



## Anti-Slavery & Human Trafficking Policy

### 1. Policy Statement

Consistent with the values of ARA Group Limited (ARA) our policy is to always conduct our business in an honest and ethical manner.

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 ARA has zero-tolerance on modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3 ARA is also committed to ensuring there is transparency in our own business and in our approach to modern slavery throughout our supply chains, consistent with our disclosure obligations under current Australian Law.
- 1.4 ARA expects the same high standards from all of our contractors, suppliers and other business partners and as part of our contracting processes, ARA will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects that our suppliers will hold their own suppliers to the same high standards.

### 2. About this Policy

- 2.1 This policy applies to all persons working for ARA or on our behalf in any capacity, including employees at all levels, directors, managers, officers, agency workers, sub-contractors, external consultants, third-party representatives and business partners.

### 3. Who must comply with this Policy

- 3.1 ARA's Board of Directors and the Senior Management team have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 ARA's Senior Management team and our line managers have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.3 Management at all levels of ARA are responsible for ensuring those reporting to

them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

- 3.4 You must ensure that you read, understand and comply with this policy.
  - 3.5 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is all our responsibility and to avoid any activity that might lead to, or suggest, a breach of this policy.
  - 3.6 You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may in the future.
  - 3.7 You are encouraged to raise concerns about any issue or suspicion of modern slavery in our business or in our supply chains with any supplier at the earliest possible stage.
  - 3.8 If you believe or suspect a breach of this policy has or may occur you must notify your line manager or report it in accordance with our Whistleblowing Policy.
  - 3.9 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise your concern with your line manager.
  - 3.10 ARA encourages openness and supports anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. ARA is committed to ensuring that no one suffers any detriment as a result of reporting a fairly held suspicion that modern slavery may be taking place in any part of our own business or in any of our supply chains.
4. Communication and awareness of this policy
    - 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.
    - 4.2 ARA's zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as necessary afterwards.
5. Breaches of this policy
    - 5.1 Any employee who breaches this policy will face disciplinary action, which may result in dismissal.
    - 5.2 ARA may terminate our relationship with any individuals or organisation we work with if they breach this policy.
6. Interaction with other Workplace Policies and Procedures
    - 6.1 This Anti-Slavery and Human Trafficking Policy interacts with other policies which can be found on our intranet, The Bridge. All those to whom this policy applies are encouraged to familiarise themselves with the policies detailed below. If you have any query please contact your line manager or a member of the ARA Senior Management team.

## 7. Definitions

### Slavery

- The state or condition of being a slave; a relationship whereby one person has absolute power over another and controls their life, liberty, and fortune
- The subjugation of a person by another person, in being forced into work
- The condition of being subject to some unwanted influence
- Work done in harsh conditions for low or no pay

### Servitude

- The state or condition of a slave
- The state or condition of being subject to or dominated by another person

### Forced and compulsory labour

- Labour done because of coercion or intimidation

### Human Trafficking

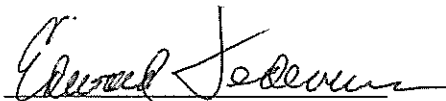
- Human trafficking is the trade of humans, most commonly for sexual slavery, forced labour, or commercial sexual exploitation

### Child labour

- The employment of children in an industry or business, especially when illegal or exploitative

### Related policies

- Whistleblowing Policy
- Corporate Social Responsibility Policy (CSR)
- Employee Grievance Policy



Edward Federman  
Group Managing Director

3 October 2018