

Data#3

Modern Slavery Policy

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Modern Slavery Policy

Data#3 Limited ABN 31 010 545 267

1. Introduction

The purpose of this document is to:

- Provide a basic explanation of Data#3's zero-tolerance approach to Modern Slavery; and
- Describe the procedures in place at Data#3 to ensure that Data#3 complies with its stated commitments, applicable standards and legal obligations, including for the purposes of ongoing compliance under the *Modern Slavery Act 2018* (Cth) (**Act**).

This policy is part of Data#3's approach to identifying, addressing and remediating Modern Slavery risks and practices in its operations and supply chain and is a critical piece in creating a robust and effective framework for the purposes of clause 16 of the Act and in generally promoting respect for human rights in accordance with relevant international standards, including the UN Guiding Principles on Business and Human Rights.¹

2. Policy statement

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as:

- slavery,
- servitude,
- forced and compulsory labour
- human trafficking and
- any related exploitation

(together **Modern Slavery**).²

At Data#3, we have a zero-tolerance approach to Modern Slavery and are committed to acting ethically and with integrity in all our business dealings. We expect the same standards from our Providers.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are engaging in modern slavery practices. However, Data#3 accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy statement sets out Data#3's commitment to:

- ensuring there is transparency in our own business operations;
- addressing risks of Modern Slavery throughout our supply chain; and
- taking a continuous improvement approach to ensuring workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to throughout our operations and supply chain.

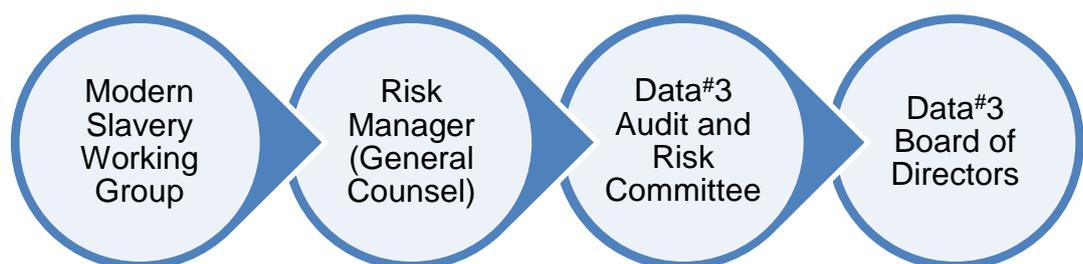
The standards we expect our Providers to adhere to are documented more fully in our Provider Code of Ethics and Conduct <https://www.data3.com/policy/>

¹ https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

² See generally the definition of **modern slavery** set out in section 4 of the *Modern Slavery Act 2018* (Cth).

3. Interested parties

- **Board of Directors** – overall responsibility for approving this policy and updates from time to time. Overall sign-off for Data#3's annual Modern Slavery Statement for the purposes of the Act.
- **Audit and Risk Committee** – oversees the approach/framework for addressing Modern Slavery risks on a periodic basis and ensuring compliance in accordance with Risk Management Policy and Data#3's Risk Appetite Statement. Oversee the approval and release of the Modern Slavery Statement for the purposes of the Act. Oversees periodic updates to this policy and the Provider Code of Ethics and Conduct: <https://www.data3.com/policy/>
- **Risk Manager (General Counsel)** – Day to day responsibility for implementing this policy.
- **Modern Slavery Working Group** – Cross functional working group responsible for developing the approach/framework for addressing Modern Slavery risks in our operations and supply chain and monitoring our internal control systems, policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery in our operations and supply chain. Working Group is chaired by Risk Manager (General Counsel) and involves functional areas of legal, supply chain operations, finance, HR.
- **Operational and Senior Management Teams** - managing risks on day-to-day basis within individual areas of responsibility. Responsible for ensuring that those reporting to them understand and comply with this policy and complete any required training.
- **Data#3 Staff** – responsible for compliance with this policy and other relevant policies (such as the Whistleblower Policy), responsible for participating in any required risk management training.
- **Third parties working with Data#3** (collectively '**Providers**' - vendors, distributors, suppliers, partners, contractors, sub-contractors) are responsible for compliance with this policy, participation in any required risk management training, participation in audit and due diligence activities as required by Data#3 from time to time, responsible for completing a Provider Application Questionnaire and acknowledging our Provider Code of Ethics and Conduct and accepting minimum requirements in their contracting process with Data#3 including specific prohibitions on the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude.



This policy applies to all individuals or entities working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, and Providers.

4. Responsibility for the Policy

The Risk Manager together with the Modern Slavery Working Group and Audit and Risk Committee will have overall responsibility for identifying Modern Slavery risks and ensuring compliance with Data#3's legal and ethical obligations and overseeing compliance with the

Data#3 Risk Management Policy and Risk Management Framework. Otherwise the roles of other interested parties are set out in paragraph 3 of this policy.

5. Compliance

The prevention, detection and reporting of modern slavery or human rights concerns in any part of Data#3's business or supply chains, whether in Australia or abroad, is the responsibility of all those working for Data#3. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you can refer to Data#3's Whistleblower Policy for next steps. You are encouraged to raise concerns about any issue or suspicion of modern slavery or human rights concerns within Data#3's operations or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your manager.

6. Training and Communication

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

Data#3's zero tolerance approach to modern slavery must be communicated to all Providers when entering into new contracts with them.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

7. Non-compliance/breach of the Policy

Data#3 will require its Providers to adhere to labor, health, safety and employment laws in the countries in which they operate and more generally comply with [Data#3 Supplier Code of Ethics and Conduct]. If we become aware any facts to suggest that one of Providers are engaging in modern slavery, we will thoroughly investigate, and where appropriate, terminate the relationship and report to the responsible national or international authorities.

8. Queries

If at any time a party to which this policy applies has questions regarding Modern Slavery, or Data#3's approach to Modern Slavery, they should contact the Risk Manager.

9. Communication

Communicated internally on StaffNet and externally to all relevant third parties as part of third-party onboarding and third party audit processes.

10. Revision

Document Revision Details		Date/Time	Revision Date
Created/Reviewed By	Risk Manager	01 January 2020	1 January 2020
Approved By	Risk Manager	31 March 2020	31 March 2020