

Introduction and Scope

CleanCo (**We, Our or Us**) is opposed any form of human exploitation in our supply chain or elsewhere. We are committed to consistently identifying risks of such exploitation and unethical sourcing practices and putting processes in place to prevent this. This policy applies to all CleanCo's suppliers and extends to their employees, officers and sub-contractors.

Purpose

The purpose of this policy is to:

- Embed human rights considerations into CleanCo's procurement practices
- Protect the rights of individuals who may be bound by modern slavery;
- Promote an open and transparent culture across our supply chain;
- Adhere to reporting requirements;
- Ensure suppliers are aware of and adhere to this policy; and
- Ensure that matters of unethical and inhumane treatment of individuals are identified and dealt with appropriately.

What is Modern Slavery?

Modern Slavery can take many different forms and refers to instances of human exploitation where the victim cannot refuse or leave. It can include:

- Trafficking in persons;
- Slavery;
- Servitude;
- Forced labour;
- Forced marriage;
- Debt bondage;
- Child labour; and
- Deceptive recruiting for labour or services.

The operative provisions of the *Modern Slavery Act (MS Act)* came into effect on 1 January 2019. Under the MS Act businesses based or carrying on business in Australia with an annual revenue of over \$100 million are required to report annually on the risks of modern slavery in their operations and supply chains, and what they are doing to address those risks.

In addition to the MS Act, the *Human Rights Act 2019 (Qld) (HR Act)* came into effect on 1 January 2020, and s18 of the HR Act relevantly provides that a person must not be held in slavery or servitude or be made to perform forced labour. The HR Act makes it unlawful for a public entity, such as a GOC, to act in a way that is incompatible with human rights or to fail to give proper consideration to human rights when making decisions.

Embedding anti-slavery practices

To underpin its commitment to anti-slavery, CleanCo commits:

- We will conduct risk assessments to determine which parts of the business and which supply chains are most at risk from modern slavery so efforts can be focused on those areas
- Where appropriate, as informed by the risk assessment, CleanCo will engage directly with new suppliers in order to understand how they ensure that modern slavery and or human rights abuses are not occurring`.
- Under the Code We require our suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.

Mandatory Reporting

CleanCo must complete annual reports addressing mandatory criteria known as Modern Slavery Statements (**MSS**). A Board-approved MSS must be submitted as a standalone document to The Australian Border Force within 6 months after the end of the financial year, and if accepted will be held by the Minister for Home Affairs in a public online register.

The MS Act has seven mandatory reporting criteria requiring the MSS to identify:

- The reporting entity;
- Its structure, operations and supply chains;
- The risks of modern slavery practices in the entity's operations and supply chains, and those of any entities that it owns or controls;
- The actions the entity has taken – or that any entity it owns or controls has taken – to assess and address those risks, including due diligence and remediation processes. For example, this may include the development of policies and processes to address modern slavery risks, and providing training about modern slavery to staff;
- How the entity measures the effectiveness of those actions;
- The entity's consultation process with entities covered under the statement; and
- Any other information that may be relevant.

Further information is available in the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities.

Roles and Responsibilities

- The **CleanCo Board** ensures an appropriate framework exists to guard against modern slavery and human rights considerations. The Board also approves the CleanCo MSS.
- The **Chief Executive Officer (CEO)** implement and administers the framework guarding against modern slavery and human rights considerations and for related reporting. The CEO designates responsibility for the operation of this policy to the General Manager Performance Risk and Finance and Company Secretary.
- The **General Manager Performance Risk and Finance** is responsible for:
 - Mapping CleanCo's structure, operations and supply chain;
 - Reviewing and approving this policy and ensuring the mandatory reporting requirements (preparing the MSS) are met;
 - Formally communicating this policy to all staff at least once a year and at induction of new staff and ensuring that staff are trained on this policy; and
 - Identifying systemic risks, issues or trends, correcting them and communicating this within CleanCo and to suppliers, thereby increasing awareness.

- The **Company Secretary** is the person responsible for:
 - Managing all disclosures of Reportable Conduct;
 - Regularly reporting on cases of Reportable Conduct to the **Audit & Risk Committee**.
- **Line Managers** and **General Managers** are responsible for ensuring staff and suppliers adhere to this policy and for taking Reportable Conduct to the Company Secretary.

Disclosures concerning Modern Slavery

Anyone who is aware of known, suspected, or potential cases of Reportable Conduct is expected to make a disclosure under this policy. CleanCo has several channels for making a report about any issue or behaviour considered to be Reportable Conduct.

The matter may be raised with:

- your line manager or General Manager;
- the Human Resources Manager; or
- the Company Secretary

All reports received must be provided to the Company Secretary and communicated via the following methods:

Phone: 0401 096 393

Email: company.secretary@cleancoqld.com.au

Mail: Reportable Conduct
C/- Company Secretary
12 Creek Street
Brisbane QLD 4000

Compliance

Failure by a supplier to notify CleanCo in a timely manner of a suspected breach of the MS Act or HR Act may place current or future contracts at risk.

Failure by a CleanCo employee to disclose a suspected breach of the MS Act or HR Act may result in disciplinary action being taken up to and including termination of employment or other engagement by CleanCo.

Investigation of disclosures

CleanCo will investigate all matters disclosed under this policy as soon as possible after disclosure. The investigation will be conducted in an objective and fair manner and where relevant in accordance with CleanCo's Whistleblower Protection Policy and related procedures. The Company Secretary will report to the Audit & Risk Committee on the number and type of incident reports annually, to enable CleanCo to address systemic issues as needed.

References

This policy is to be read in conjunction with the following CleanCo policies and procedures:

- Code of Conduct
- Protected Disclosure Procedure
- Anti-bribery and Corruption Policy
- Whistleblower Protection Policy, Protected Disclosure Procedure and Public Interest Disclosure Procedure

The following legislation and guidance also apply to this policy:

- Australian Government Department of Home Affairs *Modern Slavery Act 2018 Draft Guidance for Reporting Entities*
- *Income Tax Assessment Act 1936* (Cth)
- *Modern Slavery Act 2018* (Cth)
- *Human Rights Act 2019* (Qld)

Definitions

The following definitions apply to this policy:

CleanCo	CleanCo Queensland Limited.
Discloser	A person who alerts CleanCo and/or a regulatory authority to Reportable Conduct.
Modern Slavery Act (MS Act)	<i>Modern Slavery Act 2018 (Cth)</i>
Reportable Conduct	This includes conduct which: <ul style="list-style-type: none">▪ Is dishonest, fraudulent or corrupt, including bribery or other activity in breach of CleanCo's <i>Anti-bribery and Corruption Policy</i>;▪ Is illegal (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);▪ Is unethical (such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching CleanCo's <i>Code of Conduct</i> or other policies or procedures);▪ Is potentially damaging to CleanCo, a CleanCo employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of CleanCo property or resources;▪ Amounts to an abuse of authority;▪ May cause financial loss to CleanCo or damage its reputation or be otherwise detrimental to CleanCo's interests;▪ Involves harassment, discrimination, victimisation or bullying; or▪ Involves any other kind of serious impropriety.

Document governance

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Approved by:	CleanCo Queensland Limited Board
Periodicity of review:	Annual
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