Stockwells.

Policy

Subject description:	Modern Slavery
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Introduction

Modern slavery refers to the exploitation of workers in extremely poor and predatory conditions. This may take the form of forced labour, forced marriage, debt bondage or human trafficking. In Australia, companies are required to make risk-based assessments to reduce the possibility of this occurring in their supply chains. Even though Stockwell's primarily works with domestic clients, we wish to encourage our partners to improve their business practices to exclude the possibility for modern slavery to occur.

The logistics and warehousing business are particularly vulnerable to modern slavery risks. The high-demand nature of labour in this industry means that workers in countries with limited employment protections have a higher chance of being exploited.

This policy will describe the nature of modern slavery, along with implementing procedures that focus on consulting with business partners to reduce these risks where they are identified. Furthermore, this policy will conduct a risk assessment of current business destinations to alert people in the business of the risks in each country and how these can be mitigated.

Our business and supply chains

Our business and supply chains handle freight coming from all around the world. Predominantly, this involves freight from Asia, Europe and North America.

Asia presents a significant risk for importing goods that may be a product of human slavery. China, Bangladesh, Malaysia, Vietnam, India and Thailand present the greatest risk, containing 60% of all people currently experiencing modern slavery in the world. Countries in the region experiencing war and economic problems often have the worst conditions for modern slavery, specifically Myanmar, Pakistan and India, where forced labour and marriage are often used to deal with economic stress.

This means that countries experiencing political and economic instability should be considered as high risk for having modern slavery. Furthermore, industries that are most vulnerable to modern slavery include:

- Electronics from China and Malaysia
- Garment manufacturing from Bangladesh, Brazil, China, India and Malaysia
- Solar Panels from China
- Textiles from China

- Fish from China, Indonesia, Taiwan and Thailand

Policies

Stockwell International Pty Ltd operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- **Whistleblowing Policy** - we encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- **Code of Conduct** - our code encourages employees to do the right thing by specifying the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Due diligence

Stockwell International Pty Ltd has a responsibility of due diligence for all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Auditing the suppliers, and their health and safety standards, labour relations, and employee contracts via risk profiling
- Requiring improvements from suppliers if they are high on our risk profile
- Cease use of suppliers that fail to improve their performance in line with our requirements and if necessary, report to relevant bodies or regulators our findings.
- Suppliers to endorse our suppliers code of conduct.

Where possible Stockwell International will work with domestic suppliers to provide services, where protections against modern slavery are world leading. This allows us to control exposure to modern slavery risks and support local employment in line with the National Employment Standards (NES).

Our status as an Australian Trusted Trader (ATT) means that Stockwell International has demonstrated a history of strong compliance with customers, border and trade laws. This entrusts Stockwell's with favourable treatment at the Australian border due to its history in supporting legitimate trade overseas.

Risks for modern slavery

All employees should be aware of the different kinds of risk indicators for modern slavery that should be considered for business, not only in Australia but overseas.

Type of Risk	Indicators
Sector and industry risks	• Use of unskilled, temporary or seasonal labour • Child labour • Use of foreign workers

	• Recruitment strategies that target disadvantaged communities
Product and service risks	• Job requirements that pressure workers to work excessive hours • Children are used to produce a product • Product is made by high-risk industries in high-risk countries
Country risk	• Country does not have adequate protections against slavery • Country is experiencing active war. civil unrest or economic hardships • Lack of workplace legislation • High levels of impoverishment
Specific indicators of modern slavery	• Victims are unpaid, work excessive hours, live at the workplace, are managed by a 'third party company' that holds their money for them or appear to be servicing a debt to an employer or third party. • Victims have been deceived about their terms of employment • Are required to work in a workplace with no PPE, training or dangerous work practices. • Victims are forced to breach visa requirements to work.

Suspected incidents of modern slavery

If you suspect modern slavery is occurring with any suppliers, contractors or clients, please refer to our **Whistleblowing Policy** to follow the correct procedure.

An investigation will be made into all allegations that are made and correct reporting to the Australian Anti-Slavery Commissioner (https://www.antislaverycommissioner.gov.au/find-help-and-support/report-suspected-modern-slavery) will be made. Corrective action will be taken to ensure that Stockwell International conducts its business practices ethically.

Signed: _____ Date: _____/_____/_____

David Stockwell (CEO)