

Modern Slavery Policy

1. What is the purpose of the policy?

To eliminate or limit any potential risk of modern slavery practices in Mounties Group business.

This policy supports the commitment to the group's modern slavery statement. website : (www.mountiesgroup.com.au).

2. Who this policy applies to?

This policy applies to anyone involved in our business, including employee, directors, labour hire staff, contractors, or other representative of our businesses or of any business in our supply chain.

3. What is Modern Slavery?

Modern slavery is depriving a person of freedom for commercial gain and in violation of fundamental human rights.

It describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Modern slavery involves serious exploitation, not sub-standard working conditions or the underpayment of workers although this may be unlawful for other reasons.

Modern slavery can take many forms including:

- (a) Slavery – owning a person, trading in slaves or financing slave trading (ie, human trafficking)
- (b) Forced Labour – forcing a person to work by coercion or threats (and servitude is when that person's freedom is significantly restricted)
- (c) Forced Marriage – a marriage without consent – e.g. due to lack of understanding or duress/coercion
- (d) Debt bondage – a person works to pay off a large debt, for an unlimited time or where the value of the work is not applied to the debt

- (e) Deceptive recruiting – a recruiter charges a fee for the job offer, confiscates identity documents, deceives a person about personal freedom or their ability to leave the job
- (f) Child labour – not always unlawful but not tolerated by us when it involves exploiting children, depriving them of education, making them work in unsafe working environments

Modern slavery can be complex and multi-faceted and can be difficult to spot.

4. What are indicators of modern slavery practices?

Modern slavery indicators may include where a person:

- (a) Is not in possession of their own passport, ID or travel documents;
- (b) Is acting as though they are being instructed or coached by someone else;
- (c) Allows others to speak for them when spoken to directly.
- (d) Is dropped off and collected from work.
- (e) Is withdrawn or appears frightened or have physical indicators of slavery, such as injuries.
- (f) Unable to contact friends or family freely.
- (g) Has limited social interaction or contact with people outside their immediate environment.
- (h) Story contains obvious errors.
- (i) Acts with hostility or have difficulty in concentrating due to trauma.
- (j) Has few possessions.
- (k) Has little or no control over their finances or no access to a bank account, or they are being significantly overcharged for their accommodation; and
- (l) Is living in a very poorly maintained and overcrowded place.

These indicators are not exhaustive and do not necessarily mean there are modern slavery practices.

5. Why do we want to limit risks of modern slavery practices?

Limiting modern slavery practices makes good business sense, protecting the workers and company reputation.

It also supports in addressing modern slavery risks that are required by modern slavery legislation.

6. What are Mounties Group's responsibilities?

The club adhere to:

A modern slavery statement as required by Australian Law and will:

- (a) Identify and address any potential modern slavery risks in the business and supply chain; and
- (b) take steps to raise awareness of modern slavery risks, including training of staff.

7. What is Employee/Directors responsibilities?

Take all reasonable steps to ensure Mounties Group business is free from modern slavery practices.

Some areas of the business are likely to have more exposure than others, including procurement and sourcing, people and culture, finance, risk, sustainability, projects, legal and leadership.

Examples of specific responsibilities include:

- (a) Participating in all training, including in this policy.
- (b) Leading by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us.
- (c) Remaining alert to indicators of slavery (see above).
- (d) Using only approved contracts which include modern slavery clauses; and
- (e) Obeying our instructions regarding modern slavery.

8. How to handle slavery concerns?

If you have reasonably held suspicion of modern slavery practices, raise your concerns with Ethics and Governance member (kamlesh.sharma@mountiesgroup.com.au), for appropriate action.

If there is immediate danger call the police – don't tackle a situation on your own as dangerous criminals can be behind modern slavery and human trafficking.

Not all victims may want to be helped and sometimes reporting a suspected trafficking case puts the potential victim at risk, so it is important that unless there is immediate danger, discuss the concerns with ethics team member first.

Keep your eyes and ears open – your awareness and actions may stop someone from being exploited or abused.

9. Who is responsible for this policy?

The board of directors are responsible for this policy and will review reports of modern slavery concerns.

This policy may be amended, or replaced, and found here:

www.mountiesgroup.com.au