

Ethical Sourcing & Modern Slavery Policy

It is the policy of GQS (Global Quality Services) and its business units to be dedicated to respecting and practicing human rights and eliminating modern slavery in our global services. This policy applies to all GQS business units and employees.

Modern slavery includes the crimes of human trafficking, slavery and slavery-like practices such as servitude, forced labor, forced or servile marriage, the sale and exploitation of children, and debt bondage.

We are committed to managing our activities in accordance with applicable laws and with respect for human rights, informed by the United Nations Guiding Principles on Business and Human Rights and consistent with the Universal Declaration of Human Rights.

We expect our suppliers and subcontractors to perform their business while respecting and honoring individuals and their human rights.

GQS Policies and the Australian Modern Slavery Act 2018 provide further guidance on our efforts to conduct business responsibly and respect human rights.

'Suppliers' could be defined as factories, supplier sites and providers of goods or services to GQS and its business units.

Sub-Contractors and Suppliers could be interchangeable as this policy is written; sub-contractors are mainly approved suppliers to provide services for GQS's operations.

Should a conflict exist between this policy and local requirements, GQS leadership will use the UN Guiding Principles on Business and Human Rights as a model for decision-making and consult the Legal Representative to ensure legal requirements are met.

The purpose of this Policy is to ensure that all GQS employees and its accomplices:

- are compliant with local, national and other applicable laws and regulations in the areas in which the businesses operate;
- source 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;
- respect the rights and principles contained within the International Labour Organization Declaration on Fundamental Principles and Rights at Work, to the extent that these rights and principles are reflected in domestic laws, rules, and regulations.

Policy

- I. Each business unit must adopt policies and procedures to ensure that it is addressing modern slavery and ethical sourcing risks in its operations and supply chains in a way that is appropriate for the relevant business unit.
- II. Each business unit must, as far as practicable, include in its operational and supplier contract terms, requirements that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate.
- III. Each business unit must, as far as practicable, use in its operational and supplier contract terms requirements that suppliers:
 - comply with the Minimum Standards set out in Appendix B (Minimum Standards);
 - provide the business unit with rights of termination if the supplier is unable or unwilling to work towards full compliance with the Minimum Standards.
- IV. As far as practicable, suppliers must be:
 - encouraged to exceed the Minimum Standards, and promote best practice and continuous improvement;
 - monitored for compliance with the Minimum Standards through supplier assessment processes as appropriate for the business unit, considering all relevant risk factors such as country risk and product risk.
- V. Each business unit must monitor and review the effectiveness of the policies and procedures referred to in paragraph I above, considering their suitability, adequacy and effectiveness as per the risk assessment.
- VI. Each business unit must implement an approach to modern slavery risk management in accordance with the guidelines in Appendix A.

GQS is committed to managing security in a way that respects human rights, guided by the Voluntary Principles on Security and Human Rights.

GQS provides accessible grievance mechanisms for individuals and communities to raise human rights concerns and seek resolution. All complaints and feedback will be logged in the Action Register within IMS.

GQS shall actively engage with stakeholders, including employees, suppliers, and communities, to promote awareness and understanding of this policy. Applicable stakeholders should be advised of this policy whenever applicable.

This policy will be reviewed annually for suitability and updated as necessary.

David Cross

David Cross
Managing Director

Appendix A – Modern Slavery Risk Management For Each Business Unit

Accountability for modern slavery issues, with an identified risk owner

Business units acknowledge that they are accountable for addressing modern slavery issues in operations and supplier contracts and will nominate a specified individual or role to be responsible for co-ordinating management of this risk.

Supply chain mapping and risk assessment

Business units must assess the risks of modern slavery across their operations.

The risk assessment must initially address the modern slavery risks of tier 1 suppliers and then assess those suppliers beyond tier 1 who are determined by the business unit to be high risk.

Tier 1 suppliers are defined as those suppliers that supply goods or services directly to the business unit.

On-boarding and contracting

Once agreed upon contracting with GQS, responsible personnel must complete induction and will be given copies of applicable GQS' policies.

Subcontracting companies are given a contractual agreement with GQS which states the requirement to abide with GQS' policies.

Business units will perform due diligence on new suppliers when deemed necessary to determine their risk level and control procedures in relation to ethical sourcing and modern slavery as appropriate for its business.

The policy has to be referenced along with other GQS' company policy when considering the supplier's ethical sourcing and modern slavery performance during the supplier on-boarding.

Audit and compliance program

Business units, when deemed necessary will assess suppliers through their audit/compliance program to confirm compliance with this policy.

The business unit should involve relevant personnel or external providers trained in conducting audits when required.

Training

Business units must ensure that team members with relevant roles in relation to the policy receive adequate training on the policy and any supporting processes applicable to their role.

Complaints mechanism

All complaints and feedback will be logged in the Action Register within IMS.

All actioned items will be investigated and corrected according to Standard Operating Procedures and Legislative Law.

Remediation

Business units must be committed to working with suppliers to remediate any breaches of this policy.

Stakeholder engagement

Business units must have an approach to stakeholder engagement in place, applicable stakeholders should be advised of this policy whenever applicable.

Review

Business units must monitor and annually review the effectiveness of the risk management measures described above.

Appendix B – Minimum Standards Expected Of Supplier

No forced or bonded labour

Employment shall be freely chosen. Suppliers shall:

- 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);
- respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment;
- ensure that workers are free to leave their employer after reasonable notice.

No child labours

Suppliers 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. Suppliers must be able to verify the age of all employees to ensure compliance.

Suppliers must accept the principles of remediation of child and underage workers, and where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.

'Child labour' is defined as any work by a child or young person, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to interfere with that person's education, or to be harmful to that person's health or mental, spiritual, moral or social development.

'Child (or Children)' is defined as a person under the age of 15, or below the age at which school attendance is not compulsory under local law, whichever is older.

'Young Person' is defined as a person under the age of 18 but not classified as a child.

Principles of remediation is defined as a program enabling children and underage workers to return to quality education and establish and implement effective systems to prevent the use of child labour in the future.

Wages, benefits, and transparent record keeping

Suppliers must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits.

Record keeping must be accurate and transparent. Workers must 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, shall not be requested on a regular basis 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

Workers shall be treated with dignity and respect.

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

Suppliers shall respect the rights of workers to lawfully associate or not to associate with groups of their choosing, if such groups are legal in the country of operation.

Workers should have the right to join or form trade unions of their choosing.

Suppliers should not interfere with, obstruct or prevent legitimate related activities, such as collective bargaining. Workers can select worker representatives.

Representatives should not be discriminated against and should have regular access to company management or appropriate process in order to address grievances and other issues.

Suppliers should have a policy in place for workers to approach management on issues of concern, on their own or through worker representatives, confidentially.

Working conditions

Suppliers 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 subcontractors operate in accordance with this and any applicable divisional/business unit policy and is undertaken strictly in accordance with the contract.

This always applies to Tier 1 supplier and when only deemed necessary beyond tier 1.

Environmental compliance

Suppliers shall comply with relevant local and national environmental protection laws and will as far as practicably comply with international environmental protection standards.

Animal welfare

Suppliers must ensure animals are treated humanely and with respect.

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.

Hiring and regular employment

Suppliers must provide each worker with a clear, understandable labour contract containing all legally required employment terms, entitlements and conditions.

In addition, where possible, suppliers should work towards providing permanent employment for workers and avoid labour-only contracting arrangements, consecutive short-term contracts, excessive piece-work or false apprenticeship schemes to avoid obligations of regular employment to workers.