



Modern Slavery Policy

1 Introduction

- 1.1 Clear Corporate Technology Pty Ltd ("**the Company**") is committed to eliminating the risks of Modern Slavery and acting ethically and with integrity in all its business dealings. This policy outlines the Company's approach to reducing the risks of Modern Slavery practices within its Supply Chain and operations.
- 1.2 The Company does not use and does not condone, child or forced labour in any of its operations and is committed to ensuring that such practices are not present in its workforce or Supply Chain.
- 1.3 The Company will only do business with Suppliers who fully comply with this policy, or those who are taking verifiable steps towards compliance and will only engage independent contractors who do the same.
- 1.4 The Company does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical or emotional punishment or abuse, or involuntary servitude.

2 Scope

- 2.1 This policy applies to all Workers of the Company, including persons working for or on behalf of, or providing services to, the Company in any capacity including consultants or third-party representatives.
- 2.2 Workers must comply with this policy at all times.

3 Definitions

- 3.1 **Modern Slavery** describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute Modern Slavery can include, but are not limited to:
 - human trafficking;
 - slavery;
 - servitude;
 - forced labour;
 - debt bondage; or
 - child labour

All forms of Modern Slavery involve the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain.

- 3.2 **Supplier** means a person who supplies goods or services to the Company (whether paid or unpaid) and any employees of the Supplier.
- 3.3 **Supply Chains** is defined as the products and services (including labour) that contribute to the Company's business. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.
- 3.4 **Workers** refer to employees, directors, officers, agency workers, independent contractors and volunteers of the Company.

4 Supply Chains

- 4.1 The Company is committed to introducing anti-slavery obligations in all supplier contracts. As part of their contractual obligations, Suppliers will agree to undertake a process so the Company can understand the Supplier's ongoing commitment to eradicating Modern Slavery within its own business and those of its own suppliers.
- 4.2 In the event that Suppliers identify a risk of Modern Slavery within their own supply chains or operations, they are to notify the Company immediately and ensure they take practical steps to address the risk.
- 4.3 The Company expects that its Suppliers, at a minimum, shall:
 - i. not use any type of forced labour, bonded labour (work which is not for compensation received by the worker, but to repay a debt), child labour (where the labour is performed by a person who is not at least the minimum legal working age in the country in question or, if no such minimum age exists in that country, in accordance with International Labour Organisation Convention 138), or indentured labour (in which an employer forbids workers from leaving employment at the worker's discretion);
 - ii. respect the freedom of their workers to leave employment at their own free will and not restrict their movement by controlling identity papers or holding money deposits;
 - iii. comply with the minimum legal working age in the jurisdiction in which they operate;
 - iv. comply with the National Employment Standards (**NES**) (if relates to employees in Australia) and minimum wage entitlements;
 - v. ensure working hours are as per the NES and overtime hours are not excessive and are compensated accordingly;
 - vi. provide a workplace for its workers free from harassment and discrimination;
 - vii. provide a safe and hygienic work environment; and
 - viii. treat migrant workers the same as local workers.

5 Company Due Diligence

- 5.1 The Company has a legal and morale obligation to eliminate Modern Slavery risks in its operations and Supply Chains.
- 5.2 The Company commits to:
- i. undertaking due diligence when engaging new Suppliers, independent contractors or any other third-party representatives by:
 - broadly assessing their supply chain to assess and evaluate risks of Modern Slavery and their control procedures in relation to ethical sourcing;
 - conducting audits or assessments where a general risk of Modern Slavery is identified; and
 - invoking sanctions when parties fail to remedy identified risks of Modern Slavery, including termination of the business relationship.
 - ii. undertaking internal due diligence by continuously reviewing its internal systems and operations to ensure risks of Modern Slavery are eliminated. An important aspect of the Company's due diligence practice is to ensure this policy is kept up to date so that the policy is aligned with industry standards and legislative requirements regarding the eradication of Modern Slavery.

6 Management Responsibility

- 6.1 Managers are required to actively pursue the goals of this policy through the following approaches:
- i. ensure all Workers understand the purpose of this policy;
 - ii. ensure adequate training in relation to this policy is provided to Workers; and
 - iii. ensure Workers are trained to identify signs of Modern Slavery within the Company and throughout its Supply Chain.

7 Workers Responsibilities

- 7.1 All Workers have a responsibility to:
- i. comply with this policy;
 - ii. monitor the working environment to ensure there are no risks of Modern Slavery;
 - iii. immediately notify the Company if Modern Slavery risks are identified; and
 - iv. seek further training to better understand the risks of Modern Slavery, if required.

8 Reporting Concerns

- 8.1 Workers who identify or suspect risks of Modern Slavery must report such concerns to Managing Director on Callum McDonald 0433831323 or callum.mcdonald@csw-it.com.au immediately.

- 8.2 The Company will then promptly review the concern and commence an investigation where necessary.
- 8.3 Workers who raise a complaint may choose to remain anonymous.
- 8.4 Workers who raise a complaint are protected from adverse action which includes actions which may cause a detriment or reprisal.

9 Continuous Improvement Approach

- 9.1 The Company is committed to applying a continuous improvement approach to how it reduces the risk of Modern Slavery practices within its Supply Chains and operations.

10 Breach of this policy

- 10.1 Any Worker who is found to have breached this policy may be subject to disciplinary action, up to and including termination of employment/services.
- 10.2 Where a Supplier is found to have breached this policy, the Company will cease its engagement with them until it is satisfied that the Supplier has become compliant with this policy.