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MODERN SLAVERY POLICY AND PROCEDURE

POLICY

Equal Bytes is committed to providing a safe work environment that aims for equality of opportunity for all and where the dignity of every individual is respected.

Equal Bytes conducts business in a responsible manner and with integrity and considers all ways that we may adversely or favourably impact human rights through our operations and supply chains. We are aware of our obligations under the Modern Slavery Act 2018, which aims to combat modern slavery in global supply chains.

Equal Bytes understands businesses have a responsibility to respect human rights in their operations and supply chains. This responsibility includes taking action to prevent, mitigate and where appropriate, remedy modern slavery in operations and supply chains.

Equal Bytes supports decent work, where:

- Workers are free to refuse or cease work.
- Workers are paid fairly (at least minimum wages).
- Workplaces are safe.

DEFINITIONS

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

Modern Slavery is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. These practices are also illegal and harmful and may escalate into modern slavery if not addressed.

The Modern Slavery Act defines modern slavery as including eight types of serious exploitation:

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to help companies thrive
in a rapidly changing world*

- Slavery.
- Trafficking in persons.
- Servitude.
- Forced marriage.
- Forced labour.
- Debt bondage.
- Deceptive recruiting for labour or services.
- Worst forms of child labour, where children are subjected to slavery or similar practices, or engaged in hazardous work.

The Modern Slavery Act 2018 calls upon large organisations to report on the risk of modern slavery in their supply chains and operations and to state their strategy to mitigate the risk through a mechanism of continuous improvement, transparency and reporting.

The Australian Government considers that there is a high risk of Australian businesses being exposed to modern slavery risks on the basis that, traditionally, Australia has had a strong presence in 'high risk' sectors and industries (for example, agriculture, construction, electronics, extractives, fashion and hospitality), and many Australian businesses have supply chains that extend throughout the Asia-Pacific which is often identified by international labour organisations as being a 'high risk' region.

PROCEDURE

Equal Bytes does not have an annual consolidated revenue large enough to meet the mandatory reporting requirements of the Modern Slavery Act (over AU \$100 million), however we are strongly opposed to any sort of modern slavery and it is an important consideration in any procurement or consulting activities.

It is possible to choose to voluntarily report:

- Any Australian entity or foreign entity carrying on a business in Australia can provide a
- voluntary Modern Slavery Statement.
- If you wish to provide a voluntary statement you must formally notify the Australian
- Border Force.
- Voluntary statements must comply with all of the requirements for statements in the
- Commonwealth Modern Slavery Act 2018, including the mandatory criteria for content.
- Providing a voluntary statement may benefit your entity, including helping you to
- attract customers, respond to questions from business partners, access new business
- opportunities, gain a competitive advantage and build your reputation.

- Voluntary reporting can also be a significant commitment that should be carefully considered beforehand.
- Once committed to providing a voluntary statement failure to report will be treated
- the same way as other reporting entities that do not comply.

Statements are kept by the Minister in the Modern Slavery Statements Register, which may be accessed by the public, free of charge.

It is important to have vigilance to identify where the risk of modern slavery might be in the products we buy to run our business or in businesses we provide consulting services to.

Please note that this procedure is a work in progress and future intentions are to introduce initiatives such as a supplier code of conduct, modern slavery clauses in supplier contracts and gap analysis to identify where the risk of modern slavery might be.

RELATED POLICIES AND PROCEDURES

- Code of Conduct Policy and Procedure
- Duty of Care Policy
- Incident Reporting Procedure

RELATED LEGISLATION AND REFERENCES

- Modern Slavery Act 2018

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