

Australasia's largest insurance law firm

Modern Slavery Policy

W+K MODERN SLAVERY

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1. Purpose and scope

- 1.1 Wotton + Kearney Pty Ltd (ABN 94 632 932 131) ("W+K") is committed to respecting human rights and addressing modern slavery.
- 1.2 The purpose of this policy is to outline W+K's commitment to prevent, detect and report the risk of slavery or human trafficking within its operations and supply chain.
- 1.3 This policy applies to all of W+K's operations.

2. Compliance with internationally recognised standards

- 2.1 This policy is a manifestation of W+K's commitment to the following International Standards on labour rights and modern slavery:
 - (a) United Nations (UN) Guiding Principles on Business and Human Rights
 - (b) ILO Conventions 29 and 105 and Recommendation 35 (Forced and Bonded Labour)
 - (c) ILO Convention 138 and Recommendation 146 (Minimum Age)
 - (d) ILO Convention 182 and Recommendation 190 (Worst forms of Child Labour)
 - (e) ILO Convention 87 (Freedom of Association)
 - (f) ILO Convention 98 (Right to Organise and Collective Bargaining)
 - (g) ILO Conventions 100 and 111 and Recommendations 90 and 111 (Equal Remuneration for male and female workers for work of equal value, Discrimination in employment and occupation)
 - (h) ILO Convention 81 (Labour Inspection)
 - (i) ILO Convention 122 (Employment Policy)
 - (j) UN Sustainable Development Goals 8 and 12.

3. Modern slavery

- 3.1 Modern slavery is a broad concept relating to systematic abuse of fundamental human rights in contemporary workforces. It is generally accepted as encompassing eight types of serious exploitation namely: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or service and the worst forms of child labour.
- 3.2 Modern slavery breaches the most fundamental freedoms and human rights of individuals. W+K rejects all forms of modern slavery and recognises that modern slavery is never acceptable in any of its forms.

- 3.3 W+K is a reporting entity under the Modern Slavery Act 2018 (Cth) (MSA) and has resolved to take action to address modern slavery risks in its supply chains and operations.
- 3.4 We expect all employees and suppliers of W+K to comply with our modern slavery commitments.

4. W+K's operations

- 4.1 All employment within W+K is voluntary.
- 4.2 W+K does not use or condone child or forced labour in any of its operations or premises, and works to ensure these practices are not present in its workforce or supply chain.
- 4.3 W+K does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude.
- 4.4 W+K shall abide by all laws and regulations regarding pay practices including those relating to minimum wages, overtime hours and legally mandated benefits.
- 4.5 W+K shall use all reasonable endeavours to ensure that third party recruitment agencies are compliant with the provisions of this policy. Workers shall not be required to pay employers or their agents any recruitment fees to obtain their employment.

5. Risk assessment and due diligence processes

- 5.1 W+K undertakes a detailed mapping of its supply chain on an annual basis. The overall risks of modern slavery occurring in our supply chains and operations have been assessed as being relatively low. However, W+K acknowledges that modern slavery risk exists across all sectors and organisations which may mean it is directly or indirectly exposed to the risk of modern slavery.
- 5.2 W+K has developed a due diligence framework for identifying and addressing modern slavery risk in its supply chain. This framework includes:
 - (a) Mapping W+K's supply chain
 - (b) Supplier risk assessments
 - (c) Incorporating modern slavery provisions into our supplier contracts
 - (d) Our Modern Slavery Supplier Code of Conduct, which details our expectations of all suppliers to minimise and mitigate risks of modern slavery.
 - (e) Building capacity and staff awareness of modern slavery through training.
 - (f) Building awareness of modern slavery and influencing our network through pro bono work and partnerships.

6. Suppliers

- 6.1 W+K considers the ethical implications of its procurement activities and seeks to partner with suppliers that uphold the human rights of workers in their operations and supply chains and treat workers with utmost dignity and respect.
- 6.2 W+K will take reasonable steps to ensure that its suppliers are aware that they are expected to adhere to the standards expected by W+K, in accordance with our Modern Slavery Supplier Code of Conduct.

7. Communication and awareness of this policy

- 7.1 W+K will communicate this policy to its employees. Awareness of this policy by W+K employees is instrumental to mitigating the risk of modern slavery within our operations.
- 7.2 W+K will communicate this policy to key suppliers through our Supplier Code of Conduct.

8. Responsibility of staff

- 8.1 All W+K staff have a responsibility to prevent, identify and report any concerns they may have in relation to modern slavery with W+K's operations and supply chains.
- 8.2 Such concerns are to be reported to W+K's People + Culture Director or otherwise in accordance with W+K's Modern Slavery Grievance Policy.
- 8.3 All reports of concerns related to modern slavery will be treated with sensitivity, confidentiality and will be taken seriously.

9. Policy maintenance

- 9.1 This policy was initially adopted on 1 July 2022 and will be reviewed on an annual basis to ensure that it is operating effectively and to consider whether any amendments are required.
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