



O'BRIEN®
MODERN SLAVERY POLICY



Owned and authorised by: The Managing Director
Effective from: 20 May 2021 | Last updated: 20 May 2021

1. Purpose

The purpose of this policy (Policy) is to articulate the commitment of O'Brien® to address modern slavery, including human trafficking and severe labour exploitation. This policy is based on the UN Guiding Principles on Human Rights and the Modern Slavery Act 2018 (Cth) and outlines key principles which provide the foundation to our approach towards modern slavery.

As a trusted Australian brand, we understand the importance of operating our business responsibly and ethically. Part of the O'Brien® DNA is to care about people, which includes the people in our community, operations, and supply chain – including outside Australia. As such, the prevention, mitigation, and remediation of modern slavery is fundamental to our business practices and our company values. Further, this policy supports our efforts to comply with and further the aims of the Modern Slavery Act.

2. Scope

This policy applies to all team members, contractors, and suppliers in Australia and overseas. It includes all third-party suppliers and contractors engaged to provide goods or services to O'Brien® and its related entities, irrespective of the geographical location of their operations. More in-depth details of the requirements for our suppliers can be found in the O'Brien® Supplier Code of Conduct.

3. Modern slavery

Modern slavery refers to cases of human exploitation where the victim cannot refuse work or leave their place of work because of threats, violence, coercion, deception, or abuse of power. In the Australian Modern Slavery Act 2018 (Cth), the term 'modern slavery' includes eight types of serious exploitation, including forced labour, servitude, slavery, forced marriage, child labour, deceptive recruitment and debt bondage.

Modern slavery victims are often vulnerable to exploitation due to their migration status, or factors like poverty, lack of education, cultural inequalities, or barriers to accessing basic social protections. Modern slavery is more prevalent in certain geographic locations, industries and product or service types.

Modern slavery is usually a covert and criminal activity and the forms of coercion used to deprive victims of their freedom can be subtle and difficult to identify, including menace of harm (such as threats of arrest, deportation or violence against families), or the withholding of wages or confiscation of identity documents. Other significant aspects of modern slavery may include physical confinement, abusive living or working conditions and physical or psychological abuse. While issues such as underpayment, dangerous working conditions or unfair payment may not on their own constitute modern slavery, they are warning signs that it may be occurring and potentially are breaches of our codes of practice being the Supplier Code of Conduct or Our Way of Working and the Employee Code of Conduct.

4. *The O'Brien® Commitment*

O'Brien® is committed to have zero tolerance towards modern slavery in all forms including human trafficking, forced labour and child labour. We recognise that modern slavery is a complex issue, and that our activities and supply chain may be unintentionally linked to modern slavery practices.

We are committed to taking steps to mitigate and remediate modern slavery in our supply chain, to protect potential victims of modern slavery and to contribute to the prevention of modern slavery risks in future.

We care about the way our team members, our suppliers and our partners conduct their business. We extend our ethical commitments beyond our own operations and seek to work with suppliers and subcontractors that share our standards.

5. *Requirements*

We expect everyone bounded to this Policy, including our leadership, teams and suppliers, to:

- Comply with relevant legislation in their area of operation
- Not engage in any forms of forced or compulsory labour, human trafficking or debt bondage
- Not engage in child labour, consistent with International Labour Organisation guidance with regard to the employment of children and young persons
- Provide and contribute to safe working conditions, fair wages and reasonable working hours
- Not engage in discrimination, harassment, violence, coercion, inhumane treatment, or the withholding of pay or benefits
- Respect the right to freedom of association and collective bargaining
- Maintain appropriate and accessible grievance mechanisms, and report breaches of this policy or any suspected incident of modern slavery, in line with the Whistleblower Policy (see also below 'Reporting')
- Escalate and investigate any suspected breach of this policy or suspected case of modern slavery, ensuring that the rights and wellbeing affected persons are protected
- In the case of suspected modern slavery, provide remediation with the aim of protecting victims and preventing the recurrence of issues
- Adopt and implement appropriate plans and policies in relation to human rights and modern slavery
- Act collaboratively and engage in dialogue with suppliers, partner organisations and civil society
- Actively raise awareness of modern slavery with staff and suppliers

6. Reporting

We expect and encourage employees, suppliers, and sub-contractors to report any concerns regarding modern slavery, including confirmed cases as well as suspected cases or areas of concern. Reports can be made to the O'Brien® procurement representatives and/or in accordance with our Whistleblower Policy which includes access to the Speak Up hotline, 1800 121 889. O'Brien® encourages a two-way dialogue with suppliers, without fear of retribution in regard to any concerns or grievances that are raised.

7. Breach of this Policy

All suspected breaches will be investigated and appropriate disciplinary and remedial action taken. Employees who do not strictly comply with this policy may face disciplinary action, including formal warnings and termination. We may terminate our relationship with suppliers and other third parties if they breach this Policy.

8. Remediation

Where modern slavery cases or suspected cases arise, O'Brien® will engage collaboratively with suppliers and everyone bounded to this policy to identify and implement measures to protect the victims and contribute to the future prevention of more modern slavery cases.

9. Roles and responsibilities

All staff (managers and team members) are responsible for:

- Following the requirements of this policy
- Participating in modern slavery training as required
- Keeping their eyes open for modern slavery signs
- Reporting confirmed or suspected cases of modern slavery in any part of the O'Brien® business or its supply chains as soon as possible
- Where reasonable, monitoring and supporting the ability of suppliers and sub-contractors to follow this policy and the O'Brien® Supplier Code of Conduct

If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of our supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager.

Suppliers and Sub-Contractors are responsible for:

- Following the requirements of this policy and the O'Brien® Supplier Code of Conduct
- Making efforts to strengthen their modern slavery policies and mitigation actions in respect of their business and their supply chains.
- Reporting any case of suspected modern slavery to your O'Brien® procurement representative or through the Speak Up hotline.

10. *Related policies and documents*

- Employee Code of Conduct
- Our Way of Working
- Whistleblower Policy
- O'Brien® Supplier Code of Conduct

11. *Review and publication of this policy*

This Policy will be reviewed at least every two years to ensure it remains consistent with all relevant legislative requirements, as well as the changing nature of the business. This Policy may be amended, withdrawn, or replaced from time to time at the discretion of O'Brien®. Upon request, a copy of this Policy will be distributed to team members, suppliers, and directors and is also available on the O'Brien® intranet.