



MODERN SLAVERY

CORPORATE POLICY

SlumberCorp Pty Ltd

December 2023

1. INTRODUCTION

Modern Slavery is a morally reprehensible crime that robs people of their liberty and dignity for someone else's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At SlumberCorp Pty Ltd (SlumberCorp), we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operations and supply chain. We are taking concrete steps to tackle modern slavery, as outlined in this Modern Slavery Policy (the Policy).

2. COVERAGE

This policy applies to all employees, contractors, consultants, and suppliers of SlumberCorp. In this Modern Slavery Policy, references to the Company includes references to the Company and all its subsidiaries.

3. PURPOSE

We are committed to ending all forms of modern slavery and outline our approach to reducing the risk of slavery practices in our supply chains and operations in this Policy. It is consistent with our ethical framework, that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations.

This Policy also supports the intent of international conventions, treaties and protocols relevant to combatting modern slavery and the Australian Modern Slavery Act 2018¹.

4. DEFINITIONS

For the purposes of this policy, modern slavery is defined as eight types of exploitation as defined by the Australian Modern Slavery Act 2018:

1. **trafficking in persons**, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
2. **slavery**, which is where the offender exercises powers of ownership over the victim;
3. **servitude** which is where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work;
4. **forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work;

¹ Modern Slavery Act (Cth) 2018. Available from www.legislation.gov.au/Details/C2018A00153

-
5. **forced marriage**, which is 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;
 6. **debt bondage**, which is 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;
 7. **the worst forms of child labour**, which involves situations where children are exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs;
 8. **deceptive recruiting for labour or services** which is where the victim is deceived about whether they will be exploited through a type of modern slavery.

It can also extend to:

- entering into a commercial transaction involving a slave;
- exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading;
- conducting business involving servitude or forced labour (including exercising control over the business or providing finance to it).

Indicators of modern slavery include:

- Individuals not being paid for the work they undertake;
- Individuals being held in debt-bondage (being told they "still" owe money after having paid off a previous debt);
- An individual's passport being held by their "employer" in order to keep the individual at work;
- Multiple benefit claimants having their benefits being paid into the same account;
- An individual not having freedom of movement (i.e. Passport being taken);
- Clear exploitation of an individual by another for financial or sexual gain.

Suppliers is defined as any organisation or person who provides us with goods or services, including their subcontractors, agents, related entities, and consultants.

Supply chains is defined as the products and services (including labour) that contribute to our own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

5. COMMITMENT

No slavery, servitude, forced or compulsory labour, abuse of power over vulnerable individuals, human trafficking, or any other form of exploitation is tolerated within our organisation or supply chain. We welcome transparency and this Policy sets out for the public, our stakeholders, suppliers, and employees the approach we are taking in this regard.

6. APPROACH

We will work proactively to reduce modern slavery within our supply chains and operations and expect all organisations we engage with to do the same.

Recruitment

We conduct appropriate checks on prospective employees in accordance with applicable laws at recruitment, and our HR team works closely with the local teams to make sure that pay and conditions are managed effectively.

Operations

We maintain a Modern Slavery Policy (this Policy) outlining our approach to reducing the risk of modern slavery practices within our supply chains and operations. The Policy explains the steps we take to work with suppliers to reduce risks, as well as the support available when we are informed that someone may be at risk of or affected by modern slavery practices.

When existing policies undergo policy review or new policies are under development, policy owners are required to identify existing modern slavery commitments that can be enhanced, or where modern slavery protections can be incorporated.

Risk assessment

We conduct an annual risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

Suppliers

Suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event Suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Our suppliers must inform us as soon as possible if they identify any occurrence of or material risk of modern slavery and notify the relevant authorities where necessary.

Supplier due diligence

We conduct due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals.

This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to demonstrate that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

Supply Chain

In accordance with our commitment to acting ethically and with integrity in all our business relationships, we implement effective systems and controls to ensure Modern Slavery is not taking place in our supply chains. We will achieve this by ensuring effective communication and reinforcement of relevant policies, which provide a clear view of the values and principles that underpin all our work, and which we expect employees and suppliers to adhere to.

We procure goods and services needed for our business's day-to-day operations from preferred and approved suppliers operating in Australia and also overseas.

Other than raw materials required to operate our business, we also identify key supply chains such as Manufacturing equipment, transportation, logistics, site services and Technology.

Training and development

Our employees will receive training and development opportunities to better understand the causes, humanitarian impacts, Modern Slavery Policy, and our approach to reducing the risk of slavery within our supply chains and operations.

People with high purchasing responsibilities are provided additional training. People who initiate and/or periodically review relationships with third parties are provided with training to apply the relevant due diligence processes.

Future Developments

We aim to continue to revise and develop our approach to modern slavery compliance to build capacity within our business to monitor and act on modern slavery risks.

- Publication of our Modern Slavery Policy.
- Update of our tender documents to include a Modern Slavery Supplier Questionnaire
- Review of our procurement policy and procedures to ensure inclusion of the Modern slavery clauses.
- Update of our standard procurement agreements to include modern slavery clauses.

7. RESPONDING TO CONCERNS

Reporting unethical or unlawful conduct

A key part in promoting ethical standards is empowering our people, including our customers, suppliers, and partners, to speak up when they have reasonable grounds to suspect our company, or our people are not acting ethically and according to the law. Concerns about compliance or ethical issues or illegal or unethical activities are to be reported in accordance with our Whistleblower Policy, which is available as part of the Corporate Governance Plan, on the Company's website.

Responding to concerns of modern slavery practices

The often-hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. It is important to respond in a way that is safe, ethical and respects the dignity and rights of the person at risk or affected by modern slavery practices.

There are a range of supports available for when a person becomes aware that someone is at risk of or affected by modern slavery practices, regardless of if this occurs within our supply chains and operations or in the broader community.

Our HR Manager, can be contacted for further information, advice and options available when a person is at risk of affected by modern slavery practices.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 237 to discuss or report a suspected case. Contact can be made anonymously.

In an emergency and if someone is in immediate danger, please call triple zero (000) for police assistance.