

Ethical Sourcing and Social Responsibility Policy

Overview

PowerLink Machine (Australia) ('**PowerLink**') is committed to operating every facet of its business in an ethical and socially responsible manner.

We endeavour to operate in ways that meet, or exceed ethical, legal, commercial and public expectations. In order to address this commitment, we seek to:

- respect the rule of law,
- adopt appropriate international standards and implement management systems that strive to meet our social, economic and environmental responsibilities, and
- demonstrate to our stakeholders, through our statements and performance, that we are committed to delivery value to society at large.

This policy applies to all PowerLink employees and contractors at all sites. Powerlink also expects a culture of high ethical standards, including compliance with applicable laws from our suppliers, contractors and business partners.

In so far as this policy imposes any obligations on the Company, those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees, they are discretionary in nature and are also not intended to be contractual. The terms and conditions of employment that are intended to be contractual are set out in an employee's written employment contract.

The Company may unilaterally introduce, vary, remove or replace this policy at any time.

Background

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. There are an estimated 40.3 million victims of modern slavery globally. Women and girls are over-represented, comprising 71 per cent of victims and nearly two-thirds of modern slavery victims are in the Asia-Pacific region.

Modern Slavery is defined by the *Modern Slavery Act (Cth) 2018* to include eight types of serious exploitation, including:

- **trafficking in persons** – recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
- **slavery** – where the offender exercises powers of ownership over the victim;
- **servitude** – where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work;

- **forced labour** – where the victim is either not free to stop working or not free to leave their place of work;
- **forced marriage** – where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
- **debt bondage** – where the victim’s services are pledged as security for a debt and the debt is manifestly excessive or the victim’s services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
- **the worst form of child labour** – involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
- **deceptive recruiting for labour or services** – where the victim is deceived about whether they will be exploited through a type of modern slavery.

It can also extend to:

- entering into a commercial transaction involving a slave;
- exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading;
- conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it).

Definitions

Modern Slavery Act 2018 (Cth) being the Commonwealth legislation (the Act) enacted by the Parliament of Australia on 29 November 2018 (and may be amended from time to time)

Risks of modern slavery practices means the potential for PowerLink to cause, contribute to, or be directly linked to modern slavery through its supply chains and operations

Suppliers is defined as any organisation or person who provides us with goods or services, including their subcontractors, related entities and consultants

Supply chains is defined as the products and services (including labour) that contribute to PowerLink’s own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

Policy

PowerLink are committed to working proactively to reduce modern slavery within our supply chain and operations. It is our expectation that all organisations we engage are committed to doing the same.

Fundamental to our operation and expectations is that all parties operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed.

Accordingly, in the event that an occurrence of, or material risk of modern slavery is identified the parties are required to take practical and effective steps to address that occurrence or risk. (If a contractor identifies such an occurrence, they must notify PowerLink as soon as practicable to advise of the issue and steps taken).

1. Supply Chain

Contractual Terms

PowerLink's contractual terms require our suppliers/contractors to abide by this Policy, including compliance with all relevant laws, including but not limited to Australian modern slavery laws and those foreign modern slavery laws that apply in the location(s) in which they operate.

Suppliers/contractors are required to complete a Corporate Social Responsibility questionnaire to facilitate Powerlink's understanding of the modern slavery measures they have in place.

Powerlink will review completed questionnaires, including conducting discussions with suppliers/contractors (where appropriate) to address any potential concerns and mitigations that are in place and/or to be developed.

2. Operations

Modern Slavery Policy

PowerLink is committed to abiding by its corporate social and ethical responsibility. This policy aims to ensure that our people are aware of our commitment and that they exercise their obligations in relation to reducing the risk of modern slavery practices within our supply chain and operations as appropriate. The policy also aims to provide the range of support available if a person becomes aware that someone is at risk of or affected by modern slavery practices.

PowerLink will ensure that all current (when they undergo review) and new policies, where appropriate, identify existing modern slavery commitments that can be enhanced, or where modern slavery protections can be incorporated.

We are committed to ensuring the health, safety and wellbeing of our employees. This commitment extends to our expectation that all business partners have the same commitment to their workforce.

PowerLink will conduct bi-annual review of our suppliers/contractors corporate social responsibility by sending out a questionnaire. All new suppliers/contractors will be required to complete the questionnaire as part of the onboarding process.

Training

PowerLink will train/brief their employees on this Policy, together with distribute it to all suppliers/contractors (providing them with a contact to ask questions).

Annual briefing of the policy will be conducted to PowerLinks employees and suppliers/contractors.

Where additional training needs are identified (i.e. for those employees engaged in sourcing/onboarding suppliers/contractors) PowerLink will facilitate appropriate training. Anyone with these responsibilities who has identified training needs are requested to proactively raise this with human resources.

3. Reporting concerns of modern slavery

PowerLink is committed to providing an environment in which its employees feel free and safe to speak up when there are reasonable grounds to suspect that PowerLink's people and/or suppliers/contractors are not acting ethically or in accordance with laws and obligations.

Concerns about compliance or ethical issues or illegal or unethical activities are to be reported to the Manager.

In an emergency and if someone is in immediate danger, please call Triple Zero (000) for police assistance.

OTHER POLICIES

Employees are encouraged to read this policy in conjunction with other relevant PowerLink policies, including:

- Work Health and Safety Policy;
- Workplace Anti-Bullying & Anti-Harassment Policy;
- Equal Employment Opportunity and Anti-Discrimination Policy.

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