

PURPOSE

The purpose of this policy is to reflect HT Services commitment to addressing modern slavery and to demonstrate our proactive approach in protecting workers from exploitation. The objectives and information outlined in this policy are based on a culture of high ethical standards, a strong understanding and strict adherence to applicable laws and compliance with the *Modern Slavery Act 2018 (Cth)*.

Modern Slavery is defined as any type of behaviour which may lead to exploitation, including:

1. **Trafficking in persons:** 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:** when a person exercises powers of ownership over another.
3. **Servitude:** situations 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 marriage:** situations 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.
5. **Forced labour:** situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.
6. **Debt bondage:** situations 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. **Worst forms of child labour:** situations where children are subjected to slavery or similar practices, including for sexual exploitation, or engaged in hazardous work which may harm their health, safety or morals, or used to produce or traffic drugs.

SCOPE

This policy applies to all persons working for the company in any capacity. This includes employees, managers, directors, volunteers and any person representing HT Services.

POLICY STATEMENTS

HT Services has a zero-tolerance approach to Modern Slavery. The company is committed to examining and evaluating business systems and controls to ensure stringent methods are in place to identify, mitigate and respond to any potential risk of Modern Slavery occurring.

The Company recognises and adheres to the Modern Slavery Act 2018 (Cth) and will take meaningful action to ensure its conduct is aligned to the Act and will take immediate steps to address any breaches of this Act within the business.

HT Services explicitly prohibits:

- All forms of Modern Slavery
- Using recruiters that do not comply with Australian labour laws
- Engaging in or supporting the use of forced or compulsory labour
- Withholding identity documentation, wages or allowances, or behaving in a way which may lead an employee to believe these may be withheld

HT Services will ensure that:

- All Employees will be treated with dignity and shall not be subjected to suffer any harassment, physical or mental punishment or other forms of abuse.

- Any process which involves a worker under the age of 18 years will include the child's parent or legal guardian and will comply with all employment law requirements pertaining to the employment of child workers.
- Effective employee engagement is promoted by encouraging and facilitating open sincere feedback from employees on all matters of the company's business interest.
- A readily accessible grievance policy is available which is transparent, equitable and predictable to enable the remediation of any abuse of human rights and its impacts that may arise in its operations.
- That employees are aware that they are free to leave at any time subject to standard notice periods in accordance with their individual contracts of employment.
- Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker within 28 days of notification. Such repayments include but are not limited to:
 - Any cost to the employee as a result of obtaining a National Police Clearance specifically for the purpose of their employment with HT Services.

Failure to adhere to this policy by any employee may result in disciplinary action, up to and including dismissal.

RAISING AWARENESS

HT Services is committed to raising awareness and promoting understanding of the risks of Modern Slavery by providing compulsory training to all workers representing the company. Online modules are completed through the Supply Chain Sustainability School, with further training compulsory for those workers acting in a supervisory or managerial role.

In the instance where HT Services recognises or is alerted to risks that fall outside of its direct control or responsibility, the company shall engage with key stakeholders to encourage positive change and understanding within the industry.

REVIEW

This policy is approved by the Board of Directors and is reviewed annually to ensure its relevance and effectiveness.

This policy may be reviewed earlier where a change in legislation occurs or any other requirement to which the Company subscribes is identified as needing review to ensure the adequacy, suitability and continuing effectiveness of the policy.

AUTHORISATION

For any questions or concerns related to this policy, please contact the authorised person listed below.

This policy is authorised by:

A handwritten signature in black ink, appearing to read 'Aaron Hawke', written in a cursive style.

Aaron Hawke
MANAGING DIRECTOR