

# Modern Slavery Awareness Policy

**Version 2**

**18<sup>th</sup> February 2026**

<b>Version</b>	<b>Owner</b>	<b>Approval Date</b>	<b>Effective Date</b>	<b>Last Reviewed</b>	<b>Next Review Date</b>
2	Sandra Macnaughton	As from date signature	As from date signature	18.02.26	1.3.28
<b>Document Statement</b>					
<b>Purpose</b>	Engagis is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.				
<b>Scope</b>	The policy applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.				

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## 1. Introduction

Engagis expects all who have, or seek to have, a business relationship with the Company to familiarize themselves with this policy and to act in a way that is consistent with its values.

The Company will only do business with organizations who fully comply with this policy, or those who are taking verifiable steps towards compliance. This policy will be used to underpin and inform any statement on slavery and human trafficking that the Company is required to produce further to the transparency in supply chain requirements of Australian *Modern Slavery Act 2018 (Cth)*.

This policy sets out how we:

- raise awareness of modern slavery risks,
- prevent and identify potential exploitation,
- respond appropriately to concerns, and
- assign clear accountability across key business functions.

Although Engagis is **not required to report** under the **Modern Slavery Act 2018 (Cth)** (as our consolidated revenue is below \$100 million), we adopt this policy as part of our **voluntary best-practice approach to ethical business conduct and people governance**.

## 2. What Do We Mean By Modern Slavery

‘Modern slavery’ refers to serious forms of exploitation where a person cannot refuse or leave work due to threats, coercion, deception, or abuse of power. This can include forced labour, human trafficking, servitude, debt bondage, the worst forms of child labour, forced marriage, migrant worker exploitation and deceptive recruitment practices.

- Slavery: where ownership is exercised over an individual
- Servitude: involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them
- Migrant Worker Exploitation; unscrupulous employers and labour agents to exert control over them. Ie; Tied Visas, Threats of Deportation, Debt Bondage, Confiscation of Documents, Wage Theft and Deductions, Excessive Work Hours, Unsafe Work Conditions.

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Other forms of modern slavery, which will not be tolerated but are not specifically referenced in the Act, include, but are not limited to:

- Child labour: whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of one person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires colleagues to play a part and remain vigilant to the risk in all aspects of the Engagis business and business relationships.

## 3. Expectations

Engagis will only do business with organizations who fully comply with this policy, or those who are taking verifiable steps towards compliance. This policy will be used to underpin and inform any statement on slavery and human trafficking that the company is required to produce further to the transparency in supply chain requirement of 'Australian Modern Slavery Act 2018 (Cth)'.

### Exclusions / context:

- We do **not** rely on labour hire, agency workers, or outsourced workforce models.
- Our risk profile is therefore **low**, but not zero.

## 4. Policy Commitments

Engagis commits to:

1. **Awareness** & **prevention**  
Ensuring our people understand what modern slavery is, how to recognise warning signs, and how to raise concerns safely.
2. **Fair** and **ethical** **employment** **practices**  
Ensuring employment relationships are freely entered into, clearly understood, and fairly remunerated.
3. **Safe** **reporting** and **non-retaliation**  
Providing accessible speak-up mechanisms and protecting individuals who raise concerns in good faith.

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4. **Proportionate due diligence**  
Applying reasonable, risk-based checks to our domestic suppliers and business partners.
5. **Appropriate response and remediation**  
Taking timely, people-centred action if concerns arise, including support for affected individuals.

## 5. Governance & Accountability

- **CEO** 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.
- **Executive Leadership Team (ELT)** provides oversight of this policy and ensures appropriate resourcing.
- **People & Culture (P&C)** is responsible for implementation, training, grievance handling, and continuous improvement.
- **All managers** are responsible for day-to-day awareness, early identification of concerns, and escalation.
- **Finance, Payroll, and Procurement** support prevention and detection through their respective controls.

## 6. Roles & Department Obligations (Practical Responsibilities)

### RACI Key

- **R** = Responsible (does the work)
- **A** = Accountable (ultimate owner)
- **C** = Consulted
- **I** = Informed

Activity / Control Area	ELT	Managers	P&C	Procurement	Finance	Payroll
Approve policy & governance oversight	<b>A</b>	I	C	I	I	I
Maintain & update policy	I	I	<b>R/A</b>	C	C	C
Staff awareness & training	I	<b>R</b>	<b>A</b>	I	I	I
Onboarding (rights, speak-up info)	I	C	<b>R/A</b>	I	I	C
Identify & escalate concerns	I	<b>R</b>	<b>A</b>	I	I	C

Operate speak-up / grievance process	I	I	<b>R/A</b>	I	I	I
Triage of reported concerns	I	C	<b>R/A</b>	C	C	C
Investigation & response coordination	I	C	<b>R/A</b>	C	C	C
Worker support & remediation	I	C	<b>R/A</b>	I	C	C
Domestic supplier screening	I	I	C	<b>R/A</b>	C	I
Ethical contract clauses	I	I	C	<b>R/A</b>	C	I
Monitor financial red flags	I	I	I	C	<b>R/A</b>	C
Payroll accuracy & deductions	I	I	C	I	C	<b>R/A</b>
Escalate payroll red flags	I	I	<b>A</b>	I	C	<b>R</b>
Record-keeping & evidence	I	I	<b>R/A</b>	C	C	C
Voluntary best-practice reporting (if adopted)	<b>A</b>	I	<b>R</b>	C	C	C
Annual review & improvement	C	C	<b>R/A</b>	C	I	I

## 7. Awareness & Training

- All employees receive modern slavery awareness as part of onboarding.
- Managers receive additional guidance on:
  - recognising warning signs,
  - responding to disclosures, and
  - escalation pathways.
- Training is refreshed periodically and tracked by P&C.

### 7.1. People Leaders / Managers (all departments)

Managers must:

- Maintain a workplace culture where concerns can be raised safely and promptly.
- Be alert to indicators of exploitation (e.g., worker fear, restricted movement, withheld documents, unusual recruitment fees, excessive overtime without choice).
- Escalate any suspected modern slavery concerns immediately via the process in Section 10.
- Ensure contractors and labour hire arrangements under their control follow onboarding and verification requirements (Section 8 & 9).

#### **Manager “must-dos” (minimum):**

- Complete role-based training bi-annually.

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- Use only approved suppliers (Procurement-approved).
- Never retain worker passports/IDs or allow others to do so.

## 7.2. People & Culture (P&C) / HR

P&C will:

- Embed modern slavery risk controls into recruitment, onboarding, and labour hire management.
- Conduct checks and controls to reduce exploitation risk, including:
  - ensuring employment terms are clear, understood, and freely agreed;
  - ensuring no recruitment fees are charged to workers (especially migrant workers);
  - monitoring labour hire arrangements and high-risk roles/sites.
- Maintain safe grievance pathways (including anonymous options) and coordinate trauma-informed support and referral pathways. (Good practice resources for business emphasise grievance/response capability.)
- Support consultation with entities owned/controlled when preparing the Modern Slavery Statement (if applicable).

### **P&C controls (recommended):**

- Contract templates include worker protection clauses and audit/cooperation obligations.
- Use only approved labour hire providers (Procurement-approved).
- Site induction includes “Speak Up” guidance and worker rights information.

## 7.3. Procurement / Supplier Management

Procurement will:

- Run supplier due diligence proportionate to risk (country/sector/service type) and maintain a supplier risk register.
- Embed modern slavery requirements into sourcing and contracting, including:
  - supplier code of conduct acknowledgement;
  - subcontractor flow-down obligations;
  - cooperation with investigations and remediation.
- Ensure procurement decisions consider modern slavery risk, not only cost and timelines.

### **Procurement “minimum requirements”:**

- Ensure all suppliers have either a Modern Slavery Awareness Policy or agree to follow Engagis Modern Slavery Awareness Policy.

## 7.4. Installation Team

Installation team will:

- Embed modern slavery requirements into sourcing and contracting with external installation teams
  - subcontractor flow-down obligations;
  - Sign off on modern slavery awareness policy
- Ensure contractors / installer decisions consider modern slavery risk, not only cost and timelines.

### **Installation team “minimum requirements”:**

- Ensure all contractors / installers have either a Modern Slavery Awareness Policy or agree to follow Engagis Modern Slavery Awareness Policy.

## 7.5. Finance (including AP / Controls)

Finance will:

- Support risk detection through payment controls and anomalies monitoring, for example:
  - unusual payment routing (e.g., paying a third party instead of the contracted supplier);
  - repeated late changes to bank details;
  - large cash components where not justified;
  - split invoicing patterns that obscure labour costs.
- Ensure financial controls align with responsible sourcing and contract compliance expectations. (Actions taken and effectiveness must be described in statements, so controls and evidence matter.)

## 7.6. Payroll

Payroll will:

- Ensure wages and entitlements are paid correctly and transparently, with clear records and accessible payslips (including non-standard workforces).
- Monitor for red flags such as:
  - payments diverted to someone other than the worker without legitimate authority;
  - repeated “deductions” not supported by policy/contract;
  - identical bank accounts for multiple workers (potential control by a third party).

**Important boundary:** Wage underpayment may be a separate legal issue; however, certain patterns can be indicators of coercion/exploitation requiring escalation under this policy. (Australian guidance encourages risk-based identification and response.)

## 8. Due Diligence (Proportionate to Risk)

Given our domestic, low-risk operating model, due diligence focuses on:

- engaging reputable Australian suppliers;
- maintaining transparency in commercial and payment arrangements; and
- escalating concerns where supplier behaviour appears inconsistent with our values.

## 9. Reporting Concerns (Speak Up)

Any employee who suspects modern slavery or exploitation connected to our business must report it promptly via:

- their manager (where safe to do so),
- People & Culture, or
- the confidential speak-up channel

There will be **no retaliation** against anyone who raises a concern in good faith.

## 10. Response & Remediation

If a concern is identified, Engagis will:

1. prioritize the safety and wellbeing of affected individuals;
2. assess and investigate the concern proportionately;
3. take corrective action to stop harm;
4. provide or support remediation where appropriate; and
5. strengthen controls to prevent recurrence.

## 11. Record Keeping & Evidence

We maintain records to evidence our actions and support reporting (where applicable), including:

- Supplier assessments and risk ratings
- Contract clauses and supplier commitments
- Training completion
- Incidents, investigations, and remediation actions (Risk Register)
- Effectiveness measures and outcomes (Risk Register)

## 12. Breaches of this Policy

The breach of this policy by an employee, director or officer of the Company may lead to disciplinary action being taken in accordance with the Company’s Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

Breaches may also trigger supplier contract remedies (including suspension or termination), subject to safe remediation considerations.

## 13. Monitoring and Review

This policy will be reviewed bi-annually, or earlier where required due to changes in business operations, supply chain risks, or legislative/guidance updates.

This notice reflects the Company’s current practice. Engagis will update the notice from time to time to reflect legal and operational requirements and or government policy changes.

<b>Roles and Responsibilities</b> Identify all the roles involved and their responsibilities in the enforcement of the document	
<b>Document Owner</b>	People & Culture
<b>Contact</b>	Sandra Macnaughton
<b>Supporting Documents</b>	
Modern Slavery and Awareness Course Modern Slavery and Awareness Test	
<b>Definitions</b>	
<b>Nil</b>	

*Vuk Milonjic* \_\_\_\_\_ Apr 08 2026 \_\_\_\_\_  
Vuk Milonjic Date  
CEO


## 14. Version History

<b>Version</b>	<b>Approved By</b>	<b>Approval Date</b>	<b>Effective Date</b>	<b>Sections Modified</b>
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1.2	Vuk Milonjic	As from date Signature	As from date Signature	Added next review date
2	Vuk Milonjic	As from date of signature	As from date of signature	Whole document rewritten and expanded with better clarification on roles and responsibilities.

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