



# Modern Slavery Policy

The purpose of this Modern Slavery Policy is to affirm our commitment to combating all forms of modern slavery, including human trafficking, forced labour, and exploitation within our operations and supply chains. This policy aims to:

1. **Prevent Exploitation:** Establish clear guidelines and practices to identify and mitigate risks of modern slavery in our business operations and partnerships.
2. **Promote Awareness:** Educate employees, stakeholders, and suppliers about the signs of modern slavery and the importance of ethical practices.
3. **Ensure Compliance:** Align our practices with local and international laws and standards regarding human rights and labor rights.
4. **Encourage Transparency:** Foster an open environment where concerns regarding modern slavery can be reported without fear of retaliation, ensuring accountability at all levels.
5. **Support Victims:** Provide resources and support for individuals affected by modern slavery, promoting rehabilitation and reintegration into society.

By implementing this policy, we strive to create a responsible and ethical business environment, uphold human dignity, and contribute to the global effort against modern slavery.

This policy is applicable to:

- All full-time, part-time, and casual employees of Simmons Civil Contracting.
- Contractors, subcontractors, and service providers engaged by the company. While this policy is not part of any contract you may have with us, you are expected to comply with it.
- Labour hire personnel and any third-party labour or service providers working under the direction of Simmons Civil Contracting.

## What is modern slavery?

Modern slavery is depriving a person of freedom for commercial gain and in violation of fundamental human rights.

It describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery involves serious exploitation, not sub-standard working conditions or the underpayment of workers although this may be unlawful for other reasons.

Modern slavery can take many forms including:

- Slavery - owning a person, trading in slaves or financing slave trading (ie, human trafficking)
- Forced labour - forcing a person to work by coercion or threats (and servitude is when that person's freedom is significantly restricted)
- Debt bondage – a person works to pay off a large debt, for an unlimited time or where the value of the work is not applied to the debt

- Deceptive recruiting – a recruiter charges a fee for the job offer, confiscates identity documents, deceives a person about personal freedom or their ability to leave the job
- Child labour - not always unlawful but not tolerated by us when it involves exploiting children, depriving them of education, making them work in unsafe working environments

Modern slavery can be complex and multi-faceted and can be difficult to spot.

### **What are the indicators of modern slavery practices?**

Modern slavery indicators may include where a person:

- a) is not in possession of their own passport, ID or travel documents;
- b) is acting as though they are being instructed or coached by someone else; allows others to speak for them when spoken to directly;
- c) is dropped off and collected from work;
- d) is withdrawn or appears frightened or have physical indicators of slavery, such as injuries; unable to contact friends or family freely;
- e) has limited social interaction or contact with people outside their immediate environment; story contains obvious errors;
- f) acts with hostility or have difficulty in concentrating due to trauma; has few possessions;
- g) has little or no control over their finances or no access to a bank account, or they are being significantly overcharged for their accommodation; and
- h) is living in a very poorly maintained and overcrowded place.

These indicators are not exhaustive and do not necessarily mean there are modern slavery practices. Sometimes there may be other reasons or circumstances that indicate that something is not right.

### **Responsibilities: Simmons Civil Contracting Management**

We will endeavour to:

- a) prepare a modern slavery statement as required by Australian law;
- b) identify and address modern slavery risks in our business and supply chain; and
- c) take steps to raise your awareness of modern slavery risks, including by having this policy.

### **Responsibilities: Simmons Civil Contracting Employees and any companies working under the direction of Simmons Civil Contracting**

You must take all reasonable steps to ensure our business and supply chain is free of modern slavery practices.

However senior you are and regardless of your business relationship with us, you must pay close attention to the high-risk areas identified in our Modern Slavery Statement, particularly supply chain and outsourcing in jurisdictions without adequate safeguards.

Some areas of the business are likely to have more exposure than others, including procurement and sourcing, human resources, finance, risk, sustainability, projects, legal and leadership.

Examples of specific responsibilities include:

- a) participating in all training, including in this policy;
- b) leading by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us;
- c) remaining alert to indicators of slavery (see above);
- d) using only approved contracts which include modern slavery clauses; and
- e) obeying our instructions regarding modern slavery.

### **How to report slavery concerns**

If you have a reasonably held suspicion of modern slavery practices, discuss your concerns with Rebecca Head, Financial Controller at [bec@simmonscivil.com.au](mailto:bec@simmonscivil.com.au) or 02 9620 6100. Rebecca, who will decide a course of action and provide any further advice.

If there is immediate danger call the police — don't tackle a situation on your own as dangerous criminals can be behind modern slavery and human trafficking.

Not all victims may want to be helped and sometimes, reporting a suspected trafficking case puts the potential victim at risk, so it is important that unless there is immediate danger, you discuss your concerns first with Rebecca before taking any further action.

### **Non-Compliance with Modern Slavery Policy**

Any instance of non-compliance with this Modern Slavery Policy, including but not limited to the use of forced, bonded, or child labor, human trafficking, or exploitation in any form, will not be tolerated. Employees, contractors, suppliers, and business partners are expected to adhere strictly to the guidelines set forth in this policy. Failure to comply may result in disciplinary actions, including termination of employment or contracts, and may lead to legal consequences depending on the severity of the violation. The company is committed to taking prompt and decisive action to address any confirmed violations and will fully cooperate with law enforcement agencies in any investigations related to modern slavery.

Signed: \_\_\_\_\_



Date: 11/08/2024