

**Gloucester**

41 Tate Street Gloucester NSW 2422

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## **Modern Slavery Policy Statement (Voluntary)**

### **Introduction and Background**

The Australian Commonwealth Modern Slavery Act 2018 was introduced to address the risk of modern slavery practices in the operations and supply chains of Australian organisations. This legislation has brought about an additional level of compliance to the Australian business community, as it requires large organisations to report on the risk of modern slavery in their supply chains and operations and to implement a strategy to mitigate the risk through a mechanism of continuous improvement, transparency, and reporting. While targeting organisations with annual consolidated revenue of \$100M+, the 'Act' also impacts smaller entities who form part of the supply chain of larger organisations, which include Leveltec Engineering Pty Ltd.

Modern slavery can take many forms and comprises of forced labour, extreme forms of child labour, domestic servitude, forced marriage and human trafficking<sup>1</sup>.

According to the Global Slavery Index, there is an estimated 15,000 people working in slave-like conditions in Australia, hidden in plain sight. Modern slavery in Australia is known to exist in agriculture, horticulture, mining, and construction, as well as in hospitality, domestic services, and security. Indicators of modern slavery can include, but is not limited to low or no pay; extremely long working hours and days without a break; the forced keeping of passports; onboarding fees leading to borrowing and debt bondage; WHS issues including unsafe and unclean machinery, workspaces, air, water and lack of PPE<sup>2</sup>.

Leveltec Engineering recognises that Modern Slavery in any form is a crime and violation of human rights and has committed to act ethically and ensure modern slavery is not present in any of our own operations and supply chains. We all have a responsibility to be aware of potential risks, no matter how minor, where Employees are expected to voice their concerns and management to act upon them. Furthermore, these standards are expected to be followed by all direct suppliers, contractors, and business partners; who in turn hold their suppliers, contractors, and business partners to the same ethical standards.

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## **Leveltec Organisational Structure**

This Policy Statement applies to all the activities of Leveltec Engineering Pty Ltd. It governs all of our company operations as well as the conduct of all individuals or organisations with whom we enter into direct contracts or who we appoint to act on our behalf. We expect anyone who has, or wishes to have a business relationship with Leveltec Engineering to be familiar with our anti-slavery policy and to act in accordance with it at all times.

## **Responsibility for the anti-slavery initiatives are:**

Policies: Human Resources are responsible for developing and reviewing policies by examining current best practice, seeking legal advice as needed and adapting to the needs of the Company.

Due diligence: General Management accountable for supply chain management are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

## **Training**

To ensure that all Employees recognise risks related to modern slavery and human trafficking in our business and supply chains, all employees are required to familiarise themselves with company policies and undertake the 'Modern Slavery in public procurement' training module. This will ensure that all employees are able to recognise forms and signs of modern slavery.

## **Policies and Due Diligence**

Leveltec Engineering are committed to preventing modern slavery and human trafficking in our operations and supply chains, where this statement reaffirms our intention to conduct business in an ethical manner. The policies and terms of business outlined below define our approach to identifying modern slavery risks and the steps we will take to prevent these practises in our operations:

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We encourage all employees, customers, suppliers and other business partners to report any concerns regarding their direct operations or supply chains.

We will maintain the established framework which sets out the actions and behaviours expected of all employees when representing and working within Leveltec Engineering.

We will notify all suppliers of this Policy Statement to make suppliers aware of our initiative to prevent modern slavery and human trafficking in our operations and supply chains in the future.

We will strive to undertake due diligence when considering new key suppliers; as well as consider potential risks associated with existing suppliers within our supply chain.

This Modern Slavery Policy Statement will be regularly reviewed and updated as may be required from time to time. The Executive Leadership of Leveltec Engineering endorses this Policy Statement and is fully committed to its execution.

**Benjamin Stokes (CEO)**

1 Anti-Slavery International

2 The impact of the Modern Slavery Act on small business, Dr Stephen Morse, October 2020