

MODERN SLAVERY POLICY

REFERENCE:	TBG.v03 11/2025
OWNERSHIP:	Group Compliance
AUTHORISED BY:	EGM – Corporate Services
REVIEW:	11/2027

“Slavery is not a thing of the past. Millions of women, children and men around the world are trapped in slavery, today. There are more slaves now than any other time in history.” International Labour Organisation.

PURPOSE

On 1st January 2019 the [Modern Slavery Act 2018](#) (‘the Act’) came into effect and was established to combat modern slavery in the domestic and global supply chains of goods and services. The Act establishes a practical, risk-based reporting framework to support the Australian business community to identify and address their modern slavery risks.

The purpose of this policy is to outline The BUSY Group’s (TBG) commitment in relation to assessing and reducing the risks of modern slavery within our business governance, operations and our supply chain and to promote greater awareness across The Group and its entities.

SCOPE

This policy applies to all employees, directors, contractors and volunteers within The BUSY Group (TBG) including all of its Australasian legal entities.

DEFINITIONS

Mandatory Reporting – applies to organisations with an annual consolidated revenue of more than AU\$100m. This includes entities in international jurisdictions covered by equivalent modern slavery legislation.

Modern Slavery – describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, deceptive recruiting for labour or services and the worst forms of child labour.

National Employment Standards (NES) and NZ Minimum Employment Standards (NZ MES) - minimum employment entitlements that have to be provided to all employees in Australia and NZ, respectively. Other



workplace instruments such as employment contracts cannot provide for conditions that are less than or exclude the NES/NZ MES.

Protected Disclosure – is given the meaning referred to in the TBG Whistleblower Protection Policy.

Suppliers/Vendors – any organisation or individual who provides TBG with goods or services, including subcontractors, agents, related entities and consultants.

Supply Chain – the network between an organisation and its suppliers to produce and distribute a specific product or service (including labour). The entities in the supply chain include producers, manufacturers, suppliers/vendors, warehouses, transportation companies, distribution centres, retailers and service providers.

1. Governance

TBG is focussed on sustainable business growth to meet our vision – to have more people in jobs, more people learning new skills, and more communities exposed to positive change, in partnership with employers and industry. Risks of modern slavery will form part of the due diligence process for any new venture to ensure ethical investments are considered.

TBG is committed to ensuring the health, safety and wellbeing of our employees and maintain a suite of company policy documents, which are informed by relevant legislation in each jurisdiction. Employment arrangements are strictly bound by the employment standards, relevant award conditions in each country and outlined in each employment contract.

2. Operations

TBG acknowledges that modern slavery risks can be linked to certain sectors such as cleaning, hospitality, agriculture, textiles production and some types of manufacturing.

TBG raises awareness of modern slavery risks throughout all levels of the organisation by ongoing training and communication. Through our programs and working with industry, TBG will ensure staff who work with program participants (often vulnerable cohorts) are educated in identifying potential risks of modern slavery and other human rights principles by:

- a) Training staff to identify unusual employer behaviour and supplier industries and services that present higher modern slavery risks. All staff are required to complete the mandatory Modern Slavery Awareness module upon onboarding and annually thereafter. Additional training is provided to staff who work within the areas of the organisation that have increased contact with suppliers and employers, such as Business Support and the Group Training Organisation.

- b) Following program specific guidelines in relation to TBG's responsibility in assessing employment conditions e.g. validating award rates of pay, undertaking workplace risk assessments.
- c) Educating employers where to find employment related information and resources such as the Fair Work Ombudsman.
- d) Educating suppliers by providing resources that raise awareness of modern slavery practices within supply chains.
- e) Ensure program-based job advertisements are free from discrimination and role assessment is based on the 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 or political affiliation
- Undertaking periodic monitoring of employer behaviour within our programs such as frequent turnover and targeting of specific cohorts.

3. Supply Chain

In order to monitor and manage contract arrangements, the following processes are adopted:

Business Support Team

- a) Prior to entering into contractual arrangements, ensure new and existing suppliers complete a *Preferred Supplier Application*, which outlines obligations and gathers information regarding modern slavery awareness and practices.
- b) Conduct an initial assessment of the information provided by suppliers, to identify risk factors such as particular industries and products/services that are at higher risk of modern slavery.

Any procurement or supplier that is rated medium or high risk will progress to a more detailed risk assessment.

Group Compliance:

The risk assessment section of the *Preferred Supplier Application* automatically escalates any procurement rated as medium or high risk to the Group Compliance Team for further assessment. As required, this more robust assessment will be carried out using a comprehensive questionnaire '*Eliminating modern slavery toolkit*' developed by the Queensland Government. This questionnaire has been designed as a tool to facilitate collaborative two-way engagement between agencies (and their partners) and suppliers. It provides for adjustment proportionate to the level of risk of the procurement and as appropriate to prevent barriers to participation by small and medium enterprises, social enterprises and First Nations businesses.

Where a procurement is deemed high risk, this will be flagged early in the procurement process and the questionnaire will be incorporated into the contract application process, to assist TBG in learning more in depth information about the suppliers operations when it comes to addressing modern slavery risks.

These cases are to be presented to the Governance and Risk Committee for review and oversight.

4. Reporting of Modern Slavery Concerns

TBG employees must disclose any suspicions of modern slavery to their line manager and to the Group Compliance Team via the [Modern Slavery Notification form](#). If a suspected case of modern slavery is disclosed, Group Compliance will refer to the [Modern Slavery Response Protocol](#) (appendix A), which describes the process for reporting suspected instances of modern slavery exploitation at a domestic or international level.

In conjunction with this policy, TBG employees are encouraged to review the TBG Whistleblower Protection Policy which provides a framework for receiving, investigating and addressing allegations of *reportable conduct*, which includes any suspicion of modern slavery within the organisation or supply chains. Any disclosure made in relation to modern slavery is a 'protected disclosure' as per the Whistleblower Protection policy.

5. Mandatory Reporting Requirements

The Act requires organisations with an annual combined turnover of \$100 million to publish a Modern Slavery Statement ('the Statement') on an annual basis, to report on how they are preventing and addressing modern slavery risks in their operations and supply chains.

The statement encompasses all entities across the organisation and therefore covers reporting requirements in all relevant international jurisdictions that have enacted Modern Slavery legislation.

TBG's statement is submitted to the Modern Slavery Register (administered by the Attorney General's Department) in December each year, reporting on the preceding financial year (1st July to 30th June).

6. Ongoing Review and Assessment

As part of the organisation's internal monitoring schedule, compliance of this policy against legislation and best practice will be undertaken. Group Compliance will ensure required amendments are incorporated within other relevant policies and procedures such as the Purchasing and Procurement Policy and Preferred Supplier Application and will support relevant teams to conduct regular reviews of vendors and preferred suppliers.

TBG is committed to the ongoing review of how the organisation assesses and manages modern slavery-related issues in line with best practice and amendments to the Act.

TBG's internal and relevant entity committees will ensure continued corporate governance and risk oversight of the relevant legislative obligations, policies and practices impacting the organisation in relation to modern slavery.

The Governance and Risk Committee (Board subcommittee) will monitor the implementation of the commitments outlined in the Modern Slavery Statements and mandatory reporting requirements via annual review.

POLICY CONTEXT

This procedure relates to the following legislative requirements, standards and internal documents:

Resources	<ul style="list-style-type: none"> • Modern Slavery Act 2018 • Australian Fair Work Ombudsman • Australian Government - Modern Slavery • Attorney Generals Department - Modern Slavery Resources
Related Forms & Documents	<ul style="list-style-type: none"> • TBG Modern Slavery Notification • TBG Modern Slavery Statement (Annual Report) • TBG Whistleblower Protection Policy • Purchasing and Procurement Policy • Preferred Supplier Application • Legislative Compliance Register - Folio

VERSION CONTROL

Version	Date	Change Summary	Author/Reviewer	Approved by:
3	Nov 2025	Updated risk assessment process and included supplier questionnaire. Updated Response Protocol for reporting of international concerns.	Group Quality and Assurance Manager	EGM - CS
2	Sept 2023	Information pertaining to mandatory reporting (Statement) updated. Included 'Response Protocol' Appendix A and link to Modern Slavery Notification form.	Group Compliance Manager	Group CEO
1	Sept 2021	Document inception	Group Compliance Manager	Group COO

MODERN SLAVERY RESPONSE PROTOCOL

APPENDIX A

This protocol describes the steps to report suspected instances of modern slavery exploitation at a local or international level to TBG Group Compliance and law enforcement bodies. This will ensure the situation is investigated and handled in the most appropriate way and victims are identified and protected, as incidences can often be linked with violence or criminal activity.

Identification can occur directly through procurement due diligence processes, or information supplied by an employee, a member of the public, a supplier or through national or international media reports.

Reporting Modern Slavery in Australia

Local findings or allegations occur when TBG or one of its subsidiaries becomes informed of or identifies allegations that a supplier is engaging in modern slavery in Australia.

Step 1 – Report and Record

1. Report the allegation or suspicion to your Manager and the TBG Group Compliance Team. This reporting avenue is confidential and available for employees, suppliers or anyone in the community to make a disclosure.
2. Record the allegation or suspicion via the TBG [Modern Slavery Notification form](#).
3. TBG Group Compliance Team will ensure the Executive Leadership Team are briefed on the reported allegation and actions being taken.
4. Importantly,
 - If someone is in immediate danger, or a child is concerned, call Triple Zero (000),
 - Do not engage further with the supplier on the allegation,
 - Do not attempt to further investigate or verify the allegation, and
 - Maintain privacy and confidentiality of complainants, where necessary.

Step 2 – Investigations/Action

1. Allegations reported via the TBG [Modern Slavery Notification form](#) will be investigated and appropriate action taken, including escalating to law enforcement authorities if required.
2. If determined to be credible, the allegation will be referred to the Australian Federal Police (AFP). The AFP determine whether criminal conduct has occurred and refer any victims to a government support program.

Step 3 – Plan a Remedy

1. If the allegation is about an Australian supplier and is determined to be credible, TBG will work with the AFP, other Australian Government authorities and stakeholders to develop and implement a plan to action contractual remedies if applicable, to reduce harm caused and how future instances can be detected or prevented.
2. If criminal conduct has occurred, Australian Government authorities initiate legal action against offenders.



International findings – reporting modern slavery in supply chains overseas

International findings or allegations occur when TBG becomes informed of, or identifies allegations that, a supplier is engaging in modern slavery in its supply chains overseas, including countries where we have operations such as the UK, NZ or Canada.

For advice or to report suspected modern slavery in international supply chains contact the following agencies:

1. Australian Federal Police: 131 237
2. The Australian Border Force's Modern Slavery Business Engagement Unit – via the Attorney Generals Department: slavery.consultations@ag.gov.au
3. 1800 FREEDOM Helpline: 1800 373 3366

Refer to the Australian Border Force [modern slavery resources](#) for further guidance.