

# Modern Slavery Policy

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## RELATED DOCUMENTS

<b>Document Title</b>	<b>Link</b>
Supplier Management Procedure	

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## PURPOSE

Modern slavery is an ongoing issue worldwide.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:

- Slavery, servitude (coercing someone to provide services) and forced or compulsory labour;
- Human trafficking (arranging or facilitating the travel or movement of a victim with a view to having them be exploited);
- Committing any offence with the intention to commit human trafficking; or
- Aiding, abetting, counselling or procuring any of the above offences.

All of these practices deprive individuals of their liberty in order to exploit them for personal or commercial gain. Our company values instil in us the obligation to conduct our business with integrity.

As part of Active Utilities commitment to limiting the risk of modern slavery, Active Utilities will comply with all applicable Australian and International slavery legislation, including the *Modern Slavery Act 2018* (Cth) and any state-based legislation that may be applicable.

This policy will be used to underpin any statement on modern slavery that is required to be made under that applicable legislation.

## SCOPE

This policy applies to all persons working for and on behalf of Active Utilities in any capacity including employees, directors, officers, agency workers, contractors, consultant and any other third party representative.

It also applies to all persons and entities who have, or seek to have, a business relationship with Active Utilities. Active Utilities expects all who have, or seek to have a business relationship and/or who participate in Active Utilities supply chain, to familiarise themselves with this policy and to act in a way that is consistent with its values.

## POLICY STATEMENT

Active Utilities is committed to acting ethically and with integrity in all business dealings and relationships.

Active Utilities has a zero-tolerance approach to all forms of modern slavery within its business and supply chains.

Should Active Utilities become aware that any supplier does not meet the Modern Slavery Code of Conduct, we will engage directly with the supplier and develop an action plan to eradicate the practise in a transparent, timely and efficient manner. Should the supplier be uncooperative, the appropriate action will be taken, including terminating the business relationship, if necessary, by Active Utilities.

## **Our Supplier Management Procedure**

Active Utilities has a Supplier Management Procedure which includes a Modern Slavery Supplier Code of Conduct. Active Utilities will work collaboratively with those in our supply chain to identify and eradicate any instances of modern slavery.

## **Reporting**

Active Utilities is committed to ensuring adherence to this policy as part of its goal in preventing, detecting and reporting modern slavery in any part of supply chain. We encourage all those working on the Company's behalf to avoid any activity that might lead to, or suggest, a breach of this policy.

Any suspected instances of modern slavery should be reported. Staff may report to their one-up manager, HR Manager, the Management team, or the Executive team. Complaints will be kept confidential and will be dealt with appropriately.

## **Breaches of this Policy**

Active Utilities considers a breach of this policy to be a very serious matter. Any employee who breaches this policy by engaging in or conspiring to engage in any modern slavery conduct will face disciplinary action, up to and including termination of employment.

Active Utilities may terminate its relationship with any employee, individual or organisations working on its behalf, or engaged by it within its supply chain, if they breach this policy.

## **Reporting on our progress**

Each year, Active Utilities will provide a Modern Slavery statement (as required under Australian law) that describes the actions we have taken to address Modern Slavery risks.

The annual Modern Slavery statement will be published on the company intranet site.