



# Modern Slavery and Ethical Sourcing Policy

## GRAYS GROUP

Date Approved: 26 November 2020

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# Modern Slavery and Ethical Sourcing Policy

## Grays Group

### 1. Introduction

#### 1.1 Background

The Grays Group is committed to the respect and protection of human rights through the eradication of modern slavery. Modern slavery encompasses situations where the freedom and rights of victims are exploited by the use of coercion, threats or deception and can include, human trafficking, slavery, servitude, forced marriage, debt bondage and child labour.

The Grays Group recognises that modern slavery is a complex, global problem that requires a collaborative commitment to eradicate and we are committed to working with our business stakeholders to achieve this.

The Grays Group is committed to the highest standards of conduct, transparency and ethical behaviour in all of its business activities.

Under the *Australian Modern Slavery Act 2018* (Cth) which came into effect on 1<sup>st</sup> January 2019 we are required to make annual reports on the business strategies we have in place to mitigate risks of modern slavery in our operation and associated supply chains.

#### 1.2 Purpose

The purpose of this Policy is to ensure the Grays Group:

- (a) operates in accordance with local, national and any other applicable laws

and regulations;

- (b) sources product and services ethically and works collaboratively with suppliers to achieve improvement in social and environmental business practices;
- (c) implements appropriate actions to prevent, reduce and wherever possible eradicate any modern slavery in our operations or supply chain; and
- (d) meets the legal and regulatory obligations under the *Modern Slavery Act 2018* (Cth).

#### 1.3 Definitions

Capitalised terms used in this Policy are defined in the Schedule.

### 2. Scope

This Policy applies to all directors, Employees and agents of the Grays Group. It should be read in conjunction with the Grays Group Code of Conduct, Fraud and Corruption Prevention and Whistleblowers Policies.

### 3. Policy

#### 3.1 Conduct of the Business

Each business unit/division of the Grays Group must:

- (a) establish and adopt policies and procedures to ensure ethical sourcing and adequately address the risks of modern slavery;
- (b) ensure that all supplier contracts entered into from the date of this Policy or that are subject to renewal/extension from the date of this Policy:
  - a. include specific terms relating to compliance with Australian modern slavery laws and any foreign modern slavery laws that may be applicable in the location in which they operate;
  - b. meet the Minimum Requirements as defined in Schedule 1 of this policy;

and

- c. provide termination rights if the supplier is unable or unwilling to meet the Minimum Requirements;
- (c) use risk assessment to consider factors such as product type and country of origin, in order to monitor suppliers for compliance with the Minimum Requirements;
- (d) provide accountability for management of any risks and/or issues of modern slavery in the division/business unit;
- (e) demonstrate due diligence in the onboarding process of any new supplier to determine their risk level in relation to modern slavery and ethical sourcing;
- (f) ensure that appropriate training in the procedures regarding ethical sourcing and modern slavery as defined in this policy and implemented by the division/business unit, is provided to any relevant roles within the division or business unit;
- (g) work collaboratively with suppliers to address any breach of this policy; and
- (h) monitor and perform an annual audit of the effectiveness of the risk management processes outlined above.

## **4. Reporting Concerns of Modern Slavery**

### **4.1 Reporting unethical or unlawful conduct**

It is imperative that all Employees and Grays Group's suppliers feel free and safe to come forward when they have reasonable grounds to suspect that there is evidence of unethical behaviours or a breach of laws and obligations relating to modern slavery or ethical sourcing.

Reports can be made by:

- (a) Utilisation of the Whistleblowers Policy [Whistleblowers Policy](#)
- (b) Contacting the Australian Federal Police who are responsible for investigating suspected cases of modern slavery. To discuss or report a suspected case they can be contacted 131 237.
- (c) If someone is in immediate danger or it is an emergency, if you are in Australia, please call Triple Zero (000) for police assistance.

### **4.2 Timely review of reported conduct**

All reports of Reportable Conduct submitted under the Whistleblower Policy will be investigated by a Whistleblower Protection Officer on a timely basis. Appropriate corrective action will be taken as warranted by the investigation.

## **5. Other matters**

### **5.1 Distribution of Policy**

This Policy is available to current Employees of the Grays Group through the Grays Group's intranet and it will be made available at certain staff briefing sessions and/or smaller team meetings. It will also be available on Grays internet site and provided to suppliers upon request.

### **6.2 Amendment of Policy**

This Policy can only be amended with the approval of the Board.

### **6.3 Adoption of Policy and Board review**

This Policy was adopted by the Board on the date specified in the table in paragraph 7 and takes effect from that date.

The Board will review this Policy periodically. The General Counsel will communicate any amendments as appropriate.

## **7. Document control**

Version	Management Approval
1.0	Grays Group Board of Directors – 26 November 2020

## Schedule 1 Minimum Requirements

<b>No Child Labour</b>	<ul style="list-style-type: none"><li>(a) Suppliers will comply with all applicable local laws in regard to minimum legal working age in the country in question. If not legislated, then Convention 138 of the International Labour Organisation (ILO) shall apply.</li><li>(b) Suppliers must verify and document the age of all employees.</li></ul>
<b>No bonded or forced labour</b>	<p>Suppliers must:</p> <ul style="list-style-type: none"><li>(a) Not use any kind of forced labour (any work demanded under threat of penalty or not freely agreed to by the worker).</li><li>(b) Not use any bonded labour (any work with little or no pay received by the worker, but in repayment of a debt owed by themselves or another person).</li></ul>
<b>Working conditions, wages and record keeping</b>	<ul style="list-style-type: none"><li>(a) Wages, overtime and benefits must be compliant with all applicable local laws.</li><li>(b) Prior to commencement of employment, workers must be provided with clear written information relating to their conditions of employment, wages and benefits.</li><li>(c) Record keeping must be accurate and transparent.</li><li>(d) Working environment should be safe for workers to perform their duties.</li></ul>
<b>Hours of Work</b>	<ul style="list-style-type: none"><li>(a) Working hours must be compliant with local law and must not exceed the maximum working hours mandated by those laws.</li><li>(b) If working hours are not legislated, then the applicable ILO convention should be applied.</li><li>(c) Overtime will be agreed not mandated and must:<ul style="list-style-type: none"><li>i. not be excessive in hours or regularity; and</li><li>ii. compensated in compliance with applicable local laws.</li></ul></li></ul>
<b>Discrimination</b>	<p>Employment should be based on individual ability and suitability for the role. Conditions of employment must not be based on gender, race, religious or personal beliefs, sexual orientation, age, disability, marital status or political views.</p>

## Schedule 2 Definitions

For the purposes of this Policy:

**Child Labour** means work that is mentally, physically, socially or morally dangerous, harmful to children and/or interferes with their schooling by depriving them of the opportunity to attend, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work.

**Employee** includes any director, secretary, officer, employee (current or former employees who are permanent, part-time, fixed-term or temporary), volunteer, secondee or contractor (or employee).

**Grays Group** means Grays.com Pty Ltd ABN 78 634 636 310 and each of its Related Bodies Corporate (as defined in the *Corporations Act 2001* (Cth)).

**International Labour Organisation (ILO)** means the tripartite U.N. agency, consisting of 187 member States, who set labour standards, develop policies and devise programmes promoting decent work for all women and men.

**ILO Convention 138** means the Minimum Age Convention, 1973 as set out on the ILO website.

**Modern Slavery Act** means the *Modern Slavery Act 2018* (Cth).

**Reportable Conduct** has the same meaning given to that term in the Grays Group Whistleblower Policy.

**Whistleblower** means an Employee or Eligible Discloser (as defined in the Whistleblower Policy) who alerts the Grays Group and/or a regulatory authority to Reportable Conduct within the Grays Group.

**Whistleblower Policy** means Grays Group's current Whistleblower Policy available on the Grays Group's internet page.