



SYNERTEC

Policy

Team: Corporate

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Title: **Modern Slavery**

Purpose: This policy outlines what Synertec must do to be in compliance with the Modern Slavery Act 2018 and to ensure any organisation with whom we deal with uses ethical labour practices.

Scope: This applies to all areas of Synertec's business and in our dealings with clients, contractors and suppliers.

Document Approval: Completion of the following signature blocks signifies the approver has read, understands, and agrees with the content of this document.

<i>The author is signing to confirm the technical content of this document.</i>				
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<i>This document is effective from the date of the last approval signature.</i>				

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1. Introduction

Under s 13 of the Modern Slavery Act 2018 (Act), reporting entities are required to provide the Minister for Home Affairs with a compliant Modern Slavery Statement for each reporting period under the Act. While Synertec is **not** a reporting entity as defined in the Act, many of our clients are reporting entities and required to comply with the Act.

Through this policy, Synertec seeks to raise awareness of modern slavery and how we seek to mitigate modern slavery risks in our supply chains and operations.

Synertec takes a zero-tolerance approach to any form of human rights abuses, including modern slavery, in our operations and supply chains and we expect that all our employees, suppliers, subcontractors and agents will uphold these values.

Synertec is committed to acting ethically and with integrity in all our business dealings and relationships, seeking to ensure that we are compliant with Australian and international laws and regulations in relation to modern slavery.

2. Modern Slavery

Modern slavery encompasses instances where persons use coercion, threats, or deception to exploit victims to significantly deprive them of their personal freedom, including in circumstances which endanger victims' lives or cause them serious harm¹.

Modern slavery can include human trafficking of women and children, the worst forms of child labour as defined in Article 3 of International Labour Organisation (ILO) Convention (No. 182), slavery, servitude, forced labour, debt bondage and forced marriage².

The ILO indicates that most situations of modern slavery and human trafficking are included in their definition of forced labour. Forced labour is defined in the ILO's Forced Labour Convention of 1930 as "all work which is extracted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily."

Unfortunately, Australia is not impervious to modern slavery practices particularly through employment arrangements and supply chains.

Modern slavery can happen in any industry and sector and is often linked to other crimes and illegal activities such as corruption and even environmental damage.

3. Reference Documents

Doc. No.:	Document Title:	Revision No.:
	Modern Slavery Act 2018 (Cth)	Latest
	Crimes Act 1914 (Cth)	Latest
	Criminal Code Act 1995 (Cth)	Latest
	Fair Work Act 2009 (Cth)	Latest
	Migration Act 1958 (Cth)	Latest
FRM568	Vendor Audit Questionnaire	Latest
PRC194	Purchasing Procedure	Latest

¹ *Criminal Code Act 1995 (Cth)*. Division 270 and 271

² *Criminal Code Act 1995 (Cth)*. Division 270 and 271

4. Definitions

Modern slavery	Defined in Division 270 and 271 of the <i>Criminal Code Act 1995</i> (Cth) modern slavery could include the activities below:
<ul style="list-style-type: none"> • <i>Human trafficking</i> 	<p>Human trafficking can occur in a variety of circumstances that include the organisation or facilitation of entry or proposed entry or exit of people to or from Australia for the purposes of exploitation, including in instances where the person facilitating or organising the entry or exit uses coercion, threats, or deception.</p> <p>In this instance, exploitation occurs if one person, via their conduct, causes another person to be subjected to slavery, or a condition similar to slavery, servitude, forced labour, forced marriage and debt bondage.</p>
<ul style="list-style-type: none"> • <i>Slavery</i> 	<p>Slavery involves a person exercising any or all of the powers attaching to the right of ownership over one or more persons (including exercising a power in the course of trafficking women and children), where the person's conduct is committed intentionally or knowingly as part of a widespread or systematic attack directed against a civilian population.</p> <p>The definition of "exercising any or all of the powers attaching to the right of ownership over a person" includes purchasing, selling, lending, or bartering a person or imposing a deprivation of liberty on a person or exercising a power arising from a debt incurred or contract made by a person.</p>
<ul style="list-style-type: none"> • <i>Servitude</i> 	Servitude is a condition whereby a victim provides labour or services and, because of the use of coercion, threat or deception, a reasonable person in the position of the victim would not consider themselves to be free to stop providing labour or services, or to leave the place or area where they are providing labour or services
<ul style="list-style-type: none"> • <i>Forced labour</i> 	Forced labour occurs where a victim provides labour or services in circumstances where, because of the use of coercion, threats or deception, a reasonable person in the position of the victim would not consider themselves to be free to cease providing labour or services or to leave the place where they are providing labour or services.
<ul style="list-style-type: none"> • <i>Debt bondage</i> 	Debt bondage occurs where a 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, or the reasonable value of the services is not applied to the liquidation of the debt or purported threat.
<ul style="list-style-type: none"> • <i>Forced marriage</i> 	Forced marriage occurs where a victim enters into a marriage without freely and fully consenting because of the use of coercion, threats, or deception, or because the victim is incapable of understanding the nature and effect of the marriage ceremony when the marriage is entered into.
<ul style="list-style-type: none"> • <i>Worst forms of child labour</i> 	<i>The worst forms of child labour</i> involve situations where children are exploited through slavery or similar practices, including for sexual exploitation, or where they are engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs.
<ul style="list-style-type: none"> • <i>Deceptive recruiting for labour or services</i> 	Deceptive recruiting for labour or services occurs where a recruiter engages in conduct with the intention of inducing a victim to enter into an engagement to provide labour or services and the conduct causes the victim to be deceived about the extent to which the victim will be free to leave the place or area they provide services, the extent to which they will be able to cease providing services or labour, the extent to which they will be free to leave their place of residence or if there is or will be a debt owed or claimed to be owed by the victim in connection with the engagement, the quantum or existence of the debt owed or claimed to be owed, the fact that the engagement will involve exploitation or the confiscation of the victim's travel identity or travel documents or if the engagement is to involve the provision of sexual services – the fact, or the nature of sexual services to be provided (for example, whether those services will require the victim to have unprotected sex).
Suppliers	Any organisation or person who provides Synertec with goods or services, including their subcontractors, agents, related entities and consultants.

Supply chains	The products and services (including labour) that contribute to Synertec's own products and services. This includes products and services sourced in Australia or overseas and extends beyond Synertec's direct suppliers.
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5. Why Synertec has this policy

Synertec's approach to modern slavery seeks to build greater community, investor and customer confidence in our business.

Synertec seeks to be proactive in being aware of and reducing modern slavery risks within our operations and supply chains and we expect that the organisations we deal with will do the same.

5.1. Vendors

Vendors will be subject to appropriate pre-qualification, evaluation and assessment prior to any approval, engagement, and contract execution with Synertec.

When assessing which vendors to engage, Synertec will consider whether vendors are reporting entities covered by the Act, whether they have voluntarily elected to comply with the Act, whether they have a Modern Slavery Statement which complies with the Act and whether they have a Modern Slavery Policy.

Vendors will be required, where appropriate, to submit responses to questions about modern slavery requirements under the Act during the assessment stage, including confirming that they have no risks or evidence of modern slavery in their business or supply chains and that any actual risks of modern slavery practices are addressed and processes for assessing and addressing modern slavery risks have been remedied (with verifications via an internal or third-party audit process as required).

Vendors who are assessed as non-compliant with the Act, and who are unable to remedy this non-compliance in a reasonable timeframe, or who have not provided satisfactory responses to the questionnaire, will not be engaged by Synertec.

5.2. Procurement

Synertec will, where appropriate, introduce targeted due diligence initiatives on suppliers in higher risk industries to assess whether they are applying industry award rates and to assess whether their processes are ethical. The results of these checks and assessments may cause Synertec to review the use of those suppliers / supply chains and seek others who are not involved in modern slavery practices.

Synertec's contracts and extensions with suppliers will also, where appropriate, require suppliers, subcontractors and agents to warrant that they have not engaged in any collusive or anti-competitive behaviour in connection with any tender or their applicable supply agreement, which contains a modern slavery clause whereby the supplier, subcontractor and agent warrant to comply with applicable modern slavery laws, takes all reasonable and necessary steps to identify, investigate and eliminate modern slavery risks in their operations and supply chains, and provide all information reasonably necessary as requested by Synertec regarding their operations and supply chains to enable Synertec to comply with its obligations under modern slavery laws.

In addition, Synertec will seek to:

- Develop a supply chain map to show the geographic location and nature of sourced products and services to assist us to further identify any potential exposure in our supply chain.
- Introduce a requirement for approved and appointed subcontractors and suppliers to conduct regular reviews and audits of their business and supply chain on the processes for identifying, assessing, and eliminating modern slavery practices, and provide these audit reports to Synertec.

5.3. Third party compliance

Synertec requires its vendors and suppliers to adhere to its values, policies and procedures and will only work with vendors and suppliers who adhere to its standards.

5.4. Pay and conditions

Synertec will ensure that pay and conditions are properly managed and compliant with applicable laws across Australian territories for all our employees.

5.5. Awareness and Training

While all employees should have an understanding and awareness of what modern slavery is, specific training will be provided where appropriate for those involved in procurement processes to assist with limiting the risk of using suppliers who are using the unethical practices.

6. Breaches of this policy

Knowingly engaging in business with any organisation which uses modern slavery practices is in breach of this policy. Breaches of this policy will be subject to disciplinary or other appropriate action.

Synertec reserves the right to end a relationship with individuals or organisations if they breach this policy.

7. Reporting Concerns

If you have concerns and suspect a business may be using modern slavery, inform your manager of your concerns, who will in turn report the information to the Managing Director. It will then be the responsibility of the Board to take the appropriate action on behalf of the company which may be to contact the Australian Federal Police (on 131 237) who will then investigate. Reports may be made anonymously.

In an emergency or if you believe someone may be in immediate danger call the police on Triple Zero - 000 (in Victoria); for other states refer to local emergency numbers.

Revision History:

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Creation:	Created By:	Date:	Comment:	
0.01		02-Aug-2022	First draft	