

Anti-Slavery Policy Statement

Modern Slavery is a crime and a violation of fundamental human rights.

INTRODUCTION

RGF Staffing APEJ values human rights and is committed to ensuring our business is conducted according to ethical, professional and legal standards and in a fair, honest and open manner.

This policy describes modern slavery and outlines our commitments and the requirements we have of our people to adopt a zero tolerance for slavery practices.

Modern Slavery takes many forms including:

slavery: *This is where a person is treated as if they are owned by another, and that person is deprived of his or her freedom.*

forced labour: *This is where a person is forced to involuntarily work or provide services without fair remuneration and sometimes, under threat of a penalty.*

servitude: *This is where a person is coerced to work or to provide services and is forced to live on another person's property and does not have the means to change the circumstances.*

debt bondage: *This is a scenario where a person's labour or services is taken as 'security' for the repayment of a debt or other obligation. (Typically, in these arrangements, it is unlikely that the debt will ever be repaid and the arrangement is often ongoing)*

child labour: *This includes scenarios where children:*

- A. below the age of 12 are undertaking at least one hour of economic activity or 28 hours of domestic work or*
- B. between the ages of 12 and 14 years are undertaking at least 14 hours of economic activity or 42 hours of domestic work and economic activity*

trafficking: *This involves a person (or persons) who arrange or facilitate the travel of another person to be exploited. Often the person being exploited doesn't understand what is happening and has not provided their consent.*

forced marriage: *A person is forced to enter a marriage without freely and fully consenting, because of coercion, threats or simply because they are incapable of understanding the nature and effect of a marriage ceremony.*

SCOPE

This anti-slavery policy applies to all directors, officers, employees, contractors, sub-contractors, candidates, vendors, suppliers, partners, representatives, agents and others (collectively, you) and should be read in conjunction with our Code of Conduct, our Human Rights Workplace Statement and our annual Modern Slavery Statements, published to the register held by Australian Boarder Force. It is imperative that you comply with this policy at all times.



ZERO TOLERANCE (FOR SLAVERY) CONDUCT

What you must **not** do: ✘

- Partner with suppliers in high risk countries that do not comply with local labour laws of the country in which the recruiting takes place.
- Engage in any form of trafficking persons.
- Confiscate, hold, conceal or destroy or in any other way, deny an individual access to and possession of their identity or immigration documents, (e.g. passports or drivers' licenses)
- Use any forced labour for any work.
- Charge applicants, candidates or contractors any recruitment fees
- Use misleading or fraudulent practices during the recruitment and/or offer processes
- Make material misrepresentations during the recruitment and/or offering processes regarding:
 - key terms and conditions, wages and other benefits;
 - the employer and the location of work;
 - any significant costs to be borne by or chargeable to the employee (does this conflict with above), and
 - if applicable, the hazardous nature of the work (?)

What you **must** do ✔

- Provide a written employment contract, conditions of assignment, Statement of Works or other written form of agreement that clearly articulates the terms of the working or contractor arrangements, including the rights of the worker or contractor.

If required by contract or law:

- provide (or cover the cost of) transportation associated with employment deployments at both deployment commencement and end of deployment
- arrange accommodation or ensure that client provided accommodation meets our safety standards.

Commitment Statement:

RGF Staffing APEJ is committed to this Policy and has measures in place that are designed to prevent and identify Modern Slavery practices within our business and the business' in our supply chain. Our Modern Slavery Programme consists of the following:

1. Modern Slavery Statement

- Published & registered

2. Internal Awareness Program (MS-IAP)

- Internal training
- Suite of supporting policies & practices

3. Modern Slavery Assurance Program (MS-AP)

- Supply Chain Mapping
- Modern slavery risk assessments
- Associated mitigations and actions
- Consultation and engagement

4. Client and Supplier Engagement Principles (CSEP)

- Due Diligence activities
- Contract clauses

5. Reporting

- Whistle-blower Chanel
- Internal Audit
- External Audit

Audit and Review

RGF Staffing will perform audits and reviews from time to time, to confirm that business is being conducted in compliance with this Policy.

All of our employees and third parties are required to fully and promptly cooperate with any auditors appointed by us and must respond fully and truthfully to their questions, requests for information and documents.

Policy Breaches

If you believe or suspect a breach of this policy has occurred or is likely to occur, you must notify your manager in the first instance and Risk@rgfstaffing.com.au. Alternatively, if you are uncomfortable in making a disclosure internally, you may contact RGF Staffing APEJ Whistleblower hotline on **+61 2 9269 8600**

If you feel that your concern cannot be dealt with locally through any of the above channels, you can use the RGF Staffing Headquarters Whistleblower hotline via this [link](#).

Breaches of this policy, hindering investigations or providing false or misleading information may be grounds for disciplinary action, up to and including termination of employment or your contract.

