

PO1.11 Modern Slavery Policy

Effective date:	1 September 2023
Policy owner:	General Counsel
Applies to:	All employees

1. Purpose

This Modern Slavery Policy (**Policy**) sets out Claim Central Consolidated's (including all of its wholly owned subsidiaries) (**Company**), commitment to respecting human rights and addressing modern slavery, and how the Company approaches the risk of modern slavery in its operations and supply chain.

2. Scope

This Policy applies to the entirety of the Company, and to all employees, directors, Board members, contractors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners of the Company.

This Policy does not form part of any contract of employment and the Company may amend it at any time.

3. Policy

3.1 What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. Modern Slavery can exist in different forms, such as servitude, forced or compulsory labour or human trafficking. It can involve adults or children. Modern Slavery involves a person being deprived of their liberty, and exploited for personal or commercial gain, by another person.

3.2 Zero tolerance

The Company has a zero-tolerance approach to Modern Slavery, and is committed to:

- (a) acting ethically and with integrity in all our business dealings and relationships; and
- (b) implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place in our own operations or in any of our supply chains.

3.3 Steps to prevent Modern Slavery

The Company is committed to complying effectively with its disclosure obligations under applicable legislation including the *Modern Slavery Act 2018* (Cth) in Australia.

Further, the Company is taking steps towards identifying, assessing, and reducing the risk that its supply chain may include the use of forced, compulsory or trafficked labour. These steps include:

- introduction of training to raise awareness.
- reviewing and implementing internal processes and procedures intended to detect and reduce the risk of Modern Slavery.
- reviewing the basis on which we engage suppliers and contractors to reduce the risk of Modern Slavery.

3.4 Role of suppliers of goods and services to the Company

The Company expects all its contractors, suppliers and other business partners to be taking steps to assess and address the risk of Modern Slavery in their operations and supply chains, and that they will also hold their own suppliers to the same requirement.

To this end, we have embedded expectations on the Company's suppliers in the Supplier Code of Conduct.

3.5 Responsibility for Modern Slavery

- (a) The Company's Board is responsible for approving the Company's annual Modern Slavery Statement under the *Modern Slavery Act 2018* (Cth).
- (b) The Executive Team have primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness and dealing with any queries.
- (c) The General Counsel and Company Secretary has overall responsibility for ensuring the Company complies with its legal and ethical obligations in relation to Modern Slavery, and that there is compliance with this Policy.
- (d) All business unit heads and managers are responsible for ensuring those reporting to them understand and comply with this Policy. For any areas of our business and supply chains which are identified as at risk of Modern Slavery practices, they are also responsible for ensuring appropriate training is provided to relevant employees.

3.6 Compliance with this Policy

- (a) The prevention, detection and reporting of Modern Slavery in any part of the Company's business or supply chains is the responsibility of all employees and those who work for the Company.
- (b) Each person is required to:
 - read and comply with this Policy.
 - avoid any activity that might breach or give rise to a breach of this Policy.
 - comply with all processes and procedures to detect Modern Slavery that are put in place or notified to them by the Company.
 - keep a record or copy of any communications, documents or other information that give rise to a suspicion of Modern Slavery in the Company's business or supply chains.
 - notify the General Counsel or any other member of the Executive Team, if they become aware, believe or suspect that there may be Modern Slavery in any part of the Company's business or supply chains, or if a breach of this Policy has occurred.

- (c) Everyone is encouraged to raise any issues, concerns, suspicions or questions about Modern Slavery at the earliest possible opportunity.
- (d) Everyone is also encouraged to consider Modern Slavery risk when preparing or assessing any new business plan, proposal, strategy or process

3.7 Communication and awareness of this Policy

- (a) This Policy will be made available to all persons working for the Company (including all its wholly owned subsidiaries) via the Company’s intranet.
- (b) The Company will provide training to relevant employees on Modern Slavery. This will include training on how to identify Modern Slavery practices.
- (c) The Company’s zero-tolerance approach and commitment to addressing the issue of Modern Slavery in its business and supply chains will be communicated to suppliers, contractors and business partners at the outset of our business relationship with them, through contractual terms and a Supplier Code of Conduct.

3.8 Monitoring and enforcement

- (a) The Company may terminate its relationship with any individual or organisation working on the Company’s behalf, or providing goods and services to the Company if they breach this Policy.
- (b) Any employee found to be breaching this Policy may be subject to disciplinary action, up to and including termination of employment.

4. Related legislation

- *Modern Slavery Act 2018* (Cth)

5. Related documents

- Annual Modern Slavery Statement

Version control

Policy category	Corporate Risk & Governance				
Review date	1 September 2026				
Version control changes					
Version	Authored by	Approved by	Description of changes	Date approved	Effective date
2.0	General Counsel	General Counsel	Updated to new policy format, minor edits and changed policy name	26 August 2023	1 September 2023