

	IMS-PRC-7-1-002.01	
	TITLE:	Modern Slavery Policy
	Department:	Human Resources

POLICY STATEMENT

Prompcorp provides Facilities Management Services, incorporating a full suite of asset management, facility management (inclusive of cleaning and soft services), projects, and trades & maintenance functions across Australia and New Zealand. We are committed to providing safe, inclusive and respectful work environments.

Prompcorp is committed to upholding the highest standards of ethical conduct and human rights in its operations and supply chains. Prompcorp is also committed to limiting the risks of Modern Slavery occurring within the business, infiltrating its supply chains or through any other business relationship.

This policy complies with the **Modern Slavery Act 2018 (Australia)**, **Crimes Act 1961 (New Zealand)**, and aligns with ISO 9001:2015 (Quality), ISO 14001:2015 (Environmental), and ISO 45001:2018 (WHS) standards. It also ensures adherence to applicable legislation, regulations, and codes of practice across Australia and New Zealand.

Prompcorp's Modern Slavery policy applies to every individual involved in its business, including all employees, directors, officers, labour hire staff, contractors and external consultants or other representative of its business or any business entity. This policy outlines our commitment to preventing modern slavery and human trafficking in all aspects of our business activities.

DEFINITIONS

Modern Slavery is depriving a person of freed 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:

- Slavery- owning a person, trading in slaves or financing slave trading (human trafficking)
- Forced Labour- forcing a person to work by coercion or threats (and servitude is when that person's freedom is significantly restricted)
- 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
- Deceptive recruiting- a recruited charges a fee for the job offer, confiscates identity documents, deceived a person about personal freedom or their ability to leave the job
- Child Labour- not always unlawful but not tolerated by Prompcorp 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.

INDICATORS OF MODERN SLAVERY PRACTICES

Modern slavery indicators may include where a person:

- Is not in possession of their own passport, ID or travel/ personal documents
- Is acting as though they are being instructed or coached by someone else
- Allows others to speak for them when spoken to directly
- Is dropped off and collected from work
- Is withdrawn or appears frightened or have physical indicators of slavery, such as injuries
- Is unable to contact friends and/ or family freely
- Has limited social interaction or contact with people outside their immediate environment
- Story contains obvious errors
- Acts with hostility or have difficulty in concentrating due to trauma

- Has few possessions
- Has little or no control over their finances or no access to a bank account
- 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. Sometimes there may be other reasons or circumstances that indicate that something is not right.

PROCEDURE

Promptcorp will endeavour to:

- Prepare a modern slavery statement as required by Australian Law
- Identify and address modern slavery risks in our business and supply chain
- Take steps to raise any awareness of modern slavery risks, including by having this policy
- Promptcorp will engage directly with any new supplier in respect of the Modern Slavery policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own business.

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

Examples of specific responsibilities include:

- Participating in all training, including in this policy
- Leading by example by making appropriate checks on all employees, recruitment agencies, suppliers, contractors etc. to ensure we know who is working for us
- Remaining alert to indicators of slavery (as mentioned above)
- Conducting background checks, and asking for the appropriate documentation to be submitted
- Obeying our instructions regarding modern slavery

Turning a blind eye is unacceptable and if reasonably suspect there may be modern slavery, report it under this policy.

RESPONSIBILITIES

Management

- Management is responsible for establishing a culture of zero tolerance towards modern slavery and human trafficking within the organization.
- HR must ensure that appropriate policies, procedures, and training programs are in place to identify, prevent, and address instances of modern slavery.
- Management should provide leadership and resources to support the implementation of this policy and promote transparency and accountability throughout the organization.

Procurement and Supply Chain

- The procurement and supply chain teams are responsible for conducting due diligence on suppliers and business partners to assess their compliance with anti-slavery and human trafficking laws and standards.
- They must incorporate contractual provisions and supplier codes of conduct that prohibit modern slavery and require suppliers to uphold ethical labour practices.
- The procurement and supply chain teams should work collaboratively with suppliers to address any instances of modern slavery identified within the supply chain and support remediation efforts.

Employees

- All employees are responsible for familiarising themselves with this policy and understanding their role in preventing modern slavery within the organization and its supply chains.
- They must report any concerns or suspicions of modern slavery to management or the designated compliance officer (HR) promptly.
- Employees should participate in training and awareness programs to recognize the signs of modern slavery and understand their responsibilities in upholding ethical labour practices.

TRAINING AND AWARENESS

To support the effective implementation of this policy, Promptcorp will provide regular annual trainings and awareness sessions for all employees, contractors and suppliers as directed by HR, to educate them about modern slavery, its signs and indicators and its responsibilities in preventing it.

Training will be conducted regularly to ensure that all relevant stakeholders are equipped with the knowledge and tools to address modern slavery effectively.

LEGAL COMPLIANCE IN NEW ZEALAND

Prompcorp will ensure that this policy complies with all relevant laws in New Zealand, as well as in Australia.

REPORTING AND COMPLIANCE

Any instances of modern slavery or human trafficking identified within Prompcorp must be reported immediately to management and/or HR. Reports will be investigated promptly, and appropriate remedial action will be taken in accordance with applicable laws and regulations.

If there is an 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 a potential victim at risk, so it is important that unless there is immediate danger, you discuss your concerns first with HR before taking any further action.

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

POLICY PRINCIPLES

Zero Tolerance: Prompcorp has a zero-tolerance policy towards modern slavery and human trafficking in all its forms. We will not knowingly engage in or support any activities that involve modern slavery, forced labour, or human trafficking.

Due Diligence: We are committed to conducting due diligence on our operations and supply chains to identify and address risks of modern slavery. This includes assessing the labour practices of suppliers, subcontractors, and business partners and taking appropriate action to mitigate risks.

Transparency and Accountability: We will maintain transparency in our operations regarding efforts to prevent modern slavery. We will hold ourselves and our suppliers accountable for upholding ethical labour practices and complying with relevant laws and standards.

Continuous Improvement: We are committed to continuously improving our policies, procedures, and practices to prevent modern slavery. We will regularly review and update this policy to ensure its effectiveness and alignment with Australian and New Zealand legislative requirements and international best practices.

POLICY REVIEW

This policy will be reviewed annually to ensure its effectiveness and compliance with Australian and New Zealand legislative requirements and international standards. Updates may be made as necessary to reflect changes in laws, regulations, or best practices related to modern slavery and human trafficking.

POLICY BREACH

Any breach of this policy by an employee, contractor, or supplier is considered a serious violation of Jarrah's ethical standards.

1. Employees

- Breaches will be addressed under Jarrah's disciplinary procedures, potentially resulting in termination of employment.

2. Suppliers and Contractors

- Non-compliance may lead to termination of contracts and removal from Jarrah's supplier network.

3. Reporting Breaches

- Suspected breaches must be reported to HR or management immediately. Reports will be treated confidentially, investigated promptly, and appropriate action taken in line with legal obligations.

ENDORSED BY

Signed: **Matthew Block**

Position: CEO

Date: 31 October 2024