



Modern Slavery Policy

Last Updated 24/07/2023

Modern slavery is a serious violation of an individual's dignity and human rights. Exploitative practices, including human trafficking. Slavery, servitude, forced labour, debt bondage and forced marriage, are all considered modern slavery and are serious crimes under Australian laws. Warsash Scientific have a zero-tolerance approach to modern slavery and we are committed to acting in a responsible and ethical manner, 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. We are committed to protect the rights of all people, including children. We are against child labour and do not hire workers unless they prove they have reached the legal age for working. The principle applies to all our external consultants, contractors, suppliers and their supply chains, third-party representatives, and business partners.

1. We prohibit recruitment through modern slavery. Any recruitment agency if we use will be required to comply with local labour laws of the country in which the recruiting takes place.
2. We do not employ or hire low skilled foreign or migrant workers directly or through recruiters.
3. We will never get involved in forced labour or exercise powers of ownership over a person by withholding their identity or immigration documents.
4. We comply with National Employment Standards and do not pay less than applicable minimum wages to an employee.
5. Document checks are performed (including proof of age documents) on all workers before offering them the job to ensure they are allowed to work according to legal standards and applicable organisation policies.
6. We do not charge workers or potential workers recruitment fees.

Definitions¹

- Servitude

The Criminal Code criminalizes servitude, which is defined in subsection 270.4(1) as the condition of a person who provides labour or services and who, because of the use of coercion, threat or deception, would not consider himself or herself to be: (a) free to cease providing labour or services, or (b) free to leave the place where the person provides labour or services, and who (c) is significantly deprived of his or her personal freedom.

- Forced Labor

Subsection 270.6(1) of the Criminal Code defines forced labor as the condition of a person who provides labour services and who, because of the use of coercion, threat or deception, would not consider himself or herself to be free: (a) free to cease providing labour or services, or (b) free to leave the place where the person provides labour or services.

- Debt Bondage

Debt bondage is defined in the Criminal Code as occurring when a person pledges his or her services or the services of another person as security for a debt if the reasonable value of those services is not applied to repay the debt or if the length and nature of the services is not defined. The penalties for slavery and trafficking offences include up to 25 years imprisonment. The penalty for debt bondage includes up to seven years imprisonment.

- Human trafficking

Division 271 of the Criminal Code criminalises human trafficking into, from, or within Australia, and contains specific offences for domestic trafficking, child trafficking and organ trafficking. It is an offence under the Migration Act 1958 to employ a person, or refer a person for work, in contravention of their visa conditions. The Act covers aggravated offences where a person is being exploited (as defined in the Criminal Code).

Compliance with the Policy

- The management have the responsibility for ensuring the compliance with legal and ethical obligation.
- The management are responsible to ensure that employees understand and comply with the policy.
- All employees, contractors, consultants, and relevant personnel must read, understand and comply with the policy.
- It's the responsibility for all those working for us to avoid any activity that might lead to (or suggest) a breach of this policy.
- You are encouraged to report to the Management as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 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.
- We 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 our supplier chain.

Breach of this Policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with consultants, contractors or any other personnel/organisation that's working on our behalf if they breach this policy.

Reference:

1. Attorney-General's Department – Right to freedom from slavery and forced labour
[Right to freedom from slavery and forced labour | Attorney-General's Department \(ag.gov.au\)](#)