

Modern Slavery

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1 INTRODUCTION

This statement is issued by the Northline group of companies and their related bodies corporate.

Modern slavery is a growing and complex problem for businesses. It describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

It is an umbrella term for a number of serious exploitative work practices that represent violations of human rights. Without limitation, modern slavery may occur in the form of trafficking in persons, servitude, forced labour, child labour, debt bondage, unlawful underpayment, poor working conditions, and deceptive or coercive practices when recruiting for labour.

Northline is committed to maintaining a culture of legal compliance, ethical sourcing and respect for human rights. Northline will work with its stakeholders including throughout its supply chain to address issues relating to acts of modern slavery, and will be conducting activities to identify, prevent and remedy such acts.

Northline has reporting obligations under the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW). This statement is to be read in conjunction with statements issued by Northline in compliance with its obligations under these acts.

2 PURPOSE

The purpose of this statement is to help deter any unlawful or improper practices by Northline, its officers, employees, suppliers and agents in our global supply chain in relation to the sourcing of labour, services and products; in particular, practices which constitute, support, condone, or which are at risk of being acts of modern slavery.

It does so by setting out minimum standards expected by Northline from within its own business units, and which are expected from its suppliers, including its contractors for transport services.

3 DEFINITIONS

Word/Term	Definition
Bonded Labour	work, which is not for compensation received by the employee, but to repay a debt, which is often incurred by another person offering the employee's labour in exchange.
Financial Year	each 12-month period commencing on 1 July and ending on 30 June.
Forced Labour	any work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person.
Indentured Labour	any work in which an employer forbids employees from leaving employment at the employee's discretion.

4 COMPLIANCE TO MINIMUM STANDARDS

Northline complies with all of the minimum standards in this statement. Northline will monitor its suppliers' compliance of these minimum standards.

Where sub-contracting is permitted, suppliers must have adequate processes in place for properly managing sub-contractors to ensure that they operate in accordance with these minimum standards.

4.1 Bonds, Deposits and Forced Savings

Employment shall be freely chosen:

- a) employees are not subject to any form of forced labour, bonded labour, or indentured labour;
- b) employees do not have a portion of their pay withheld at any time as a condition of obtaining or retaining employment nor required to participate in savings programs.
- c) the freedom of movement of employees is respected. Employees are not be restricted in their movement by control of identity papers, by holding money deposits or by taking any other action to prevent employees from terminating their employment
- d) employees are free to leave their employ after reasonable notice.

4.2 No Child Labour

Northline does not tolerate child labour and respects children's right to personal development and education. The minimum working age is the age of completion of compulsory school, but never less than 15 years.

4.3 Migrant Employees

Migrant employees have entitlements stipulated by law.

Employees are not required to surrender identification or immigration documents or denied access to any employee's identity or immigration documents.

Employees employed through a third-party agent or contractors are the responsibility of suppliers, and as such, these minimum standards apply to such employees.

4.4 Hiring Arrangements

All work is engaged on a voluntary basis.

Recruiters or suppliers that do not comply with local labour laws must not be engaged.

Each employee is provided with a clear, understandable labour contract containing all legally required employment terms, entitlements and conditions.

Written contracts of employment are provided to employees in language the employees understand, clearly indicating their rights, responsibilities and conditions of employment, including wages and rates of pay, benefits, working hours, locations of the work, transportation to and from the work site (if applicable), living conditions, housing and associated costs, work-related hazards, and other working and employment conditions.

No deceptive or coercive practices during recruitment or employment are used; for example, making material misrepresentations about the key terms and conditions of employment.

Permanent employment for employees is provided where possible and labour-only contracting arrangements, consecutive short-term contracts, excessive piece-work or false apprenticeship schemes are not employed.

4.5 Wages, Benefits, and Transparent Record Keeping

At a minimum all laws regulating local wages, overtime compensation and legally mandated benefits are complied with.

Record keeping is accurate and transparent. Wage payments will be made at regular intervals and directly to employees, in accordance with applicable law, if any, and will not be delayed, deferred, or withheld.

Employees are provided with written and understandable information about their employment conditions before they enter employment and about their wages for each pay period.

Deductions from wages for disciplinary measures or any deductions from wages not provided for by law does not occur without the express permission of the employee concerned.

All disciplinary measures are recorded.

4.6 Working and Rest Hours

Working and rest hours comply with applicable laws, including heavy vehicle national laws.

Employees may be required to work reasonable additional hours in accordance with workplace laws.

4.7 Working Conditions

A safe and hygienic working environment is provided where employees potential exposure to safety hazards are identified, assessed and controlled through proper risk assessment and safe work procedures.

Employees receive adequate and regular training to perform their jobs in a safe manner.

Personal protective equipment including access to first aid supplies is provided and employees are trained in their use.

Where accommodation is provided, it will be clean, safe and meet the basic needs of employees.

Employees have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation. Employees have the right to refuse work that is unsafe.

4.8 Freedom of Association, Grievance Mechanisms and Recourse

The rights of employees to lawfully associate or not to associate with groups of their choosing is respected, as long as such groups are legal in the country of employ.

Employees have the right to join or form trade unions of their choosing.

No interference, obstruction or prevention of legitimate related activities, such as collective bargaining, takes place. Employees are allowed to select employee representatives.

Representatives are not discriminated against and have regular access to company management or appropriate process in order to address grievances and other issues.

PRD-78 Whistleblower Reporting and Protection provides a procedure for employees to approach management on issues of concern, on their own or through employee representatives, confidentially.

4.9 No Discrimination

All conditions of employment are based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation.

All employees, irrespective of their nationality or legal status, will be treated fairly and equally.

Employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.

Migrant employees are provided conditions of work no less favourable than those available to country nationals (including but not limited to wages, benefits, and accommodation if applicable).

Migrant employees (or their family members) are not threatened with denunciation to authorities to coerce them into taking up or maintaining employment.

4.10 No Harassment or Abuse

Employees are treated with dignity and respect and our workplaces are free of any form of harassment or inhumane treatment including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.

Disciplinary policies and procedures are clearly defined and communicated to all employees, and do not include any inhumane disciplinary measures, including corporal punishment, mental or physical coercion, or verbal abuse of employees. The use or threat of physical or sexual violence, harassment, and intimidation against an employee, his or her family, or friends and associates, is prohibited.

Disciplinary procedures do not include sanctions that result in wage deductions, reductions in benefits, or compulsory work.

5 RISK MANAGEMENT

Northline shall adopt as a minimum; the risk management controls in the procedure as follows:

5.1 Accountability for Modern Slavery Issues, with an identified risk manager

Northline acknowledges accountability for addressing modern slavery risks and issues in operations and supplier contracts. Responsibility for co-ordinating management of such risks and issues is assigned to the National HSEQ and Compliance Manager.

5.2 Supply Chain Mapping and Risk Assessment

The risk assessment must initially address the modern slavery risks of Tier 1 suppliers and then assess those suppliers beyond Tier 1 who are determined by the business unit to be high risk.

5.3 Due Diligence

Due diligence on new suppliers must be made to determine their risk level and control procedures in relation to ethical sourcing and modern slavery as appropriate for its business. In doing so, those standards described in section 5 must be applied.

5.4 Audit and Compliance Program

To confirm compliance with this statement, annual audits on Tier 1 suppliers will be carried out. Such audits will extend beyond Tier 1 suppliers as much as is practically possible each year.

5.5 Training

It is most important that employees are well engaged in human rights and modern slavery issues, and in the identification and understanding of reporting them. In addition to releasing and communicating this statement to all employees, an eLearning module is being developed for inclusion in our induction program.

More detailed training inclusive of risk management principles is provided to all employees involved in procurement.

5.6 Complaints Mechanism

Northline has an accessible and well-publicised reporting mechanism for concerns or disclosure in relation to modern slavery which allows for confidential and anonymous reporting and provides protection from reprisal. Clear processes for investigating and reporting on the issues raised through the reporting mechanism are in place.

5.7 Remediation

Northline is committed to working with suppliers to remediate any breaches of the requirements in this statement.

5.8 Stakeholder engagement

Northline has a formal approach to stakeholder engagement in place.

5.9 Review and Report

For each financial year, Northline must monitor and review the effectiveness of the risk management measures described above.

6 AVAILABILITY AND REVIEW OF STATEMENT

This statement is published on Northline's website and on Northline's intranet, and is reviewed annually.

At the sole discretion of Northline, this statement may be amended from time to time to ensure it remains effective and consistent with all relevant legal requirements.

7 FURTHER INFORMATION

Further clarification on any matter relating to this statement may be sought from Northline's Legal Services department by emailing the enquiry to legal.services@northline.com.au.

Please note that Northline's Legal Services is unable to provide any legal advice, and that any advice given does not constitute legal advice.