Modern Slavery Policy

1 Purpose

This policy sets out Access Group Solutions commitment to:

(a) Promoting a whole-of-community approach to addressing Modern Slavery.

(b) Complying with all applicable laws and regulations relating to Modern Slavery in its Operations and Supply Chains, including the Modern Slavery Act.

(c) Supporting Modern Slavery survivors and proactively working to understand their lived experience to inform how Australian Red Cross addresses modern slavery.

2 Scope and Audience

This Policy:

(a) Applies to Access Group Solutions and related businesses and service providers.

3 Policy

3.1 Access Group Solutions Commitments

Access Group Solutions is committed to:

(a) Promoting a whole-of-community approach to prevent Modern Slavery based on the evidence and experience of delivering the Support for Trafficked People Program.

(b) Complying with all applicable laws and regulations relating to Modern Slavery, including the *Modern Slavery Act*.

(c) Raising awareness of Modern Slavery amongst Group Solutions people, related businesses, Suppliers and Partners.

(d) Investigating, mitigating, and remediating any incidents, near misses or concerns of Modern Slavery in its Operations and Supply Chains in a timely manner and referring any people impacted to appropriate support.

(e) Engaging with Suppliers and Partners that:

(i) Comply with applicable laws and regulations on Modern Slavery.

(ii) Adopt a proactive approach to identifying and addressing Modern Slavery in their Operations and Supply Chains.

(iii) Investigate, mitigate, and remediate any incidents, near misses or concerns of Modern Slavery in their Operations and Supply Chains in a timely manner.

3.2 Obligations of Access Group Solutions People

All Access Group Solutions People must:

(a) Ensure Access Group Solutions complies with all applicable laws and regulations relating to Modern Slavery in any jurisdiction where Access Group Solutions operates, including the Modern Slavery Act.

(b) Comply with all policies and procedures in relation to engaging with Suppliers and Partners and

(c) Undertake Modern Slavery training as determined by Access Group Solutions.

(d) Identify, address and report any Modern Slavery incidents, near misses or material risks within Operations and Supply Chains in a timely manner.

3.3 Obligations of Suppliers and Partners

(a) All Suppliers and Partners must:

(i) Ensure they comply with all applicable laws and regulations relating to Modern Slavery (including the Modern Slavery Act) in any jurisdiction where they operate.

(ii) Use best endeavours to ensure there is no demonstrated Modern Slavery in their supply chains and operations.

(iii) Engage in due diligence (including completing risk assessments and correcting actions) and training on Modern Slavery if reasonably requested by Access Group Solutions.

(iv) Have a process in place to enable Workers in their operations and supply chains to raise concerns about their work conditions.

(v) Notify Access Group Solutions within 5 business days' of becoming aware of any material risk of Modern Slavery in their Operations or Supply Chains.

(vi) Use best endeavours to address any material risk of Modern Slavery identified and to prevent the recurrence of the conditions or circumstances which gave rise to the material risk in an effective and timely manner.

(b) All Suppliers must acknowledge and comply with the principles set out in the Supplier Code of Conduct.

3.4 Breaches of this policy

(a) Any breaches of this policy may lead to disciplinary action. Depending on the severity of the breach, such disciplinary action against:

(i) Access Group Solutions People may include reprimand, formal warning, demotion, stand down, suspension, or termination.

(ii) Suppliers, partners, or other parties may include suspension, or termination, including of any agreement.

(b) Breaches of applicable laws or regulations may also result in prosecution by the appropriate authorities.

4 Related Documents

(a) Procurement Policy, and procedures.

(b) Supplier Code of Conduct.

(c) Whistleblower Policy.

4.1 Related legislation / standards

(a) *Modern Slavery Act 2018* (Cth)