

# MODERN SLAVERY

## POLICY STATEMENT

### *Modern Slavery - Statement of Intent*

The purpose of this policy is to set out how All Valve Industries (AVI) will deal with Modern Slavery within its supply chain, provide awareness of what is Modern Slavery and encourage individuals to be on the lookout for and report suspected acts of Modern Slavery. This policy will set out the guidelines AVI is to follow, the protection that is afforded to those that report acts of Modern Slavery and training on what is Modern Slavery.

All Valve Industries (AVI) strongly rejects any form of modern slavery and is dedicated to eliminating all forms of modern slavery from within its business undertakings and supply chain.

With the introduction of the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW) (the Acts), AVI is committed to assist with the eradication of Modern Slavery by implementing this policy and managing the risk with suppliers so as not engage in Modern Slavery.

### *Definition and Examples of Modern Slavery*

Modern Slavery is defined in the Modern Slavery Act (NSW) 2018 as conduct which would constitute:

- a. any conduct constituting a modern slavery offence,
- b. any conduct involving the use of any form of slavery, servitude or forced labour to exploit children or other persons taking place in the supply chains of government agencies or nongovernment agencies.

Modern Slavery is defined in the Modern Slavery Act (Cth) 2018 as conduct which would constitute:

- a. an offence under Division 270 or 271 of the Criminal Code; or
- b. an offence under either of those Divisions if the conduct took place in Australia; or
- c. trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- d. the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Examples of what constitutes Modern Slavery is forms of slavery such as servitude, trafficking in persons, forced labour, debt bondage, forced marriages, sale of and/or sexual exploitation of children or sale of children for forced labour exploitation, where victims are forced to work out of fear of violence and/or intimidation.

## *Reporting*

AVI will report to the Minister the actions it has taken to prevent Modern Slavery within its structure, supply chains and organisation, in accordance with the legislation.

## *Actions AVI will take to eradicate Modern Slavery within its Supply Chains*

AVI is committed to making sure that it does not engage suppliers that breach Modern Slavery legislation by regularly reviewing supply agreements.

AVI is committed to holding its suppliers accountable to their commitment of eradicating Modern Slavery and will not knowingly engage suppliers that do not align with its position on enforcing basic human rights.

All AVI supply contracts will include a clause pertaining to Modern Slavery requiring the Supplier to:

- a. Provide commitments to eradicating Modern Slavery within its own supply chains;
- b. Warranting that it has not been convicted of a Modern Slavery offence; and
- c. Have completed its own due diligence on its supply chain.

AVI will conduct risk assessments to determine which areas of its supply chain are most at risk of Modern Slavery offences and implement risk minimisation strategies.

AVI will review supplier contracts in conjunction with the Acts and ensure terms in supplier contracts are consistent with and address the Acts' requirements.

AVI will perform due diligence on the supply chains of its suppliers.

## *Application and Responsibility*

If an employee, contractor, volunteer or related person to AVI is aware of AVI or a supplier or servicer provided that is breaching the Modern Slavery Laws, the individual should report the breach to the AVI Whistleblower Protections Officer, being the Managing Director.

AVI will protect those individuals that report or identify breaches in the Modern Slavery Laws occurring within the organisation and supply chains.

Any questions regarding this policy should be directed to the AVI Managing Director.

AVI will provide training to inform employees of this policy

## *Review of this policy*

The AVI Managing Director will review this policy at least annually to ensure it remains relevant, current and compliant with all applicable laws.

**Reviewed:** April 2023

**Approved by:** Trent Kilner, Managing Director