

# MODERN SLAVERY POLICY



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## INTRODUCTION

The Commonwealth Modern Slavery Act (MS Act) was enacted in November 2018. While Woven Image is not obligated to comply with the reporting obligations of the MS Act due to its annual consolidated revenue being less than \$100 million, we support the objectives of the MS Act in promoting better business practices to eradicate modern slavery and related abuses.

Woven Image wants to set clear expectations to its employees and to its suppliers to be alert to the possible and inadvertent risk of commercial involvement in modern slavery.

Woven Image Modern Slavery Policy (Policy) is a key document that confirms our commitment to corporate social responsibility and how we will manage modern slavery risks within our supply chain.

### What is modern slavery?

'Modern slavery' means slavery as traditionally understood, where one person owns or controls another person, or engages in slave trading.

The definition of 'modern slavery' also extends to other forms of abuse such as:

- Forced labour - where a person has no choice about having to work, and cannot refuse to work or negotiate working conditions.
- Debt bondage - where a person works for an undefined or poorly defined period of time to pay off a debt, especially a debt that is excessive.
- Servitude - where a person works because of the use of coercion, threat or deception.
- Deceptive recruiting for labour or services - where a person is misled about the nature of work on offer.
- People trafficking.
- Child labour.

Each of these offences involve exploitation of a worker with a significant or absolute loss of freedom.

Even if a worker could escape from their predicament, the fact that a worker does not escape, or attempt to escape their situation, does not in any way provide a defence to the person engaging in the exploitation of the worker.

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## ROLE OF THIS POLICY

In this Policy, Woven Image outlines the framework, in which to eradicate modern slavery from within:

- Our business - recognising that best practice starts within our own business.
- Our supply chain, being our suppliers' businesses - ensuring that they uphold the highest standards whether or not they are obliged to comply with the objectives of the MS Act.

Woven Image recognises that tackling modern slavery requires a continuing commitment and a focus on continuous improvement.

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## OUR BUSINESS

Woven Image's core business is the design, production, and supply of sustainable acoustic finishes and textiles.

Woven Image subscribes to being an ethical and sustainable business, and identifies modern slavery as being contrary to good business practices.

### Our employment policy is to:

- Pay employees in accordance with all applicable industrial obligations arising from modern awards, the Fair Work Act and any other statute or law affecting the employment relationship.
  - Ensure accurate record keeping for all employees in respect of pay and hours worked.
  - Pay all superannuation contributions.
  - Ensure all employees have a lawful right to work in Australia.
  - Ensure any migrant workers are treated lawfully with regard to terms and conditions of employment, and any applicable visa conditions.
  - Work in a safe environment, free from physical and psycho-social hazards.
  - Work in an environment free from all forms of unlawful discrimination.
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## OUR SUPPLY CHAIN

Woven Image procures from Australia and overseas. Woven Image primary suppliers provide:

- Material manufacturing services.
- Component part manufacturing.
- Raw materials for product manufacturing.
- Machinery and tooling for manufacturing.
- Logistic services for product distribution.
- Packaging materials.

In relation to the Woven Image global supply chain, inclusive of outsourced business services and contractors, our policy is to:

- Do business only with ethical businesses who share our values.
- Not use price solely as the reason to determine who we may do business with.
- Ensure outsourced business services and contractors employment policies align with Woven Image's outlined above.
- Ensure our suppliers collaborate in ensuring that modern slavery practices do not exist either within their own business, or within their own supply chains.
- Ensure our suppliers have an effective ongoing process to identify, detect and address any modern slavery practices.

Our approach is to work collaboratively with suppliers and any government or industry regulatory bodies to ensure compliance with the objectives of this Policy.

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## **APPLICATION OF THIS POLICY**

This Policy applies to everybody who has business dealings with us. This includes employees at all levels, directors, labour hire workers, volunteers, interns, contractors, external consultants, and business partners.

Woven Image will also communicate this policy to all suppliers, contractors, and business partners, noting that:

- Any act by an employee that is in contravention of this Policy may be viewed by Woven Image as a serious offence and grounds for disciplinary action, including dismissal.
  - Any act by an individual or organisation that has business dealings with Woven Image that is in contravention of this Policy, may be grounds for termination of that business relationship.
  - Woven Image may amend this policy at any time.
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## **QUESTIONS ABOUT THIS POLICY**

If you have any questions, comments or suggestions about the content or application of this Policy, including any improvements, please contact [sustainability@wovenimage.com](mailto:sustainability@wovenimage.com).