

Version: 1 Date last approved: April 2024

Date Due for review: April 2025

Authority to amend: Board

Purpose

Modern Slavery is a crime and violation of human rights and is defined under the *Modern Slavery Act 2018* (Cth) (the Act) as including eight types of serious exploitation:

- trafficking in persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; and
- the worst forms of child labour which means situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Shorelyne Pty Ltd ATF Shorelyne Trust is committed to limiting the risk of Modern Slavery occurring within its business, infiltrating its supply chain or through any other business relationship. Tackling Modern Slavery requires the company's employees and other stakeholders to play a part and remain vigilant to the risk in our business and business relationships.

Scope

This policy applies to all persons working for and with Shorelyne Pty Ltd ATF Shorelyne Trust or on its behalf in any capacity, including employees, directors, officers, volunteers, interns, external consultants, third-party representatives, and business partners.

Policy Statement

Shorelyne Pty Ltd ATF Shorelyne Trust has a zero-tolerance approach to Modern Slavery and is committed to:

- Continually improving our processes and thinking in the ways we identify, manage, and reduce our Modern Slavery risk.
- Acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our own business operations or supply chains.
- Ensuring there is transparency in our approach to tackling Modern Slavery throughout our business and supply chains.

The prevention, detection and reporting of Modern Slavery in any part of Shorelyne Pty Ltd ATF Shorelyne Trust's business and supply chains is the responsibility of all those working for it or

under its control. In the event of any likely Modern Slavery breaches in any part of the supply chain or business, these issues should be raised with the CEO at the earliest possible stage.

Policy Program

Shorelyne Pty Ltd ATF Shorelyne Trust operates within a policy framework that has been designed to ensure the highest standards of conduct and ethical behaviour, including in relation to Modern Slavery risks. This framework comprises of:

- Code of Conduct
- Anti-Fraud, Bribery and Corruption Policy
- Whistle-blower / Speak Up Policy
- Workplace Health and Safety Policies

Procurement of Goods and Services

Shorelyne Pty Ltd ATF Shorelyne Trust's main suppliers provide the following services: construction, property management, property maintenance services, professional services, telecommunications, and IT services.

Procuring goods and services will, as far as reasonable, be conducted in a way as to ensure that the Company sources goods and services from entities that comply with their obligations under the Act. The extent of the due diligence conducted in the procurement process will depend on the types of goods or services being sourced.

Some examples of the due diligence that may be conducted include requesting:

- self-assessment that the supplier complies with various provisions in the Act;
- a copy of the supplier's most recent Modern Slavery statement (if applicable);
- details of structure and operations of their supply chain; and/or
- details of the actions taken by the supplier to manage and address Modern Slavery risks in their supply chain. If a proposed contract is included as part of the procurement, consideration must be given to a provision ensuring compliance with the Act.

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Contract Management and Monitoring Key Suppliers

Shorelyne Pty Ltd ATF Shorelyne Trust will continue to monitor its operations and supply chains to determine which parts of the business and supply chains are most at risk from Modern Slavery, so efforts can be focused on areas most at risk. Where a risk is determined, Shorelyne Pty Ltd ATF Shorelyne Trust will engage with existing and new suppliers to inform them of the company's policy and to gain an understanding of the measures they have in place to ensure that Modern Slavery is not occurring in their own businesses.

Shorelyne Pty Ltd ATF Shorelyne Trust will do business with organisations who have implemented their own policies and procedures to limit the risk of Modern Slavery occurring

within their businesses or supply chains and will avoid suppliers that fail to meet these standards, having regard to a period of transition and materiality considerations.

Our contractual documentation incorporates specific requirements with respect to the prohibition against Modern Slavery and requires our suppliers to maintain similar requirements with their own suppliers.

Statement Preparation, Endorsement and Approval

The Act requires that an annual statement be prepared and approved for each financial year where the Company has a revenue of at least \$100 million. Should this be required, 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 Modern Slavery Act 2018.

Education and Training

As part of Shorelyne Pty Ltd ATF Shorelyne Trust's commitment to promote ethical and responsible behaviour and prevent Modern Slavery and human rights breaches within its operations, Senior Management will ensure that relevant employees receive adequate training on the policy and any supporting processes applicable to their role.

Effectiveness

In line with our commitment to continuously improve our response to Modern Slavery risks, we will continue to progress our engagement with our suppliers and our business to develop and improve methods of assessing and monitoring the effectiveness of our actions in relation to Modern Slavery.

Date	Section	Reason	Author	Ratified
2023	All	Inception	CEO	