

MODERN SLAVERY POLICY

Purpose

The purpose of this policy is to confirm ANZGOG's position regarding fair work practices, and to confirm our zero tolerance for 'modern slavery practices.'

Key Principles

- (a) ANZGOG will comply with all legislative requirements imposed upon them in relation to work practice including compliance with the Fair Work Act 2009
- (b) While ANZGOG is not compelled to comply with Modern Slavery legislation in Australia, ANZGOG is aligned with that legislation, and as a matter of ethics and principle supports and endorses all steps taken to eliminate improper work practices.
- (c) ANZGOG does not accept or practice any form of slavery within the business internally or with external stakeholders.

MODERN SLAVERY

- (a) ANZGOG has a zero-tolerance approach to modern slavery within its operations and supply chains.
- (b) ANZGOG expects all staff to be aware of and recognise the importance of human rights and the negative impact of modern slavery abuses.
- (c) Modern slavery is only used to describe serious exploitation. Modern slavery has a broad scope and includes trafficking in persons; slavery; servitude; forced marriage;
 - forced labour; debt bondage; deceptive recruiting for labour or services;
 - and the worst forms of child labour.
- (d) Modern slavery includes conduct which would constitute:
 - (i) an offence under Division 270 or 271 of the Criminal Code; or
 - (ii) an offence under either of those Divisions if the conduct took place in Australia; or
 - (iii) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
 - (iv) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).
- (e) ANZGOG will comply with all local laws and legislation in relation to the employment of personnel that apply to ANZGOG, including the Fair Work Act 2009 (Cth)

(f) ANZGOG recognises and is influenced by the following laws and guidelines:

- Modern Slavery Act 2018 (Cth);
- Modern Slavery Act 2018 (NSW);
- Australian Criminal Code Act 1995 (Cth), specifically, Division 270 or 271 of the Criminal Code, extending to conduct in and outside of Australia;
- Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework;
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; and
- ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

Reporting

All staff have a responsibility to detect and report any concerns they may have in relation to modern slavery within ANZGOG’s operations and supply chains. Staff are ANZGOG’s first line of defence.

Such concerns are to be reported to the CEO. ANZGOG has a Whistleblower Policy which provides protections modern slavery related reporting, please refer to the Whistleblower Policy for further details. All reports of concerns relating to modern slavery will be treated with sensitivity, confidentiality and will be taken very seriously. Queries relating to this Policy may be directed to the CEO.

Breach of this policy

Any staff member who breaches this Policy by engaging in or conspiring to engage in any modern slavery conduct may face disciplinary action. ANZGOG may terminate relationships with individuals or organisations working on our behalf if they breach this Policy. Referral to proper authorities will be taken in cases involving breaches of the criminal law.

Review

At least once a year this policy will be reviewed by the CEO and ARC. Any substantive changes to the policy will be recommended to the Board of Directors to be ratified.

Version Control Table

Title	Modern Slavery Policy			
Created By	Rachael Sutton of Mills Oakley			
Date Created	29 April 2022			
Maintained By	CEO and Governance Coordinator			
Version Number	Modified By	Modifications Made	Date Modified	Status
1.0	ANZGOG Board	Ratified.	19/05/2022	FINAL
1.1	Tal William (Holman Webb)	Revision of policy to meet current compliance.	02/11/2023	Under Review
1.2	ARC	ARC recommendation for Board to accept.	14/11/2023	Under Review
2.0	ANZGOG Board	Ratified.	23/11/2023	FINAL