



Modern Slavery Policy

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1 Preamble

- MMX is synonymous with Micromax Pty Ltd.
- Except to the extent that a contrary intention is expressed, this policy binds MMX, staff, any form of employee, controlled entities, and any entity which is bound to follow it by the terms of an agreement with MMX.

2 Statement of Intent

This policy sets out MMX's:

- i. commitment to respecting human rights and addressing modern slavery;
- ii. principles for taking meaningful action to identify and address modern slavery;
- iii. compliance framework for meeting reporting obligations set out in the Modern Slavery Act 2018 (Cth), including preparing and publishing an annual statement on steps taken to identify and address the risks of modern slavery in its operations, supply chains and investments; and
- iv. standards of behaviour expected of all staff, affiliates, suppliers and partners.

This Policy identifies roles and responsibilities for implementing this policy.

It supports our values of respect and integrity, openness and engagement, and diversity and inclusion.

3 Scope

This policy applies to all staff, employees, affiliates, controlled entities, suppliers and partners.

4 Meaning of Modern Slavery

- (1) The term 'modern slavery' describes situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom.
- (2) Consistently with the [Modern Slavery Act](#) and divisions 270 and 271 of the [Criminal Code 1995 \(Cth\)](#), this includes:
 - (a) **trafficking in persons**, which is the recruitment, harbouring and movement of a person by means of coercion, threat, deception, fraud, and abduction for the purposes of exploitation through modern slavery. Exploitation includes:
 - i. the prostitution of others or other forms of sexual exploitation;
 - ii. forced labour or services;
 - iii. slavery or practices similar to slavery;
 - iv. servitude; or
 - v. the removal of organs;
 - (b) **slavery**, which is where the offender exercises powers of ownership over the victim including:
 - i. the power to make the person an object of purchase; and
 - ii. the power to use their labour in an unrestricted way;
 - (c) **servitude**, which is where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work;
 - (d) **forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work;
 - (e) **forced marriage**, which is where:
 - i. coercion, threats or deception are used to make a victim marry; or
 - ii. the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
 - (f) **debt bondage**, which is where the victim's services are pledged as security for a debt (owed by the victim or by another person) and:
 - i. the debt is manifestly excessive;
 - ii. the victim's services are not applied to liquidate the debt; or

iii. the length and nature of the services are not limited and defined;

(g) **deceptive recruiting for labour or services**, which is where the victim is deceived about whether they will be exploited through a type of modern slavery.

Note: Offences specified in clause (a) to (g) are criminal offences under division 270 and division 271 of the [Criminal Code 1995 \(Cth\)](#).

(3) Modern slavery can also extend to **the worst forms of child labour**, including situations where children are:

- (a) exploited through slavery or similar practices, including for sexual exploitation;
- (b) engaged in hazardous work which may harm their health or safety; or
- (c) used to produce or traffic drugs.

Note: For more detail see Article 3 of the [ILO Convention \(No. 182\) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour](#), done at Geneva on 17 June 1999 ([2007] ATS 38)

(4) The term "modern slavery" is only used to describe serious exploitation.

- (a) It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery.
- (b) These practices may escalate into modern slavery if not addressed

5 Principles

- (1) Modern slavery breaches the most fundamental freedoms and human rights of individuals. MMX rejects all forms of modern slavery and recognises that modern slavery is never acceptable in any of its forms.
- (2) MMX is committed to respecting human rights and taking meaningful action to identify and address risks within its direct control which have the potential to cause, contribute to, or directly link MMX to modern slavery.
- (3) Where modern slavery risks arise outside MMX's direct control, MMX will use its influence and leverage to engage with suppliers, partners and stakeholders to effect change in their relevant practices.
- (4) MMX is committed to taking meaningful action to prevent, mitigate and, where appropriate, remedy modern slavery risks in its operations, supply chains and investments.
- (5) Where MMX identifies potential risks of causing, contributing to, or being directly linked to a form of modern slavery, its response will be on the following principles.
 - (a) Risk based due-diligence meaning that the process of identifying and responding to modern slavery risks will reflect the applicable risk profile and operating environment, including:
 - i. activities undertaken in high risk geographies;
Note: See the [Global Slavery Index](#) for updated lists of high risk countries.
 - ii. purchasing goods or services considered at high risk of being linked to modern slavery;
 - iii. operations in high risk sectors; and
 - iv. engagement with vulnerable populations at a heightened risk of being linked to modern slavery.
 - (b) Fitness for purpose, meaning that actions taken, and due diligence requirements imposed, will adequately address modern slavery risks whilst meeting organisational needs.
 - (c) Balance, meaning that actions taken and due diligence requirements:
 - i. will be commensurate with MMX's capacity and that of its partners and suppliers to implement and monitor those actions; and
 - ii. will not act as a disincentive for partners and suppliers to engage with MMX.

- (d) Embedded in 'business as usual', meaning that actions to be taken and due diligence requirements will be included in MMX's existing operating model with clear roles and responsibilities, reporting requirements and management controls.

6 Framework for addressing modern slavery

- (1) The Management Group will when required determine a holistic Modern Slavery Framework and Plan, which will set out MMX's strategy and approach to addressing modern slavery.
- (2) MMX engaging with external suppliers and partners will.
 - (a) undertake risk-based assessments and due diligence of their supply chains, operations and investments to identify and address modern slavery risks identified in clause 4 above;
 - (b) where appropriate and as informed by their risk assessment, engage with their suppliers and partners to gain a proper understanding of the measures they have in place to identify and address modern slavery risks;
 - (c) include specific modern slavery provisions in contractual documentation with suppliers and partners, as appropriate for the engagement and based on the principles in clause 5. These include:
 - i. prohibitions on slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour;
 - ii. requirements that suppliers and partners hold their own suppliers to appropriate standards and undertake risk-based modern slavery due diligence; and
 - iii. requirements to remediate identified modern slavery risks, including engaging directly with suppliers, partners and relevant stakeholders to establish a remediation plan;
 - (d) include specific modern slavery provisions in contractual documentation with suppliers and partners, as appropriate for the engagement and based on the principles in clause 5. These include:
 - i. training for staff, affiliates and controlled entities in high risk sectors; and
 - ii. supporting staff, affiliates, controlled entities, suppliers and partners in identifying, addressing and remediating modern slavery.
- (3) Where modern slavery risks arise outside MMX's direct control, staff, affiliates and others bound by this policy will engage collaboratively with suppliers and partners to identify and implement measures which contribute to the prevention, mitigation and remediation of those risks.
- (4) Where appropriate and fitting throughout the MMX regime of documents and policies they will include MMX's commitment to respect human rights and adequately address modern slavery risks.
- (5) This Policy along with useful presentation & training material must be included within the MMX induction pack with the respective item also included in the induction checklist.
- (6) This Policy must be read and acknowledged by all existing MMX staff and employees.
- (7) The Management Group will manage and address reports of modern slavery concerns and escalate them as appropriate.

7 Standards of behaviour for all staff and affiliates

- (1) Addressing modern slavery risks is the shared responsibility of all who are bound to comply with this policy.
- (2) In performing their MMX duties and functions, the behaviour and conduct of staff and affiliates must be informed by MMX's commitment to address modern slavery. This includes:
 - (a) avoiding any activity that might lead to, or suggest, a breach of this policy or any other relevant policy;
 - (b) exercising their best professional and ethical judgement;
 - (c) carrying out their duties and functions with integrity and objectivity;
 - (d) treating concerns or issues raised about modern slavery with respect, impartiality, courtesy and sensitivity;
 - (e) when required, investigating and responding to allegations of modern slavery fairly and reasonably, with due regard to procedural fairness;
 - (f) applying the principles for addressing modern slavery set out in clause 5 above;
 - (g) reporting and appropriately escalating any issues of concern in accordance with clause 10 below.

8 Standards of behaviour for suppliers and partners

MMX expects that its suppliers and partners will:

- (a) demonstrate their commitment to identifying, assessing and addressing modern slavery in their operations and supply chains in the jurisdictions in which they operate. This includes taking measures to:
 - i. identify and mitigate modern slavery risks including slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour;
 - ii. hold their own suppliers to appropriate standards and undertake risk-based modern slavery due diligence of their own operations and supply chains; and
 - iii. evaluate the effectiveness of these actions;
- (b) work collaboratively with MMX to prevent, mitigate and, where appropriate, remedy modern slavery in their operations and supply chains including by addressing the issues identified in clause 6 above. This includes providing MMX with information required to gain a proper understanding of the measures they have in place to identify and address modern slavery risks; and
- (c) notify MMX of any suspected or actual incident of modern slavery as soon as practicable after becoming aware of it.

9 Reports and Recordkeeping

- (1) Given MMX is a small to medium sized organisation (SME) it is exempt from preparing the annual Modern Slavery Statement as this does not apply to MMX. The [Modern Slavery Act](#) requires entities based, or operating, in Australia, which have an annual consolidated revenue of more than \$100 million, to report annually on the risks of modern slavery on their operation and supply chains, and actions to address those risks.
- (2) Any modern slavery incidents or concerns raised or risks identified will be reported to and actioned by the Management Group. These will be documented and actioned by the Management Group and documented within the minutes of their regular governance meeting. This way MMX will create and maintain appropriate records of decisions made and actions taken under this policy.

10 Reporting incidents or concerns of modern slavery

- (1) All MX staff and affiliates are encouraged to report and appropriately escalate concerns about possible modern slavery in the MMX landscape to their manager at the earliest possible opportunity. These will be funnelled to the Management Group to follow through with as outlined in clause 9 above.
- (2) The Management Group will use its discretion to publish as a voluntary slavery statement through the Australian Government's Online Register for Modern Slavery Statements. This is not a mandatory requirement for MMX.
- (3) We can [Report our concerns to the Australian Federal Police](#) (AFP) and/or [register incident or concern by completing the form online](#).

11 Breach of Policy

Breach of this policy may have the following consequences:

- (a) For staff or affiliates: disciplinary action may be taken, up to and including termination of employment, engagement or affiliation; and
- (b) For suppliers or partners: breach of this policy may prejudice the relationship with MMX, and may constitute a breach of contract.

12 Definitions

affiliate	means a person appointed or engaged MMX to perform duties or functions on its behalf. An affiliate is not a employee of MMX.
high risk modern slavery	has the meaning given in the Commonwealth Modern Slavery Act Guidance for Reporting Entities . At the date of this policy, this means countries which:

geographies	<ul style="list-style-type: none"> • have not ratified international conventions relevant to modern slavery, such as: The International Convention to Suppress the Slave Trade and Slavery (1926); ILO Convention (No. 29) concerning Forced or Compulsory Labour (1930); the Supplementary Convention on the Abolition of Slavery; the Slave Trade and Practices similar to Slavery (1956); the Protocol to Suppress, Prevent and Punish Trafficking in Persons, Especially Women and Children (2000); ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (1999); • are reported by international or non-government organisations to have a high prevalence of modern slavery or labour rights violations, other human rights violations or child labour; • have inadequate protections for workers, including no or weak capacity to effectively monitor workplace standards and enforce compliance with national standards; • have law enforcement agencies reported to be hostile to workers in at-risk industries; • force parts of the population to work for development purposes, for example to assist in construction or agriculture; • are reported by international or non-government organisations to have weak rule of law, including due to corruption, conflict or political instability; • have a high prevalence of people who are vulnerable to exploitation because they are impoverished, displaced or subject to severe discrimination.
High risk sectors	<p>means sectors and industries with high modern slavery risks because of their characteristics, products and processes. These include:</p> <ul style="list-style-type: none"> • use of unskilled, temporary or seasonal labour; • use of short-term contracts and outsourcing; • use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at night-time or in remote locations, such as security or cleaning; • use of child labour in hazardous conditions, such as underground, with dangerous machinery or tools, in unhealthy environments (including where they are exposed to physical or sexual abuse), or for long hours; • recruitment strategies by suppliers, their agents or labour hire agencies target specific individuals and groups from marginalised or disadvantaged communities; or • direct engagement with children, including through orphanage tourism and other forms of 'voluntourism' (including through companies' social investment and corporate social responsibility programs).
Modern Slavery Act	means the Modern Slavery Act 2018 (Cth) , as amended from time to time.
Modern Slavery Framework & Plan	means the statement, approved by the Management Group, of the MMX's holistic approach to, and strategy for, addressing modern slavery.
Supplier	means an organisation or person who supplies MMX with goods or services, and includes their officers, directors, subcontractors, agents, related entities and consultants.
Partner	Means any organisation or person who is: <ul style="list-style-type: none"> • collaborating with MMX; or • participating in a joint venture or research initiative with, or on behalf of MMX.

Please ask management if there are any queries in relation to any of the above statements.

Quality Manager Signature



Date: 18th Jul 2022