



0003 Policy: Slavery

AIM:

Business plays an important role in respecting and promoting human rights and eradicating modern slavery.

The ***Australian Modern Slavery Act 2018*** took effect on 1 January 2019.

We recognise that modern slavery is a growing and complex problem, best tackled by collective commitment and responsibility to bring it to an end and we are committed to working with all our stakeholders to fulfil this common goal.

If the policy is breached, we will act as quickly as practicable to remedy our adverse impacts on workers, individuals or communities and we will engage directly with affected stakeholders.

The purpose of this Policy is to ensure that Sovereign Press Pty Ltd:

- is compliant with local, national, and other applicable laws and regulations in the areas in which the businesses operate.
- sources products and services in accordance with legal obligations and community expectations while working with suppliers to improve their social and environmental practices.
- act to prevent, mitigate and where appropriate, remedy modern slavery in their operations and supply chains.

CONTEXT:

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. Modern slavery can take many forms; it is a complex and multi-faceted problem and can encompass:

- Slavery: where ownership is exercised over an individual
- Servitude: involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Sovereign Press Pty Ltd commits to use these insights to contribute to ending all forms of modern slavery, both in Australia and overseas, by ensuring our own supply chains and operations don't contribute to modern slavery practices, and to take appropriate action to respond to the humanitarian impacts of modern slavery.

PROCEDURE:

Sovereign Press Pty Ltd is committed to following the outlined minimum standards:

No forced or bonded labour Employment shall be freely chosen.

Sovereign Press shall:

(a) not use any type of forced labour (any work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person), bonded labour (work, which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange) or indentured labour (in which an employer forbids workers from leaving employment at the worker's discretion)

(b) respect the freedom of movement of employees and not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment; and

(c) ensure that employees are free to leave their employer after reasonable notice.

No child labour.

Sovereign Press shall comply with the minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (ILO) Convention 138.

Wages, benefits, and transparent record keeping.

Sovereign Press must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits. Record keeping must be accurate and transparent. Employees will be provided with written and understandable information about their employment conditions before they enter employment and about their wages for each pay period. Deductions from wages for disciplinary measures or any deductions from wages not provided for by law shall not occur without the express permission of the worker concerned.

All disciplinary measures should be recorded.

Working hours

Working hours must comply with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable ILO convention. Overtime shall be agreed, shall not be excessive and shall be compensated as prescribed by applicable local laws.

No discrimination

All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation. Suppliers must ensure that

they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.

No harassment or abuse

Employees shall be treated with dignity and respect. In particular, suppliers will provide a workplace free from harassment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.

Freedom of association, grievance mechanisms and recourse

Sovereign Press shall respect the rights of workers to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country of operation. Workers should have the right to join or form trade unions of their choosing. Sovereign Press will not interfere with, obstruct or prevent legitimate related activities, such as collective bargaining. Sovereign Press has procedures in place for employee consultation and employee incident/hazard reporting.

Working conditions

Sovereign Press shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied, and workers trained in their use. Where suppliers provide accommodation it shall be clean, safe and meet the basic needs of workers. Workers will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation. Workers have the right to refuse work that is unsafe.

No bribery

Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise. Suppliers shall keep accurate records of all payments made and received in cash or in kind, for audit purposes.

Sub-contracting

Where sub-contracting is permitted, suppliers must have adequate processes in place for properly managing sub-contracting to ensure that sub-contractors operate in accordance with this and any applicable divisional/business unit policy and is undertaken strictly in accordance with the contract.



Migrant workers

Migrant workers shall have the same entitlements as local workers as stipulated by local law. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer. The employer must not require the worker to surrender identification documents. Workers employed through a third-party agent or contractors are the responsibility of the suppliers and are thus covered by these Minimum Standards.

Employee declaration:

I have received a copy of this policy, I have read it thoroughly and understood it.

Name:

Signature:.....

Date: