

## Modern slavery policy

Our organisation believes in, and upholds, the basic human right to live a life that is safe and offers freedom and opportunity. The practice of denying another human these basic rights through fear, exploitation, deceit or physical or emotional restraint for profit has no place in our modern society.

Modern slavery is a term used to cover a range of exploitative practices including human trafficking, slavery, forced labour, child labour, removal of organs and slavery-like practices. While it is easy to think that slavery is not something that occurs in our modern society, organisations can knowingly or unknowingly contribute to or support modern slavery by importing or purchasing goods or utilising services which are the result of the use of modern-day slaves.

We are committed to standing with our partners and stakeholders to contribute to the ending of modern slavery. To achieve this commitment, we will:

- never directly force a person to work under the threat of violence for no pay or compel a person to work in order to repay a debt. We will also not knowingly procure goods or services from people or organisations that engage in these or other modern slavery practices.
- ensure that we meet or exceed the legislative minimum wage and conditions set out in the *Fair Work Act*, *Fair Work Regulation*, industrial instruments and other corresponding legislation.
- provide workers with a documented employment agreement detailing their benefits and obligations.
- not employ or use labour from children under the legal working age. Where children over the legal working age and under the age of 18 are employed, this will be in accordance with the *Child Employment Act 2006* and the *Child Employment Regulation 2006*.
- provide workers with a copy of the fair work information statement which details their basic rights as an employee.
- not engage in sham-contracting, or other questionable business practices, to avoid providing workers with their legislative rights such as superannuation payments, minimum wage etc. ■ not withhold payment for services unlawfully or unreasonably.

While the *Modern Slavery Act 2018* does not directly apply to Just Focus, we will also perform our due diligence in identifying and managing the risks of modern slavery in the operations and supply chains of our organisation. Risks which are relevant to our organisation include, use of migrant labour and/or contract labour hire, as well as the purchase of cleaning equipment and consumables. To mitigate these supply chain risks, we will:

- periodically evaluate our supply chain to identify suppliers in high-risk industries or countries. Local suppliers and large suppliers in the US, Europe and other developed countries are considered to be low risk for violating slavery and human trafficking laws.
- review the [Modern Slavery Statements Register](#), or [Fair trade certification](#), to determine if relevant organisations within our supply chain are managing their responsibilities under this act.
- seeking agreement from relevant suppliers regarding the supplier’s compliance with applicable laws.
- training our staff in modern slavery requirements and risks.

Suppliers who are identified to be lacking in meeting their obligations will be removed.

