



## PURPOSE

This policy formalises the commitment of Co-operative Bulk Handling Limited (ABN 29 256 604 947) (CBH) and its subsidiaries to uphold human rights for all people, combat modern slavery in CBH's business and its supply chains and comply with its obligations under Australian legislation relating to modern slavery.

## BACKGROUND

The *Modern Slavery Act 2018 (Cth)* and the *Modern Slavery Act 2018 (NSW)* cover the definition of "modern slavery" in Australia. In essence, modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether adults or children, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

CBH is committed to:

- acting lawfully, ethically and with integrity in all its business dealings and relationships;
- implementing and enforcing effective systems and controls to seek to ensure modern slavery is not taking place anywhere in its own business or supply chains; and
- ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains.

CBH will include specific prohibitions against the use of modern slavery in its key contracts and expects that all its suppliers and contractors will hold themselves and their counterparties to the same high standards.

## SCOPE

This policy applies to all persons working for CBH or on its behalf in any capacity, including employees, officers, vendors, agents, contractors, external consultants and third-party representatives, and these people and entities are expected to read, understand and adhere to this policy.

## RESPONSIBILITY FOR THE POLICY

The CBH Board of Directors:

- endorses this policy and directs the CEO to ensure that CBH's operations are carried out in compliance with it; and
- is responsible for approving CBH's annual modern slavery statement in accordance with applicable disclosure obligations under Australian modern slavery legislation.

The Chief Executive Officer of CBH Group has delegated to the Chief Audit and Risk Officer (CARO) the primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it.

The CARO's responsibilities extend to:

- a. monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in CBH's operations, including in CBH's subsidiary organisations, under Australian modern slavery legislation and to report the same to the Audit and Risk Committee of the Board;
- b. monitoring and auditing those people dealing with CBH's suppliers and contractors work to identify risks of modern slavery practices in relevant supply chains;
- c. developing measures to assess and address any risks of modern slavery practices, including through due diligence in CBH's contractual relations and monitoring the effectiveness of those measures; and
- d. preparing (for approval by the CBH Board of Directors) CBH's annual modern slavery statement in accordance with CBH's disclosure obligations under Australian modern slavery legislation.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

### **COMPLIANCE WITH POLICY**

The prevention, detection and reporting of modern slavery in any part of CBH's business or supply chains is the responsibility of all those working for, engaged by and under the control of CBH.

All persons working for CBH or on its behalf in any capacity:

- a. are required to avoid any activity that might lead to, or suggest, a breach of this policy;
- b. are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the CBH business or supply chains at the earliest possible stage;
- c. if holding a belief or suspicion that a breach of this policy has occurred or that it may occur, must as soon as possible notify their manager and the CARO; and
- d. if unsure about whether a particular act, the treatment of workers more generally or their working conditions within any part of CBH's supply chains constitutes any of the various forms of modern slavery, should raise it with the CARO as soon as possible.

CBH aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. If you are uncomfortable raising a matter with your CBH manager or direct contact at CBH, you may raise it with the CARO or raise it under CBH's Whistleblower Policy.

### **COMMUNICATION AND AWARENESS OF THE POLICY**

CBH's commitment to addressing the issue of modern slavery in its business and supply chains will be communicated to all suppliers and contractors at the outset of CBH's business relationship with them and reinforced as appropriate thereafter. CBH will continue to raise awareness of modern slavery, ensuring that employees are made aware of the existence of this policy. In respect to areas of the business which are identified as having a higher risk of exposure to modern slavery, relevant individuals will also be provided with appropriate training in relation to identifying and managing modern slavery risks, as necessary.

## BREACHES OF THE POLICY

An employee who breaches this policy will face disciplinary action in accordance with the circumstances of the breach, the most serious consequence of which could be dismissal.

CBH staff should ensure that CBH has a right to terminate its relationship with other individuals and organisations working with or for CBH if they breach this policy or refuse to comply with this policy or an equivalent policy to the satisfaction of CBH.

## ROLES AND RESPONSIBILITIES

The following roles have responsibilities associated with the obligations of this Policy:

Role	Responsibilities
Board of Directors	<p>It is the Board's responsibility to:</p> <ul style="list-style-type: none"> <li>▪ endorse this policy and direct the CEO to ensure that CBH's operations are carried out in compliance with it; and</li> <li>▪ approve CBH's annual modern slavery statement in accordance with applicable disclosure obligations under Australian modern slavery legislation.</li> </ul> <p>The Board receives reports from the ARMC and reports on material non-compliance issues and risk issues from the CARO.</p>
Audit and Risk Committee (ARMC)	<p>The Board has empowered the ARMC to:</p> <ul style="list-style-type: none"> <li>▪ oversee, review and report to the Board on modern slavery compliance in line with the ARMC's responsibilities to review the effectiveness of systems for monitoring compliance with legislative obligations;</li> <li>▪ review CBH's draft annual modern slavery statement and recommend it for Board approval;</li> <li>▪ review the effectiveness of this policy and the associated framework in place on a biennial basis or as required; and</li> <li>▪ review any actions arising as a result of serious or material breaches or investigations under this policy.</li> </ul>
Management	<p>Any manager acquiring goods and services for the business is responsible for:</p> <ul style="list-style-type: none"> <li>▪ creating, maintaining and promoting a culture of honesty, integrity and compliance;</li> <li>▪ ensuring awareness of this policy and its content;</li> <li>▪ upholding the principles outlined within this policy;</li> <li>▪ developing and maintaining an appropriate oversight and investigation process; and</li> <li>▪ ensuring staff reporting to, and people or entities engaged by, the manager are trained on this policy and how to identify modern slavery risks.</li> </ul>
Chief Audit and Risk Officer	<p>It is the Chief Audit and Risk Officer's responsibility to:</p> <ul style="list-style-type: none"> <li>▪ draft CBH's annual modern slavery statement and present to the ARMC;</li> <li>▪ ensure adequate procedures exist to capture, manage and investigate breaches of this policy; and</li> <li>▪ inform the CEO, the ARMC and the Board of any serious or material breaches or investigations under this policy.</li> </ul>

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## REFERENCES

**Table 1: External References**

The following references are referred to in this Policy and supporting resources.

Reference
Modern Slavery Act 2018
Modern Slavery Act 2018 (NSW)

**Table 2: CBH References**

Reference	STORE ID
Fraud and Corruption Policy	<a href="#">STORE-1473931053-288</a>
The Way We Work Business Code of Conduct	<a href="#">STORE-1473931053-831</a>
Employee Management and Discipline Procedure	<a href="#">STORE-1473931053-259</a>

## COMMUNICATION

Amendments to this Policy shall be communicated to the CBH Group under the direction of the Chief Audit and Risk Officer. This policy shall be made available and communicated to all CBH employees and contractors via the CBH Intranet.

## CHANGE MANAGEMENT

Changes to this document shall be managed, reviewed and updated as described in the Document Control Content and Records Management Group Procedure.

**DOCUMENT CONTROL**

**Authorities**

<b>Approved By</b>	CBH Board	<b>Approval Date</b>	02/04/2020
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<b>Owner</b>	Chief Audit and Risk Officer	<b>Custodian</b>	Group Risk, Quality & Assurance Manager
<b>Division</b>	Legal & Risk	<b>Department</b>	Risk and Assurance

**Review History**

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Description of Revision</b>
0.1	15/11/2019	Corporate Lawyer	Draft, in development, not published
0.2	15/12/2019	Corporate Lawyer	Draft, issued for review, not published
1.0	02/04/2020	Group Risk, Quality & Assurance Manager	Approved by Board, published