

DUNCAN YOUNG CONSULTING

leadership & communication

MODERN SLAVERY POLICY

Duncan Young Consulting Pty Ltd (DYC) acknowledges and pays our respects to First Nations knowledge holders and recognise the unceded lands on which we live, work and learn.

Purpose

This policy affirms Duncan Young Consulting's (DYC) belief in responsible social and ethical behaviour from all employees. This policy clarifies the standards of behaviour that Duncan Young Consulting expects of all employees and contractors.

Principles

Our employees contribute to the success of our organisation and that of our clients. DYC fully endorse that all employees are not deprived of their basic human rights.

Furthermore, our employees have an obligation to the Business, our clients and themselves to observe high standards of integrity and fair dealing. Unlawful and unethical business practices undermine employee and Client trust.

Policy

At Duncan Young Consulting (DYC) we recognise that we have a responsibility and opportunity to help eliminate modern slavery through our own actions and by working with our suppliers. responsibility and opportunity to make an enduring and positive contribution to the health and wellbeing of our team members, customers, the communities we work in, and the world we live in. DYC opposes slavery in all its forms. DYC recognise that the decisions we make within our company and how we choose to provide our experiences to customers can impact the livelihoods of people and communities in which we operate.

At DYC We understand the importance of responsible procurement and ensuring that environmental, social and ethical considerations are taken into account when making procurement decisions and as such, we endeavour to interact with suppliers that also share that common understanding.

We are committed to using our influence as an industry leader to learn, share, action and promote activities that support the principles of eradicating modern slavery including those contained in the Modern Slavery Act 2018 (Cth) and the UN Declaration on Human Rights.

At DYC we proudly share our expectation that our staff and our supply base must also embrace the same high ethical standards. We continue to invest in the capability, processes and partnerships required to implement best practices in the detection, investigation and mitigation of risks in our operations and supply chain.

Our passionate approach to the eradication of modern slavery and ethical sourcing from all supply chains includes:

- the continual review and refresh of our sourcing, contracting and supplier selection processes
- The active communication of our expectations to all our suppliers and staff.

As market leaders in our industry, we are completely aligned with the intentions behind and are committed to complying with the Modern Slavery Act 2018 (Cth) .

As far as practicable, suppliers must be:

- (i) encouraged to exceed the Minimum Standards, and promote best practice and continuous improvement;
- (ii) and (ii) monitored for compliance with the Minimum Standards through supplier assessment processes as appropriate for the division/business unit, taking into account all relevant risk factors such as country risk and product risk.

Forced Labour

DYC or suppliers shall not use any type of forced labour (any work or service which work has not been freely chosen by the person), bonded labour (work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange) or indentured labour (in which an employer forbids workers from leaving employment at the worker's discretion).

DYC and its supply chain will respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment.

DYC will ensure suppliers workers are free to leave their employer after reasonable notice.

No child labour

Suppliers shall comply with the minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (ILO) Convention 138. Suppliers must be able to verify the age of all employees to ensure compliance. Suppliers must accept the principles of remediation of child and under age workers, and where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.

Wages, benefits, and transparent record keeping

Suppliers must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits. Record keeping must be accurate and transparent. Workers must be 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 shall not occur without the express permission of the worker concerned. All disciplinary measures should be recorded.

Working hours

Working hours must comply with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable ILO convention. Overtime shall be agreed, shall not be excessive, shall not be requested on a regular basis and shall be compensated as prescribed by applicable local laws.

No discrimination

All conditions of employment must be 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. Suppliers must ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.

No harassment or abuse

Workers shall be treated with dignity and respect. In particular, suppliers will provide a workplace free from harassment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment. Suppliers shall respect the rights of workers to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country of operation. Workers should have the right to join or form trade unions of their choosing.

Working conditions

Suppliers shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied and workers trained in their use. Workers will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation. Workers have the right to refuse work that is unsafe.

No bribery

Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise. Suppliers shall keep accurate records of all payments made and received in cash or in kind, for audit purposes.

Sub-contracting

Where sub-contracting is permitted, suppliers must have adequate processes in place for properly managing sub-contracting to ensure that subcontractors operate in accordance with this and any applicable divisional/business unit policy and is undertaken strictly in accordance with the contract.

Environmental compliance

Suppliers shall comply with relevant local and national environmental protection laws and will as far as practical comply with international environmental protection standards.

Animal welfare

Suppliers must ensure animals are treated humanely and with respect.

Migrant workers

Migrant workers shall have the same entitlements as local workers as stipulated by local law. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer. The employer must not require the worker to surrender identification documents. Workers employed through a third party agent or contractors are the responsibility of the suppliers, and are thus covered by these Minimum Standards.

Hiring and regular employment

Suppliers must provide each worker with a clear, understandable labour contract containing all legally required employment terms, entitlements and conditions. In addition, where possible, suppliers should work towards providing permanent employment for workers and avoid labour-only contracting arrangements, consecutive short-term contracts, excessive piece-work or false apprenticeship schemes to avoid obligations of regular employment to workers.

Accountability for modern slavery issues

DYC acknowledge that they are accountable for addressing modern slavery issues in operations and supplier contracts and will nominate a specified individual or role to be responsible for co-ordinating management of this risk. DYC must perform due diligence on new suppliers to determine their risk level and control procedures in relation to ethical sourcing and modern slavery as appropriate for its business.

DYC reserves the right to update this Modern Slavery policy at any time without notice, in order to address changed circumstances or legislation or improve Modern Slavery practices. You may obtain a copy of the current version of the Modern Slavery policy by contacting DYC.