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The Anti-Slavery and Human Trafficking Policy

Purpose:

BPW Transpec is committed to robust compliance with the *Modern Slavery Act 2018 (Cth)* ('the Act'). That commitment extends beyond the mandatory annual Modern Slavery Statement to putting in place processes for assessing, monitoring and mitigating risk of Modern Slavery in our immediate business, as well as more remote supply chains.

Modern Slavery:

Modern Slavery concerns the worst forms of exploitation of people, it is both a crime under Australian and International Law, but it is also a grave Human Rights violation. Identifying and eradicating modern slavery particularly focusses on vulnerable groups such as migrant workers, temporary labour, low skilled labour, women, and children.

Under the Act, the following conduct constitutes Modern Slavery:

- Slavery and Slavery-like conditions;
- Human Trafficking;
- Debt Bondage;
- The worst forms of Child Labour.

BPW's Commitment:

This policy applies to all officers, directors, staff, consultants, contractors, suppliers of BPW Transpec. Tackling the complex issue of Modern Slavery is the responsibility of everyone within BPW Transpec to be aware, vigilant and proactive in our approach. At present we have assessed our risk of being involved in Modern Slavery as remote. However, best practice demands that we actively engage with the risk and empower our staff and suppliers to participate in the work of identifying and mitigating risk and remediating where unacceptable practices are discovered even if they do not rise to the high threshold of Modern Slavery.

As part of our commitment to Human Rights and combatting Modern Slavery, we hereby adopt the UN Guiding Principles on Business and Human Rights as described in chapter II: The Corporate Responsibility to Respect Human Rights. These principles highlight that businesses have capacity to impact on human rights and as such have a responsibility to avoid infringing human rights and address adverse human rights impacts of their activities.

Our annual Modern Slavery Statement will contain an assessment of our present risks of being involved in Modern Slavery. It will also include steps to be undertaken to bolster our competencies in understanding risk of Modern Slavery in our supply chains and considering ways to increase our impact downstream to encourage robust monitoring and remediation of risk in our supply chains.

The Executive Board carries primary responsibility to meet the objectives and process improvements set out in each Modern Slavery Statement. The Executive Board is also responsible for being proactive with looking for opportunities to provide staff with relevant training to develop a culture of awareness around Modern Slavery within the business.

This Policy and actions taken under it will be reviewed regularly by the Executive Board and amended accordingly.