client expectations and regulatory requirements.

Section 11 - Continuous Improvement

(21) We are committed to continuous improvement in identifying and managing modern slavery risks and will update our practices as our organisation, provider base or regulatory environment evolves.

Status and Details

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Responsible Manager	Joanne Auld Director
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