

MODERN SLAVERY POLICY

Pickwick 1A is committed to the highest standards of business culture. As an Aboriginal and Torres Strait Islander leading facilities services provider, our core business is to make a difference in the Aboriginal and Torres Strait Islander communities in which we live and work. We recognise the social impact of our business practices and our public accountability.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common depriving an individual of their freedom for personal or commercial gain by a third party. Pickwick 1A has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and implementing and enforcing systems and controls to ensure modern slavery is not taking place anywhere within our business or supply chains.

Pickwick 1A is also committed to ensuring there is transparency in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Australian government legislation. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect the same high standards from all contractors, suppliers and other business partners, and it is a requirement that contractors, suppliers and business partners of Pickwick 1A will uphold these standards in assessing their supply chains.

Purpose and Scope

This policy sets out Pickwick 1A's position to modern slavery. Pickwick 1A and all its subsidiary companies must comply with this policy and ensure that it is brought to the attention of all staff, suppliers, contractors and business partners.

This policy applies to all individuals and corporations working with Pickwick 1A, including but not limited to officers, directors, managers, employees, consultants, contractors, trainees, interns, placement students, homeworkers, part-time and fixed-term employees, casual and agency staff and volunteers.

Breaches of this policy

Breaches of this policy may result in immediate termination of any activities giving rise to any on-going or potential contravention of social and legislative requirements, and any information collated may be handed to the police in connection with a possible criminal investigation.

Roles and Responsibilities

The CEO has overall responsibility for ensuring this policy complies with Pickwick 1A's legal and ethical obligations, and that all those under our control comply with it. All state / territory General Managers will have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in identifying instances of potential slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on the issue of modern slavery in supply chains and methods of identifying where this may potentially occur.

Communication Awareness and Training

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular

training will be provided as necessary.

Senior management are responsible for ensuring that all staff receive the appropriate level of training.

Pickwick 1A treatment of modern slavery and policy requirements must be communicated to all suppliers, contractors and business partners as appropriate at the outset of our business relationship with them and reinforced as appropriate thereafter.

Compliance with this policy

All staff must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the business or supply chain is the collective responsibility of all those working for or under Pickwick 1A's managerial control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff must notify their manager as soon as possible if it is suspected that a breach or potential breach of this policy has occurred or may occur in the future.

Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If a suspected breach of this policy has occurred or a potential breach may occur, Pickwick 1A management must be notified as soon as possible. The welfare and safety of local workers are a priority and consistent with our obligations under the Modern Slavery Act, Pickwick 1A will not tolerate coercive, abusive and exploitative work practices within our supply chains.

If anyone is unsure about whether any act or treatment of workers or their working conditions within any tier of our supply chains contravenes this policy, they are encouraged to raise the matter with a Pickwick 1A manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Treatment of any matters raised in respect of Modern Slavery reporting will be governed by Pickwick 1A's Whistleblower Policy.

Leanne Phillips

Leanne Phillips
Chairperson and Director
Pickwick 1A Facilities Services Pty Ltd
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