



 Placements INTERNATIONAL	POLICY PI: PD-A20	EDITION: QMS REVISION NO: 1 ISSUE DATE: 27 Nov 2023 REVISION DATE:
TITLE: MODERN SLAVERY POLICY		

1. Purpose

The purpose of this policy is to prevent modern slavery by managing and mitigating modern slavery risks within our business operations and supply chains.

This policy enables Placements International to ensure that modern slavery does not exist within our operations, business relationships and extended supply chains. This policy also provides a framework to ensure compliance with the reporting requirements of the Modern Slavery Act 2018.

2. Scope

All Placements International employees, contractors and sub-contractors must comply with this policy and ensure its core principles are implemented.

3. Policy

The term modern slavery describes situations where coercion, threats or deception are used to exploit people and undermine their dignity and freedom.

The following principles will guide the implementation of this policy within our organisation:

- Placements International will not knowingly use or contribute to modern slavery practices in any form.
- Placements International will actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chain.
- Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers in Placements International's operations or supply chain is unacceptable.
- Placements International will comply with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.
- Placements International will continue to support our suppliers and business partners to assess and address modern slavery risks and take action to improve transparency and accountability within our operations and supply chains.



4. Action to prevent and manage Modern Slavery risk

The senior leadership team has ultimate responsibility for managing modern slavery risk within the organisation, ensuring our workers are aware of this policy and are provided with training in its application and implementation.

Suppliers are expected to support our efforts to assess the levels of risk within their operations and supply chain, and to gauge their commitment and capability to manage modern slavery risks. Placements International will actively engage with suppliers to promote this policy and assist developing their capabilities to identify and manage these risks.

Business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery practices will not be tolerated and any actual or suspected activity that could breach this policy will be reported immediately.

5. What to do if slavery is suspected or discovered

Workers should report actual or potential modern slavery risks, any suspected violations of the policy or other illegal or unethical conduct immediately to their line manager. Information is confidential and there will be no retribution or retaliation for reports made in good faith.

Suppliers are also required to report suspected or actual modern slavery practices, indicators or concerns immediately without fear of retribution, retaliation or loss of business with us. Placements International commits to working with our suppliers to address issues, ensure effective remedy and implement prevention measures.

6. Non-compliance with this policy

Workers who breach this policy will face appropriate disciplinary action. This could, in the most severe circumstances include dismissal for misconduct and if warranted legal proceedings may be commenced.

Placements International retains the right to terminate its relationship with individuals, suppliers and organisations working on its behalf or engaged by it if they breach this policy.

Related Documents:

PD-A01 Code of Conduct Policy
PD-A02 Harassment Policy
PD-A10 HSE Policy
PD-A11 Fatigue Management Policy
PD-A12 Equal Employment Opportunity Policy
PD-A13 Working With Communities Policy
PD-A14 Human Rights Policy
PD-A15 Dispute Resolution Policy
PD-A21 Whistle Blower Policy & Procedure

Related Legislation or Standards:

Criminal Code Act 1995
Modern Slavery Act 2018
Fair Work Act 2009
National Employment Standards (NES)



Appendix 1: Placements International's Modern Slavery Risk Management Program – Key Elements

1. A policy which outlines our commitment to prevent and manage modern slavery within our operations, business partnerships and supply chains, being this policy.
2. Communication of this policy and related program initiatives to staff, business partners and supply chain.
3. Assessment of modern slavery risks within our operations and supply chain and the development of effective, efficient and transparent controls to manage and mitigate risks.
4. Integrating anti-slavery requirements into relevant tenders and contract terms and conditions.
5. Adopting due diligence measures for review of suppliers and business partners coupled with a requirement that they implement systems and processes to effectively manage their own modern slavery risk.
6. Raising awareness, engaging and educating staff and other key stakeholders so they take individual responsibility to identify modern slavery practices and take practical steps to prevent and manage risk.
7. Implementing a robust contact system escalation protocol and remedy pathway to ensure human rights impacts caused by our activities are effectively addressed.

Documentation

Nil

Director: Michael Machin

27th November 2023