



# MULTOTEC

## Multotec (Pty) Ltd

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## Modern Slavery Policy

### Purpose

Multotec is committed to limiting any risk of modern slavery occurring within its business, related parties, from infiltrating its supply chains or through any other business relationships.

The policy applies to any persons or groups working for and or on behalf of the company, in any capacity or role including employees, officers, directors, contractors, agents, consultants or any other third parties.

Multotec will only do business with organisations who comply fully with this policy or those taking committed and verifiable steps towards compliance.

Multotec requires all who have or seek to have a business relationship with the company to familiarise their organisation and staff with the policy and act in a way consistent with its values. This policy forms an integral part of the Multotec code of conduct and ethics.

This policy will inform or underpin any statement on slavery and human trafficking that the company is required to produce further to the transparency in supply chain requirements of the *Modern Slavery Act 2018 (Cth) (The Act)*.

### What is meant by Modern Slavery?

There are many forms of this complex and multi-faceted issue. Modern Slavery as defined in the Modern Slavery Act 2018 (Cth) (the Act) 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).

**Supplier** means any individual, company or entity that sells or provides a product or service to Multotec.

### Policy

Multotec is committed to reducing the risk of Modern Slavery within Multotec and its supply chain in accordance with its obligations under the Modern Slavery Act (Cth) 2018.

Multotec requires all Suppliers to comply with the Act, this Policy and the Multotec Supplier Code of Conduct. Suppliers are required to investigate and report to Multotec on the modern slavery and labour practices of its supply chains to ensure compliance with the Act.



Multotec is committed to implementing and maintaining effective systems and controls to ensure compliance. These include:

1. Conducting risk assessments of its supply chain to determine areas with the highest risk of Modern Slavery.
2. Engaging directly with selected key Suppliers to assess the risk of modern slavery within the Supplier and its supply chain.
3. Ensuring contractual agreements includes compliance with the Act.

Multotec reserves the right to terminate any Supplier contract if there is deemed to be a breach of this Policy, the Multotec Supplier Code of Conduct or the Act.

Tackling modern slavery requires colleagues to play a part and remain vigilant to the risk in all aspects and operations of the Multotec business, business relationships and supply chain arrangements.

### **Responsibility for This Policy**

The Board has overall responsibility for this policy and in ensuring that Multotec complies with all its legal and ethical obligations.

The Managing Director will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All Managing Directors are responsible for ensuring that their subsidiary complies with the provisions of this policy in the day to day performance of their roles.

### **Communication and Employee Awareness Training**

Line Managers will ensure that relevant colleagues are made aware of and receive training on this policy (such as the **Modern Slavery Module**) and any supporting processes applicable to their role. All documentation related to the system to be distributed through Multotec's communication boards. If any part is unclear clarification can be sought from the operations team management, HSEQ or corporate management.

### **Policy Breaches**

Breaches of this policy by any employee, group, director or officer may lead to disciplinary action through Multotec's disciplinary procedures. All colleagues will be expected to co-operate in any investigation into suspected breaches to the fullest extent possible.

### **Status of this Policy**

The Board will review this Modern Slavery Policy on a scheduled basis. This notice reflects the company's current practices and may be updated from time to time to reflect any changes due to legal or operational requirements.



Nigel Kriel

Managing Director

