

Modern Slavery Policy



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Risks of Modern Slavery Practices

Modern slavery is defined as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services. Allectum has a zero-tolerance approach to modern slavery. We are committed to mitigating the risk of modern slavery occurring within our business or supply chain.

Allectum restricts the supply of services to the countries our branches are located in. Allectum believes that in supplying such contracting services, it is compliant with all relevant legislative requirements in those countries it operates in, including Australia, and puts into practice its own associated policies. We have assessed our direct workforce as being of low risk to modern slavery, and believe our people and policies further mitigate this risk. Accordingly, we consider that our greatest risk of involvement in modern slavery is being indirectly linked to it through our supplier relationships. The following indicators were the primary source used to identify and assess potential supplier risk: sector and industry risk; product and services risk; geographic risk; and entity risk.

Within Allectum's supply chains, the following key areas were identified for potential modern slavery and human trafficking risks: office cleaning; IT hardware, print and promotional goods and services.

Actions to Assess and Address Modern Slavery Risks

The Allectum approach to assessing and addressing modern slavery risks in our operations and supply chains is based on key three principles:

1. Build meaningful relationships with partners – this includes partnership up and down the supply chain.
 - a. In particular this includes:
 - a. Providing awareness of modern slavery through engagement
 - b. Communicating our expectations through clear open discussion and agreements
 - c. Recognising and responding to the potential for inappropriate practices through questioning
 - d. Providing timely and accurate information on supply practices, and any actions being undertaken to mitigate modern slavery risks.
2. Adopt a risk management approach, both internally and with our suppliers to identify high-risk areas where modern slavery could be present and evaluate and monitor these risks.
3. Recognise the leverage we have to influence change. Consider how our own business practices could influence and contribute towards inappropriate practices, such as where supplier prices are unusually low.

During the reporting period, Allectum included clauses in our standard contractor and commercial contracts to address Workplace Health & Safety, Rates of Pay, Conditions of Worksites and related Work Rights and other statutory regulations (e.g. discrimination). Further, Allectum includes anti-modern slavery clauses in our standard contractor contracts.



Governance

In addition, the following Allectum policies help mitigate the risks across our operations and supply chains, with respect to modern slavery:

1. Anti-Bribery & Anti-Corruption Policy
2. Bullying & Harassment Policy
3. Code of Conduct
4. Equal Employment Opportunity & Anti-Discrimination
5. Risk Management Policy
6. Work, Health & Safety Policy Statement
7. Whistleblowing Policy

All Allectum employees are required to comply with the above policies and Code of Conduct.

Our Code of Conduct affirms Allectum's belief in responsible, social and ethical behaviour from all employees and clarifies the standards of behaviour that we expect from all employees. Breaches of our policies or Code of Conduct may be regarded as misconduct, which can lead to disciplinary action including termination of employment or engagement.

Remediation – Grievances and Complaints

Allectum has a Whistleblowing Policy that allows employees, directors and contractors of Allectum to raise concerns in a confidential manner. Individuals may report suspected instances of modern slavery through this Program. Monitoring the effectiveness of our actions As mentioned, Allectum's primary function is to provide professional services to address clients which at times will include white-collar contract workers. In working with our clients, Allectum strives to ensure a contractor supply that mitigates risks associated with modern slavery. Some examples of the actions taken by Allectum to monitor the effectiveness of our actions, during the reporting period, include: Where reasonably practicable, inspecting client sites to complete Work Health and Safety assessments. This ensures the working conditions of our clients meet the standard expected under statutory requirements. Where any working conditions are assessed as being substandard, Allectum engages with the stakeholder to ensure appropriate measures are taken to mitigate any risks that can be associated to modern slavery. This may involve educating the relevant stakeholder of the issue that may need to be rectified. Monitoring compliance with our standard contractor and commercial contracts. Continual engagement with contractors and clients to assist with promoting a continuous and positive dialogue with both contractors and clients. Ensuring statutory working rights are checked for each onboarded contractor. Education of internal and external stakeholders regarding risks and potential consequences around working conditions that could potentially lead to an allegation of modern slavery. Offering of a third party confidential Employee Assistance Program ("EAP") to Allectum staff and contractors. Whilst each EAP connection with an individual is highly confidential, Allectum can obtain very broad data on categories that will help to identify shortfalls in working conditions. Investigating, and considering any trends in, modern slavery related instances reported through grievance mechanisms.

Labour-Hire License

Allectum holds a labour-hire license in the ACT ([License #: 00000043](#)). The objectives of the WorkSafe ACT labour-hire licensing scheme are to, broadly protect workers from exploitation by labour-hire providers and their clients (hosts), to improve the transparency and integrity of the labour-hire industry, while promoting responsible practices in the industry. Licence holders are required to meet strict fit & proper person and compliance tests as well as regular reporting requirements.

Stakeholder Consultation

Prior to being put to the management team for approval, this policy has been reviewed by relevant subject matter experts within the business.

This policy was approved by the Directors of Allectum on 27 Jan 2022