Modern Slavery Policy

The requirements of the Modern Slavery Act 2018 (Cth) and SEC's organisational commitment to eliminate Modern Slavery from its operations and supply chains provide the basis for the SEC Modern Slavery Policy and Framework.

1. Purpose

1.1 The Modern Slavery Policy defines how SEC Victoria Pty Ltd (SEC) and its subsidiaries will conduct their business activities in accordance with the requirements set out in the *Modern Slavery Act 2018* (Cth) (the Act).

2. Scope

2.1 This policy applies to SEC and all workplace participants (all employees, contractors, consultants, directors, labour hire staff, students and graduates on work placement) in each SEC entity.

2.2 This policy sets the requirements and processes through which we select, engage and manage our partners, suppliers and overall supply chain, and assists SEC in identifying and addressing any risks of Modern Slavery in its business and commitments.

3. Objectives

3.1 The objectives of this policy are:

- to ensure that goods and services purchased through SEC's supply chains are provided and sourced by suppliers ethically, and to minimise the risk of Modern Slavery occurring in SEC's supply chains;
- to clearly communicate to other parties that SEC will only engage in business with those who maintain similar commitments to minimising the risk of Modern Slavery;
- to increase awareness of Modern Slavery by providing information to SEC employees on Modern Slavery, and to ensure a cohesive, organisation wide response to Modern Slavery risks; and
- to ensure that SEC maintains its compliance with the Act.

4. Definitions

4.1 The Act refers to Modern Slavery as practices such as (but not limited to):

- **Trafficking in persons** – recruitment, transportation, transfer, harbouring or receipt of persons, by means of threat or use of force or other forms of coercion, for exploitation.
- **Slavery** – the exercise of any or all of the powers attaching to the right of ownership over a person.
- **Servitude** – subjection of a person to conditions of servitude (i.e. state of being under the control of someone else and lacking freedom).
- **Forced or compulsory labour** – any work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself or herself voluntarily.
- **Debt bondage** – where the value of a person's labour is used to pay off a debt, and the person's labour is not freely disposable.
- **Forced marriage** – involves the marriage of a person (child or otherwise) without the free and full consent of both parties.
- **Child labour** – the employment of children in an industry or business, especially where it interferes with their ability to attend regular school or where it is mentally, physically, socially and morally harmful.
- **Deceptive recruiting for labour or services** – where someone is recruited with promises of decent work and pay but instead made to work for little or no wages.

4.2 Modern Slavery in Australia is a criminal offence under Divisions 270 and 271 of the *Criminal Code Act 1995 (Cth)* and is a violation of fundamental human rights.

5. SEC Policy Statement

5.1 SEC is committed to undertaking due diligence to identify and assess Modern Slavery risks, as well as remedial action to address and mitigate any adverse human rights impacts in any part of our business and supply chain.

5.2 To measure and ensure the continued effectiveness of our commitments, we endeavour to seek feedback and encourage reporting of policy breaches in accordance with section 9 of the policy, and to engage with our key stakeholders, communities and our supply chain.

5.3 SEC will not tolerate any of its employees, contractors or suppliers engaging in any form of Modern Slavery during the course of working with and for us. In particular:

- SEC employees are expected to identify, report and respond to any potential Modern Slavery incident or risk in SEC's operations and supply chains by reporting breaches or suspected breaches through the process outlined in section 9 of this Policy;
- SEC contractors and suppliers are expected to reduce and address any incident or risk of Modern Slavery in their own business and supply chains; and
- SEC contractors and suppliers are also encouraged to report (following the process in section 9 of this policy) any actual or suspected incident of Modern Slavery in any part of the SEC's business or supply chain.

5.4 Compliance with Modern Slavery obligations will be aligned with SEC's Compliance Policy and Compliance Management Procedures.

6. Roles and Responsibilities

Procurement Responsibilities:

6.1 SEC will engage in due diligence throughout its procurement processes. A key part of this due diligence is ensuring that all suppliers are compliant with the Act and adhere to the Victorian Government's Supplier Code of Conduct.

6.2 SEC will apply due diligence on the selection and engagement of third parties and suppliers.

6.3 The due diligence undertaken may include requesting the following information:

- details of the structure and operations of the party's supply chains including specific details of outsourcing or labour hire practices;
- details of the actions undertaken by the party to minimise and eliminate the risk of Modern Slavery within their supply chains and broader operations;
- the organisation's self-assessment regarding its compliance with the Act;
- a copy of the party's most recent Modern Slavery statement (if relevant) and Modern Slavery policies; and
- evidence of corrective actions if risks are identified.

6.4 SEC's contracts will include acknowledgements and obligations relating to Modern Slavery and human rights, as appropriate, having regard to the nature, risk profile and circumstances of the engagement. Such provisions may include:

- an obligation to comply with the Act;
- an obligation to comply with the Victorian Government's Supplier Code of Conduct, where relevant;
- a warranty that there is no Modern Slavery in the supply chains of the supplier;
- an acknowledgement of the supplier's responsibility to respect internationally recognised human rights and to use reasonable endeavours to minimise any adverse human rights impacts arising from its activities; and
- an obligation to identify, assess, address and promptly disclose to SEC any actual or potential instances of Modern Slavery or other adverse human rights impacts in connection with its business.

Business Unit Responsibilities:

6.5 The CEO and Senior Executives who report directly to the CEO are ultimately responsible for overseeing Modern Slavery risks within their operations and supply chains.

6.6 Modern Slavery risks and issues can arise as a result of any of SEC's operations or supply chains, therefore the day-to-day responsibility for managing human rights sits within each Business Unit. This includes implementing processes and controls to ensure compliance with this Policy.

6.7 The Business Units themselves are responsible for reviewing and overseeing human rights regulatory compliance with our policies and procedures.

7. Policy Breaches

7.1 Breach of the Modern Slavery policy and obligations will be managed through the SEC Compliance Policy and its associated Breach Management Procedures.

7.2 SEC Misconduct Policy will apply where it has been identified that SEC employees have breached this policy by engaging in, allowing, inducing, or conspiring to engage in any Modern Slavery. Disciplinary actions could, in the most severe circumstances, include immediate dismissal for misconduct or gross misconduct and, if warranted, legal proceedings.

7.3 If SEC contractors and suppliers breach this policy, SEC will engage with the relevant entity and take necessary action which may include terminating any service or supply contract.

8. Reporting

8.1 SEC will report annually to ensure compliance, transparency and accountability in addressing Modern Slavery risks:

- Report to the SEC Board on reported instances of suspected Modern Slavery in its supply chains, actions taken and progress made.
- Submit a Modern Slavery Statement in accordance with the Act.

9. Raising Concerns on Modern Slavery

9.1 We encourage all our Employees, Business Partners, contractors, suppliers, communities and customers to report and express any concerns relating to our activities and suspected violations of this Policy via the mechanisms described in our Whistleblower and Public Interest Disclosures Policy

9.2 As outlined in the Whistleblower and Public Interest Disclosures Policy, if a grievance is lodged, SEC will assess the information reported and determine an appropriate course of action. Should SEC be suspected of causing or contributing to a human rights violation, we are committed to investigating, addressing and responding to any concerns and taking the appropriate corrective actions if required.

10. How this policy can be accessed

10.1 This policy is central to SEC maintaining its ethical and legal standards and will be made freely available both internally and externally on the SEC website. Copies will also be made available upon request.

11. Key Contacts

11.1 The key contacts for this policy are:

- SEC Head of procurement
- General manager, Enterprise Risk and Compliance
- Any member of SEC's Enterprise Risk and Compliance Team
- Any member of SEC's Legal and Governance Team