

GLOBAL WORKFORCE SOLUTIONS PTY LTD

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Australian Company Number (ACN): 671 808 772

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Document Title	Modern Slavery Policy
Document Code	GWS-POL-001
Document Owner	HR Department
Date	30 Sept 2023

PURPOSE

The purpose of this policy is to enforce adherence to international law and Australian legislation against modern slavery practices. Global Workforce Solutions Pty Ltd (the "Company") is committed to limiting the risk of modern slavery within our business, our supply chain, and through our business partners and clients. We seek to operate with integrity and respect for human rights in all our operations.

SCOPE

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. It extends to all our supply chains, vendors, and clients.

1. MODERN SLAVERY

Modern slavery is a term used to describe serious exploitation. It describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Modern slavery includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Global Workforce Solutions Pty Ltd is committed to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

2. COMPANY POSITION ON MODERN SLAVERY

Modern slavery is a multi-faceted crime and violates fundamental human rights. As a responsible corporate citizen, Global Workforce Solutions Pty Ltd complies with the Modern Slavery Act 2024 (Commonwealth).

While this policy may seem relevant primarily to operations in high-risk sectors, all associated parties must be vigilant. We do not tolerate any form of exploitation, forced labour, domestic servitude, or child labour. This policy assures all employees and third parties providing services to the Company that safeguards are in place.

3. COMPANY RESPONSIBILITIES

3.1 Management Responsibility

The Company's Board of Directors has overall accountability for oversight of modern slavery risks within the Company's operations and supply chains and for ensuring compliance with the Australian Modern Slavery Act 2018 (Cth). The Board is supported by senior management, who are responsible for implementing this policy and embedding it into the Company's governance, risk management, and compliance frameworks.

Senior executives and management are responsible for promoting a culture of respect, fairness, and dignity and for ensuring that all workers are treated in accordance with this policy and applicable laws. This includes ensuring that appropriate systems, controls, and resources are in place to identify, assess, and address modern slavery risks.

Supervisors and managers are accountable for ensuring that employees, contractors, and other

workers within their areas of responsibility understand and comply with this policy. Management must ensure that adequate and regular training is provided to relevant personnel, commensurate with their roles and exposure to modern slavery risks.

Management is required to monitor compliance with this policy, promptly escalate any actual or suspected modern slavery risks or incidents, and support investigations and remediation activities. Material risks, incidents, and remediation outcomes are to be reported to senior leadership and, where appropriate, to the Board to enable effective oversight, continuous improvement, and transparent reporting.

3.2 Supplier Responsibility

All suppliers must comply with the Australian Modern Slavery Act 2018 (Cth) and any other applicable laws and regulations relating to the prevention of modern slavery, including forced labour, human trafficking, debt bondage, child labour, and deceptive recruiting practices.

Suppliers are expected to take reasonable and proportionate steps to identify, assess, and address the risks of modern slavery within their own operations and supply chains. This includes implementing appropriate policies, due diligence processes, risk assessments, and remediation mechanisms consistent with the size, nature, and complexity of their operations.

Suppliers must operate in a manner that aligns with our values and ethical standards and must provide cooperation, transparency, and access to relevant information where required to support modern slavery risk assessments and compliance activities.

Any actual or suspected modern slavery risk, incident, or non-compliance must be reported promptly to Global Workforce Solutions. Upon notification, Global Workforce Solutions will conduct an independent investigation, which may include direct engagement with the supplier. Where risks are identified, suppliers are required to cooperate fully in implementing corrective and remedial actions. Failure to cooperate, remediate identified risks, or demonstrate ongoing compliance may result in corrective action, including suspension or termination of the supplier relationship.

4. MANAGING RISK OF MODERN SLAVERY

Global Workforce Solutions Pty Ltd implements the following verification procedures to manage risks, particularly in relation to recruitment and outsourcing:

4.1 Legal Entity Verification

The Company shall require all suppliers to provide proof of valid business registration (e.g., ASIC registration for Australian entities) to ensure the legality of their entity.

4.2 Certification Requirements

Where recruitment involves overseas services, the Company requires certification from relevant government bodies (e.g., POEA for Philippines-based deployments, or equivalent authorities in other jurisdictions) or consulate certification where applicable.

4.3 Due Diligence

The Company shall ensure any third-party services exposed to higher risks of modern slavery—such as trade test providers, clinics, and recruitment agencies—undergo strict vetting. Suppliers, clients, and business partners must demonstrate values aligned with the Company in relation to anti-slavery practices.

4.4 Training and Induction

Onboarding employees will be engaged in induction trainings that includes awareness against modern slavery, ensuring they can identify and report potential risks.

5. POLICY COMPLIANCE

Breach of this policy will be taken seriously and dealt with according to the due process of the Company. Global Workforce Solutions Pty Ltd has **zero tolerance** for any instance of modern slavery.

- **Employees:** Breaching this policy may result in serious disciplinary action up to and including termination of employment. This does not limit potential criminal or civil liability.
- **Partners:** Vendors, Suppliers, and Clients found to be engaging in any form of modern slavery will face immediate termination of service level agreements, partnership contracts, or any similar agreements.

6. DEFINITIONS

The following definitions provide clarity on the terms used within this policy and relevant legislation:

Term	Definition
Slavery	Exercising powers of ownership over a person, including the power to buy or sell them.
Servitude	The obligation to provide services imposed by the use of coercion, force, or deception, and where the person is not free to leave.
Forced or Compulsory Labour	Work or services exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
Human Trafficking	Arranging or facilitating the travel of another person with a view to their exploitation.
Child Labour	Work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development.
Debt Bondage	Status or condition arising from a pledge by a debtor of his or her personal services or of those of a person under his or her control as security for a debt, if the value of those services does not reasonably be applied towards the liquidation of the debt.
Deceptive Recruiting	Deceiving a person about the nature of the work, location, or freedom to leave in order to induce them to engage in labour.

7. REVISION HISTORY

Date	Changes	Prepared By
15 Sept 2025	Initial Policy Creation - Updated for Modern Slavery Act 2024	HR Department