



MODERN SLAVERY POLICY

1 Purpose

This policy outlines Ventia's commitment to reducing the risk of Modern Slavery occurring in its Operations and Supply Chain and Ventia's reporting and other legal obligations under the Australian *Modern Slavery Act 2018* (Cth).

2 Scope

This policy, and the obligations imposed by this policy, apply not only to employees of Ventia (whether permanent, fixed or temporary, and including Directors, executives, managers and supervisors), but also any Supplier or subcontractor providing Products or Services to Ventia as part of its Supply Chain.

When a member of Ventia has a controlling position in a joint venture or similar arrangement this policy will be applied for the joint venture or other arrangement. In other circumstances, Ventia will remain bound by this policy and, where practicable, it will seek to have business partners adopt this policy.

3 Principle

Ventia is committed to implementing processes for its Operations and Supply Chain that seek to mitigate the risk all forms of Modern Slavery including slavery, servitude forced marriage, forced labour, deceptive recruiting, trafficking in persons and debt bondage.

4 Compliance obligations

Ventia will conduct periodic due diligence of both its own Operations and Supply Chain with respect to potential areas of risk for Modern Slavery. Ventia will also assess material new Suppliers for potential areas of risk for Modern Slavery during onboarding.

The obligation to comply with Ventia's Code of Conduct is an important requirement of Ventia's employment contracts and all contracts with Suppliers.

Ventia encourages all potential breaches of the Code of Conduct to be reported. This reporting process extends to all Ventia employees and third parties the right to contact Ventia's Whistleblower service as a grievance mechanism and report genuinely held concerns regarding Ventia's business or its operations. All parties reporting who utilise this service are protected in accordance with Ventia's Whistleblower Protection Policy.

5 Due Diligence process

Ventia maintains a risk rating system for the review and classification of material Suppliers and the Products or Services they supply to Ventia. The risk rating process is intended to identify characteristics of Suppliers which may, in the production of Products or the provision of Services, operate in breach of Modern Slavery prohibitions and Ventia's commitment to



reducing the risk of Modern Slavery occurring in its Operations and Supply Chain.

The risk management process must be managed by the Group Compliance Officer.

6 Minimum Employment Age

Ventia prohibits the employment in its business of any child below the age at which compulsory schooling ends and in any case below the age of fifteen.

7 Breach

A breach of this Policy is a breach of the Code of Conduct and may lead to disciplinary action. This may include, in serious cases, termination of employment with Ventia or the termination of any commercial agreement or relationship in place with Ventia.

8 Definitions

Term	Meaning
Modern Slavery	The worst forms of child labour (as defined in Article 3 of the ILO Convention (Not 82)), the trafficking in persons (as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in persons, Especially Women and Children which supplements the United Nations Convention against Transnational Organised Crime) and people trafficking and sexual servitude (as defined in Sections 270 or 271 of the Commonwealth Criminal Code (Australia)).
Products or Services	Any product or services provided to Ventia by a Supplier regardless of its geographic location
Supplier	A person or organisation which supplies product or services to Ventia
Operations	An activity controlled by Ventia
Supply Chain	A system of organizations, people, activities, information, and resources involved in supplying Product or Service to Ventia
Ventia	Ventia Services Group Pty Limited and all its related bodies corporate

9 Related documents

- Code of Conduct
- Whistleblower Protection Policy
- Bribery and Corruption Policy



Owner	Group CEO		
Advisory to Owner	Group General Counsel		
Approval Authority	The Board	Approval Date	7 October 2021
