

MODERN SLAVERY WHISTLE BLOWER POLICY

PURPOSE

Mainbrace acknowledges the propensity for modern slavery practices as defined in the Modern Slavery Act 2018 (Cth) to potentially occur in our operations and extended supply chains. We understand and accept our continuing obligation to assess and address these risks.

POLICY

The objectives of this policy are to:

- Describe the modern slavery practices as defined in the Modern Slavery Act 2018 (Cth); and
- Encourage potential whistle blowers to disclose suspect findings of modern slavery practices, safely and securely and with confidence that they will be protected from repercussions or victimisation.

MODERN SLAVERY PRACTICES

1. Trafficking in Persons;

The movement of a person into, out of, or within Australia through the use of coercion, threats or deception for certain exploitive end purposes. These exploitive end purposes are slavery, servitude, forced labour, forced marriage and debt bondage

2. Slavery;

Occurs when a person exercises the rights of ownership over another person. This includes the power to make the victim an object of purchase or to use their labour or services in a substantially unrestricted manner

3. Servitude;

When the victim does not consider themselves free to cease providing their labour or services OR to leave their place or area of work because of the use of coercion, threats or deception. To be in a condition of servitude, the victim must also be significantly deprived of their personal freedom.

4. Forced Marriage;

Occurs when the victim gets married without freely and fully consenting because they have been coerced, threatened or deceived or because they are incapable of understanding the nature and effect of a marriage ceremony.

5. Forced Labour;

Occurs when the victim does not consider themselves free to cease providing their labour or services OR to leave their place or area of work because of the use of coercion, threats or deception.

6. Debt Bondage;

Occurs when the victim pledges their services or the services of a third person as security for a real or purported debt where this debt is manifestly excessive; or the reasonable value of their services is applied to the debt; or the length and nature of their services are not limited or defined.

7. Deceptive recruiting for labour services

Situations where the victim is deceived about the types of services or labour they are being engaged for.

8. The worst forms of child labour.

Child labour, in accordance with the definition used by the International Labour Organisation, is work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development. It refers to work that:

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

PROCEDURE

This Policy applies to all employees, including their relatives, dependents or spouse.

It also applies to consultants, subcontractors and suppliers of Mainbrace including their employees.

Suspected findings of modern slavery practices can be reported by each and any of the following methods:

- Mainbrace People and Culture – where Mainbrace employees feel comfortable raising concerns directly and in confidence;
- Mainbrace Senior Management – concerns can be raised by any whistle blower with a member of senior management who will escalate the issue as appropriate;
- External body – you can raise concerns directly with the relevant external regulatory body where you feel that none of the above options will sufficiently address your concerns:

Emergency

In emergencies where there is immediate danger, or where the situation involves a child.

Call Triple Zero (000)

Australian Federal Police

For victims of trafficking

Call 131 AFP (131 237)

Or report through the AFP website www.afp.com.au

Anti-Slavery Australia

For free and confidential legal advice for you or the person you are trying to assist.

Call (02) 9514 8115

or visit www.antislavery.org.au

Fair Work Ombudsman

If you have a workplace concern or subjected to unlawful workplace conditions

For general information visit www.fairwork.gov.au

Whistle blowers will be entitled to identity protection (confidentiality), protection from detrimental acts or omissions in the workplace and civil, criminal and administrative liability in relation to their disclosures.

All matters in the disclosure will be thoroughly investigated in an objective, independent, fair and confidential manner as soon as practical after the disclosure has been reported. Mainbrace will keep the whistle blower and the subject of the disclosure informed of the outcome of the investigation.

A whistle blower does not need to be certain that the information provided is accurate but must have reasonable grounds to make the disclosure in the first instance. Should a disclosure be found to be without reasonable grounds or found to be false or malicious Mainbrace at its sole discretion may take disciplinary action where available up to and including termination of the whistle blowers employment or contract.

AVAILABILITY OF POLICY

This policy will be made available to potential whistle blowers via Mainbrace's website and for Mainbrace employees via Mainbrace's "MILA" intranet system.

All persons affected by this policy will be updated if there is any future amendment to this policy.