



Modern Slavery Policy

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Purpose

Genuity is committed to acting ethically and with integrity in all business dealings and relationships and in alignment with the *Modern Slavery Act 2018 (Cth)*, where possible, to ensure modern slavery is not taking place in our own business or supply chain.

Policy Statement

Genuity is committed to achieving its core values, including 'Integrity Always', by ensuring that there is no modern slavery in any part of our business operations.

All employees have a responsibility to comply with this Policy and to promptly report any known or suspected violations.

Violation of this Policy is grounds for disciplinary action, up to and including termination of employment.

Definitions

For purposes of this Policy Modern Slavery means conduct which would constitute:

- trafficking in persons
- slavery
- servitude
- forced labour
- Deceptive recruiting for labour or services
- forced marriage
- debt bondage
- the worst forms of child labour.

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.

Modern slavery is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery. These practices may also escalate into modern slavery if not addressed.

Responsibilities

Responsibility	Position
- Understand and be aware of Genuity's Modern Slavery requirements, compliance obligations and controls relevant to your role. - Report actual or suspected Modern Slavery issues, incidents, breaches or failures. - Conduct business in a way to ensure compliance with obligations. Comply with Genuity policies and procedures	Employees
- Oversee implementation of this policy within business area. - Understand risks and obligations within business area and maintain appropriate controls to ensure compliance.	Managers
Within respective business areas: - Oversee adequate implementation of this policy. - Ensure compliance policies are up to date and processes in place to ensure compliance.	Senior Management Team (SMT)

Preparation of the annual Modern Slavery Statement	Procurement
Review and endorsement of the annual Modern Slavery Statement	Board

Implementation

Supply Chain Assessment

Genuity will assess modern slavery risk associated with suppliers, or prospective suppliers. Where applicable, Genuity will work with suppliers to address any Modern Slavery concerns.

Where an initial assessment indicates a supplier or prospective supplier, as having high Modern Slavery risk:

- The supplier will be referred to the Governance, Risk & Compliance Manager for a comprehensive risk assessment and remediation
- Senior Executive approval is required prior to engagement.

Escalation

Any suspected incidents of Modern Slavery must be reported to the Governance, Risk & Compliance Manager. Suspected incidents may also be reported in alignment with the Whistleblower policy.

Reporting

An annual Modern Slavery Statement will be prepared for Board endorsement

Related and Supporting Documents

- Code of Conduct
- Whistleblower Policy
- Australia Group Authorisation and Delegations
- Enterprise Risk Management Policy
- Compliance Policy

Reviewing and Maintaining this Policy

This Policy is administered by the Governance, Risk & Compliance Manager. The Policy is to be reviewed every three (3) years. Changes to the Policy must be approved in accordance with Genuity governance requirements.

Owner:	Governance, Risk & Compliance Manager	Version:	v1.1
Authorised:	27/06/2024	Review date:	27/06/2027

