



## POLICY – MODERN SLAVERY

### Document

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## PURPOSE AND SCOPE

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, 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.

DMV Consulting is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

DMV Consulting expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with its core values.

## Policy Statement

- We are committed to acting ethically and with integrity in our business dealings and relationships and are committed to preventing modern slavery in our own business and to helping prevent modern slavery in our supply chains.
- We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery. In line with the Modern Slavery Act 2018, we are outlining the steps we take to tackle modern slavery. We expect the same high standards from all our employees and suppliers.
- This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, contractors, consultants and any other third-party representative.

## Responsibility

- The Directors have overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations and that all those under our control comply with it.
- The Executive Management team have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries regarding the policy and auditing internal procedures.
- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

## Compliance

- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Any activity that might lead to, or suggest, a breach of this policy must be avoided.
- Where appropriate, the Company will engage directly with suppliers in respect of this policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.

- Employees must notify a manager (or a main point of contact at DMV Consulting, if a supplier) as soon as possible if it is believed or suspected that a breach of this policy has occurred or may occur in the future.
- All parties are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business, or supply chains or any supplier tier, at the earliest possible stage.
- If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitute any of the various forms of modern slavery, employees should raise this with a manager (or your main point of contact at DMV Consulting, if a supplier).
- DMV Consulting aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment by DMV Consulting as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- If any parties believe that they have suffered any such treatment, they should inform the Managing Director immediately.

## Communication and Awareness

- Guidance on this policy forms part of the induction process for all employees and is included in our WHS Policy and provided otherwise as necessary.
- We are committed to continuous improvement so that our processes and interventions remain effective in preventing and remediating modern slavery.

## Breaches of this Policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals and organisations working for us or on our behalf (including suppliers) if they breach this policy.

# MODERN SLAVERY POLICY – ANNEXURE

## Modern Slavery Code of Conduct

### Purpose

The purpose of this Code is to clearly articulate DMV CONSULTING's expectations and requirements for all employees, contractors and suppliers in relation to our commitment to identify and address all forms of modern slavery risks in our operations and supply chains.

### Conduct

DMV CONSULTING expects anyone working on our behalf, including contractors and suppliers at all levels of our supply chains to:

1. Ensure all work in our operations and supply chains is freely chosen, without the use of coercion, threats or deception to exploit any person or undermine their freedom;
2. Respect the freedom of movement of workers, and to not engage in physical confinement or confiscation of identity and travel documents, or taking any other action to prevent workers from terminating their employment;
3. Ensure workers in its operations and supply chains are of legal age, and to prevent any form of child labour;
4. Provide fair working conditions for employees, including adequate rest periods, sufficient leave, freedom of association and collective bargaining in accordance with relevant local laws;
5. Pay workers lawful wages, including equal pay for equal work;
6. Ensure bullying, harassment and discrimination, physical, sexual, psychological or verbal harassment or abuse is not tolerated;
7. Where migrant workers are used, ensure that they are employed on the same terms as local workers in accordance with relevant local laws and not require migrant workers to surrender identification documents;
8. Undertake risk assessments within their organisation and supply chains to ensure compliance with the Act;
9. Comply with the Act and maintain a zero tolerance approach to modern slavery practices in their organisation and supply chains, including by doing everything within their power to ensure that their subcontractors and suppliers (at any level of the contracting chain) comply with this Code.

### Raising Concerns

You must notify DMV CONSULTING as soon as possible if you believe or suspect that any modern slavery practices may be present within DMV CONSULTING's operations or supply chains.

### Compliance

DMV CONSULTING has zero tolerance to any form of modern slavery. Any person or entity who fails to comply with this policy, including by:

- directly engaging or otherwise knowingly being involved in a modern slavery practice, or
- failing to report a modern slavery practice within DMV CONSULTING's operations or supply chains that they are or ought to be aware of,

will face sanctions (including but not limited to contracts being terminated and being precluded from performing future work for DMV CONSULTING) and, in relevant cases, will be referred to the relevant authorities.

Further Information If you have any questions or would like to speak to someone at DMV CONSULTING about this Code, please do not hesitate to contact DMV CONSULTING's Managing Director, David Vincent on 02 6108 3668.