



# GRID GROUP

## Modern Slavery Policy

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## Review Procedure

The Managing Director will review the policy as required. The review schedule is directed in response to organisational and/or legislative changes and requirements. The review will be undertaken in consultation with workers, company representatives and other relevant parties. All relevant persons will be made aware of changes made as a result of the review.

This policy will be reviewed if:

- there are changes in the workplace that may affect policy;
- policy is not effective;
- there are legislative changes that affect the policy;
- there is a breach of this policy;
- this policy reviewed at least annually.

## Document Control

### Distribution Record Register

Copy	Issued to	Controlled Copy		Authorised by	Recipient Signature	Issue Date
		Y	N			
1		<input type="checkbox"/>	<input type="checkbox"/>			
2		<input type="checkbox"/>	<input type="checkbox"/>			
3		<input type="checkbox"/>	<input type="checkbox"/>			
4		<input type="checkbox"/>	<input type="checkbox"/>			
5		<input type="checkbox"/>	<input type="checkbox"/>			

### Amendment Record Register

ISSUE #: 1

ISSUE DATE:

Rev. #	Date	Description of Changes	Approved By
1	17/03/2022	Implementation	Alp Duramanoglu
2	14/07/2022	Update company logos	Alp Duramanoglu
3	09/02/2023	Relevant parties	Alp Duramanoglu
4			
5			

## Regulations and Guidelines

Fair Work Act 2009

**Disclaimer:** This document contains material to assist in addressing Occupational Health and Safety management obligations. Although every effort has been made to ensure the accuracy of this information at the time of publication, it is provided as guidance only and does not provide legal advice on meeting your obligations.

## Modern Slavery Policy

### DEFINITION

Modern slavery: The severe exploitation of other people for personal or commercial gain.

"We, us, our, our company or the organisation" means Grid Group.

### BACKGROUND

Modern slavery is a terrible practice that deprives a person's liberty and dignity for another person's gain. The term describes situations where coercion, threats or deception is used to exploit victims and undermine their freedom.

Practices that constitute modern slavery can include:

- human trafficking; or
- slavery; or
- servitude; or
- forced labour; or
- debt bondage; or
- forced marriage; or and
- child labour.

It is estimated that up to 40 million people are trapped in modern slavery worldwide, including many in developed countries. *Approximately* 25 million of these people are impacted by forced labour. Women and girls are over-represented, comprising about 70 per cent of modern slavery victims, with 25 per cent of all victims being children.

Nearly two-thirds of forced labour victims can be found in the Asia-Pacific region. This makes Australian businesses highly susceptible to the risk of being involved in this wrongdoing through their operations and supply chains.

### POLICY

Grid Group respects human rights and is committed to limiting the risk of modern slavery within our supply chains and operations. We do not condone or use child or forced labour in any of our operations or premises. It will work to ensure these practices are not present in our operations or supply chain. We expect that all organisations we engage with do the same.

We declare that our workforce is voluntarily and entitled to leave the work whenever they desire. Employees are not required to post a deposit or bond, and salaries are not withheld for any reason.

We will follow all laws and regulations regarding employment practices and, if made aware of modern slavery practices in its own business or within its supply chain, will resolve the issue in line with the values expressed in this policy. It is expected that suppliers have similar values to us concerning modern slavery.

### TRAINING

All staff will undertake an awareness programme on modern slavery, which covers:

- the various forms of modern slavery and how people can be held and exploited; and
- the scope of the issue and how it affects our organisation; and
- how personnel can identify the signs of modern slavery practices; and
- responsibilities of employees should they suspect modern slavery.

### RISK ASSESSMENT

We commit to undertaking a detailed risk assessment to identify which parts of our operations and supply chains are most at risk from modern slavery.

The focus will be placed on monitoring high-risk suppliers and mitigating associated risks.

Responsibility for assessing and addressing modern slavery risks is assigned to Alp Duramanoglu who will brief the Grid Group Executive Management appropriately.

Alp Duramanoglu will engage directly with credible experts, employees and other potentially affected groups in our operations and supply chains to assess risks.

### **REPORTING RESPONSIBILITIES**

All employees are responsible for detecting, reporting, and preventing modern slavery in our own business operations and supply chain.

Employees are encouraged to raise any concerns regarding instances of possible modern slavery. If suspected or believed that a breach of this policy has occurred, contact Damian Collins / General Manager as soon as possible.

If unsure about whether a particular act or conditions represents any of the identified forms of modern. Slavery, raise concerns with your manager in the first instance or Damian Collins / General Manager.

We have a no-blame policy regarding modern slavery reporting and will support all persons raising genuine concerns in good faith. No employees will suffer detrimental treatment (e.g. dismissal or disciplinary action) due to reporting their concerns in good faith.

### **SUPPLY CHAIN – SUPPLIER CONDUCT**

We will undertake due diligence on all new suppliers during onboarding and on existing suppliers at regular intervals. Including:

- assessing the risk profile of countries based on the [Global Slavery Index](#); and
- identifying the presence of vulnerable demographic groups; and
- assessing risks in the provision of supplier services; and
- conducting an audit of suppliers, their health and safety standards, labour relations and employee contracts.

Grid Group expects all new and existing Suppliers to comply with the principles set out in this policy. We expect Suppliers to operate in compliance with the laws and regulations of their applicable jurisdiction or the supply of goods and services to our Company.

Suppliers must ensure that there are no modern slavery practices in their supply chains and operations. If Grid Group or Suppliers identify any incidence of modern slavery in their supply chains or operations, they must take all practical steps to address that occurrence or risk. Suppliers must notify Grid Group as soon as practicable of any occurrence of modern slavery in their supply chain and notify relevant authorities where appropriate.

As a condition of working with us, we require all suppliers to confirm:

- their workforce does not contain forced or compulsory labour practices; and
- their workforce is voluntarily and is entitled to leave the work whenever they desire; and
- provision of an employment contract that contains reasonable conditions and notice periods; and
- employees are not required to post a deposit/bond, and salaries are not withheld for any reasons; and
- employees to NOT required to surrender their passports or work permits as a condition of employment; and
- underage children are not used in undertaking work.

### **NON-COMPLIANCE WITH THIS POLICY**

We strive to maintain the highest standards of conduct and ethical behaviour when operating abroad and managing our supply chain. All breaches of this modern slavery policy will be taken seriously and dealt with on a case-by-case basis.

#### Employees

Breaches of this Policy by an employee may lead to disciplinary action. Serious breaches will be regarded as gross misconduct and may lead to immediate dismissal.

Suppliers

Identification of non-compliance by suppliers will be assessed on a case-by-case basis, with us working to ensure the Supplier remains compliant with this policy. Where serious breaches are identified and the Supplier cannot remain compliant with this policy, disengagement from the Supplier will occur as soon as practicable.



**Signature:**  
(Managing Director)

**Date:** 09/02/2023