

## MODERN SLAVERY

### Purpose

- (a) To ensure that the goods and services purchased through the Nature Parks supply and value chains and in connection with the Nature Parks are ethical and minimise or eradicate Modern Slavery risks; and
- (b) To set out the responsibilities of the Nature Parks, its employees, suppliers, business partners and development partners in observing and upholding the Nature Parks position on Modern Slavery, including meeting the Nature Parks obligations under the Modern Slavery Act 2018 (Cth).

### Scope

- (a) Nature Parks employees and contractors engaged and undertaking work on behalf of Nature Parks wherever they may be located (referred to as personnel);
- (b) Nature Parks operations, activities and all dealings with third parties whether they be with public sector entities, private organisations, individuals or any representatives of such persons.
- (c) Suppliers, business partners and development partners when supplying goods and services, working on projects or otherwise engaging with Nature Parks.

### Definitions

For this purpose, Modern Slavery is defined in accordance with the definitions provided in the Modern Slavery Act 2018 (Cth), that is, including:

- (a) slavery (the condition of a victim over whom any or all of the powers attaching to the right of ownership are exercised, including where such a condition results from a debt or contract made by the victim);
- (b) servitude (the condition of a victim who provides labour or services including sexual services and because of the use of coercion, threat or deception, they are not free to stop working or leave their place of work and are significantly deprived of personal freedom);
- (c) forced labour (the condition of a victim who provides labour or services and because of the use of coercion, threat or deception, they are not free to stop working or leave their place of work);
- (d) deceptive recruiting (the condition of a victim being deceived about whether they will be exploited through a form of modern slavery);
- (e) forced marriage (where coercion, threats or deception are used or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony which causes the victim to marry without their free or full consent);
- (f) debt bondage (the condition of a victim's services being pledged as security for a debt, the debt is manifestly excessive, the reasonable value of the victim's services are not used to liquidate the debt, or the length and nature of the victim's services are not limited and defined);
- (g) trafficking in persons (the recruitment, transportation, transfer, harbouring or receipt of persons, by means of coercion, threat or deception, for exploitation through modern slavery);
- (h) the worst forms of child labour including:
  - (i) where children are exploited through slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage, serfdom and forced or compulsory labour;
  - (ii) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
  - (iii) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs;

- (iv) children are engaged in work which is likely to harm their "health, safety or morals"; and
- (v) offences relating to use of children for production of child abuse material and to the production, dissemination or possession of child abuse material.

## Requirements

Nature Parks requires that we comply with all Modern Slavery laws, within our operations and supply chains, endeavouring to ensure:

- (a) employment is freely chosen;
- (b) child labour is not used;
- (c) a living wage is paid to all individuals;
- (d) individuals are not required to work excessive hours; and
- (e) any actions taken in the response to any instances of modern slavery are in the best interests of the suspected victim or victims.

Nature Parks commits to working with our suppliers, business partners and development partners to implement these requirements and comply with the following requirements relating to the risks of Modern Slavery:

- (a) Suppliers, business partners and development partners must not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it must be 15 years of age. Workers under the age of 18 must only perform work in accordance with legal requirements (e.g. with regards to working time, wages and working conditions) and subject to any requirement regarding education or training;
- (b) Suppliers, business partners and development partners must not use any form of forced, bonded or involuntary labour. All labour must be voluntary. Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents). Workers must not be required to pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period. The supplier, business partner or development partner must be responsible for payment of all fees and expenses (e.g. licences and levies) relating to workers, where legally required;
- (c) Punishment and/or mental or physical coercion are prohibited. Disciplinary policies and procedures must be clearly defined and communicated to workers;
- (d) Suppliers, business partners development partners must comply with all applicable national laws and mandatory industry standards regarding working hours, overtime, wages and benefits. Workers must be paid in a timely manner and the basis on which workers are being paid must be clearly conveyed to them;
- (e) Deductions from wages as a disciplinary measure must not be allowed, if not legally permitted and even where legally permitted, should be minimised;
- (f) Suppliers, business partners and development partners must notify Nature Parks of any breaches (including any pending charges) of any laws related to Modern Slavery or prohibited business practices.

Nature Parks expectations as set out here must be communicated to all suppliers, business partners and development partners at the outset of our business relationship with them. This document is also made available on Nature Parks public website.

Personnel who have concerns that conduct by a supplier, business partner or development partner may constitute Modern Slavery, or a breach of laws related to Modern Slavery or prohibited business practices, must contact the relevant Nature Parks employee responsible for managing the supplier, business partner or development partner.

The Contract and Procurement Officer has primary and day-to-day responsibility for implementing these requirements, and for monitoring its use and effectiveness.

Management at all levels are responsible for ensuring those reporting to them are made aware of, and understand, the requirements of this document.