

# **ANC Modern Slavery Policy**

#### 1. Introduction

ANC is committed to ensuring that we mitigate any risk of Modern Slavery within our supply chain and operations in line with the <u>Modern Slavery Act 2018 (Cth)</u>.

## 2. Background

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour

Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. These practices are also harmful and may be present in some situations of modern slavery.

Modern slavery can occur in every industry and sector and has severe consequences for victims. Modern slavery also distorts global markets, undercuts responsible business, and can pose significant legal and reputational risks to entities.

Entities have a responsibility to respect human rights in their operations and supply chains, as outlined in the <u>United Nations Guiding Principles on Business and Human Rights</u>. This includes taking steps to assess and address modern slavery risks. Taking action to combat modern slavery also makes good business sense. Entities that take action to combat modern slavery in their operations and supply chains can protect against possible business harm and improve the integrity and quality of their supply chains.

## 3. ANC's commitment to preventing Modern Slavery

Preventing Modern Slavery occurring within ANC is key to our commitment to social responsibility and sustainability. In accordance with the Modern Slavery Act 2018 (cth) ANC is committed to upholding the protection of human rights. We are committed to ensuring that we are not complicit in any human rights violations and hold our suppliers and partners to this same exacting standard.

ANC supports the principles proclaimed in the <u>Ten Principals of the United Nations Global Compact</u> and believes businesses should ensure that they are not complicit in human rights abuses.

Each year we will provide a Modern Slavery statement (as required under Australian law) that describes the actions we have taken to address Modern Slavery risks.

## 4. Reporting unlawful and unethical conduct

If you suspect there is a breach of this policy, please ensure you report this matter immediately. Reports of unlawful conduct with regards to modern slavery, are responded to in accordance with the ANC <u>Whistle-blower Policy</u>. To receive protection of any disclosure under this Policy an Eligible Person must make their disclosure to one of the following Disclosing Officers:

- Group Executive People and Capability
- National HR Manager

A discloser may elect to make a report a breach, anonymously. ANC will respect the discloser's right to not identify themselves. If the discloser wishes to stay anonymous, their disclosure should be forwarded to one of the Disclosing Officers, marked "Private and Confidential" and "Only Open by the Addressee", to the following address;

ANC Attention: [name of the relevant Disclosing Officer you are sending the disclosure to]
PO Box 8246
Blacktown NSW 2148

### 5. Review

This Policy will be reviewed annually.

#### 6. Associated Policies & Documentation

- ANC Code of Ethics <u>https://ancsafety.com.au/wp-content/uploads/2019/10/Code-of-Ethics.pdf</u>
- 2. ANC Human Rights Policy <a href="https://ancsafety.com.au/wp-content/uploads/2019/10/Human-Rights-Policy.pdf">https://ancsafety.com.au/wp-content/uploads/2019/10/Human-Rights-Policy.pdf</a>
- 3. ANC Whistleblowing Policy <a href="https://ancsafety.com.au/wp-content/uploads/2020/01/Whistleblowing-Policy.pdf">https://ancsafety.com.au/wp-content/uploads/2020/01/Whistleblowing-Policy.pdf</a>
- 4. ANC Modern Slavery Statement <a href="https://ancdelivers.com.au/wp-content/uploads/2021/12/Modern-Slavery-Statement-ANC-Dec2021.pdf">https://ancdelivers.com.au/wp-content/uploads/2021/12/Modern-Slavery-Statement-ANC-Dec2021.pdf</a>

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Position Title: CEO

Revision History						
Document Ref:	Modern Slavery Policy	Revision:	03	Approved:	17 December 2021	
Owner:	ANC	Approver:	Group Executive People & Capability			
Next Review:	December 2023					
This document cannot be modified without the approval of Director ANC						Page 2 of 2