



# **MODERN SLAVERY POLICY**

**Webcentral Group Limited**  
ACN 073 716 793

Approved 26 May 2021

## 1. PURPOSE AND APPLICATION

### 1.1 Purpose

The purpose of this policy is to assist Webcentral Group Limited and other entities in the Webcentral Corporate Group (**Webcentral** or **we**) to comply with the *Modern Slavery Act 2018 (NSW)*, the *Modern Slavery Act 2018 (Cth)* and other legislation applying to modern slavery (**Australian Modern Slavery Legislation**). This policy is operative regardless of whether Australian Modern Slavery Legislation applies to Webcentral.

### 1.2 Application

The policy sets out Webcentral's expectations for its employees, workers, contractors, suppliers, distributors and other business partners regarding modern slavery. It also sets out measures taken by Webcentral to address modern slavery in its business and supply chains

## 2. POLICY STATEMENT

2.1 Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether adults or children, 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. We are 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.

2.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under Australian Modern Slavery Legislation. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude or debt bondage, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 3. RESPONSIBILITY FOR THE POLICY

3.1 The Board of Directors of Webcentral has overall responsibility for ensuring this policy facilitates compliance with our legal and ethical obligations, and that all those under our control comply with it. The Board of Directors of Webcentral is also responsible for approving our annual modern slavery statement (if required by Australian Modern Slavery Legislation) and

ensuring that it complies with our disclosure obligations under Australian Modern Slavery Legislation.

- 3.2 The Board of Directors of Webcentral has delegated to the Company Secretary (and if there is more than one Company Secretary to them jointly) (herein referred to as the **Compliance Manager**) primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it. The Compliance Manager's responsibilities extend to:
- (a) monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in our operations under Australian Modern Slavery Legislation, including in our subsidiary entities;
  - (b) monitoring and consulting with our suppliers, contractors and business partners to identify risks of modern slavery practices in our supply chains;
  - (c) developing measures to assess and address any risks of modern slavery practices, including through due diligence in our contractual relations;
  - (d) monitoring the effectiveness of those measures;
  - (e) developing appropriate training materials and programs for our employees to comply with this policy; and
  - (f) if required, preparing our annual modern slavery statement in accordance with our disclosure obligations under Australian Modern Slavery Legislation.
- 3.3 Management at all levels 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, including any areas of our business and supply chains which are identified as at risk of modern slavery practices.
- 3.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Manager.

#### 4. COMPLIANCE WITH THE POLICY

- 4.1 You must ensure that you read, understand and comply with this policy.
- 4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3 You must notify the Compliance Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

- 4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must the Compliance Manager or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.
- 4.6 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 it with the Compliance Manager.
- 4.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Manager immediately.

## **5. COMMUNICATION AND AWARENESS OF THIS POLICY**

- 5.1 We will provide regular training to all our employees on this policy. This will include training on how to identify modern slavery practices and the particular parts of our business and supply chains which are subject to a greater risk of modern slavery practices. This training will also form part of the induction process for all individuals who work for us, whether as an employee or a contractor.
- 5.2 Our commitment to addressing the issue of modern slavery in our business and supply chains will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **6. CUSTOMERS AND SUPPLIERS**

- 6.1 Our agreements with customers will contain warranties that we comply with this policy.
- 6.2 Our agreements with suppliers will contain warranties that the supplier complies with a policy equivalent to this policy.

## **7. BREACHES OF THIS POLICY**

- 7.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 7.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

**Adopted** by the Board of Directors of Webcentral Group Limited on 26 May 2021

<b>DOCUMENT VERSION HISTORY</b>		
<b>Version number</b>	<b>Date approved and effective from</b>	<b>Person responsible for approval</b>
1	26 May 2021	Company Secretary