

MODERN SLAVERY POLICY

Date of issue: 25.01.2021

Date of amendment: 22.05.2024

1. Policy statement

- 1.1 Modern slavery is a violation of fundamental human rights. It can also be a criminal offence. R.M.Williams (**we, us, our**) is committed to reducing the risks of modern slavery in our business operations and supply chains, and to managing modern slavery incidents where they might occur. This commitment is important to us, as well as to our stakeholders, customers and employees, both in Australia and internationally.
- 1.2 'Modern slavery' is a broad term that refers to any situation of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception. It includes conduct that would constitute an offence under existing human trafficking, slavery, and slavery-like offence provisions in the *Criminal Code Act 1995* (Cth). It also includes forms of conduct such as forced marriage, forced labour, debt bondage, human trafficking, and child labour.
- 1.3 We have zero tolerance to slavery, and we expect the same commitment from all organisations that we do business with.

2. Application

- 2.1 This policy (**Policy**) applies to:
 - (a) our employees, individual contractors and officers (together, our **Personnel**) at all levels; and
 - (b) our contractors, suppliers, and other business partners (together, our **Suppliers**).

3. Framework

- 3.1 Our Modern Slavery Risk Management Framework (**Modern Slavery Framework**) guides our approach to assessing and addressing modern slavery risks in our supply chain. It is underpinned by the policies and guidelines listed below and comprises the following key areas of focus:
 - (a) **Governance**

Fostering a framework of strong policies and contractual arrangements that embed our values in the way we operate.
 - (b) **Risk Screening**

Undertaking due diligence to assess how goods and services in our supply chain are managed and produced.
 - (c) **Supplier Engagement**

Engaging with suppliers to better understand and support their efforts to combat slavery.

- (d) **Training and Collaboration**
Raising awareness of modern slavery issues, both with our Personnel and through active collaboration with our Suppliers.
- (e) **Monitoring & Reporting**
Complying with the *Modern Slavery Act 2018* (Cth) and tracking operational metrics within our Modern Slavery program.

3.2 Our policies and guidelines in relation to Modern Slavery are:

- (a) Modern Slavery Policy
- (b) Supplier Agreements
- (c) Supplier Ethical Code of Conduct
- (d) Whistleblower Policy
- (e) Workplace Behaviour Policy
- (f) Employee Code of Conduct
- (g) Workplace Grievance Policy
- (h) Sustainable Procurement Guidelines
- (i) Preferred Fibres & Materials Guidelines
- (j) Risk-based, internally prioritised due diligence processes and audit framework

4. Responsibility

- 4.1 Our Modern Slavery Committee has the primary responsibility for managing this Policy, monitoring compliance with this Policy and investigating potential and actual incidents of modern slavery in our operations and supply chains (including breaches of this Policy). The Modern Slavery Committee reports and/or refers matters to our board of directors (as appropriate).
- 4.2 Our Sustainability and Strategic Sourcing Teams are responsible for conducting modern slavery risk mapping and risk assessments of our operations and Suppliers.
- 4.3 Each member of our management team is responsible for ensuring that those who report to them understand and comply with this Policy.

5. Training

- 5.1 We will provide appropriate training, including refresher training, relating to this Policy and related policies and procedures.
- 5.2 Any newly hired Personnel will receive training as part of their induction.
- 5.3 Records of all completed training sessions that are undertaken will be maintained and recorded on the Human Resources Information System (RedSeed).

6. Compliance

- 6.1 All Personnel and Suppliers must read, understand, and comply with this Policy.

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- 6.2 At all times whilst working as part of our operations and supply chain, Personnel and Suppliers must avoid any activity that would be, or could give the impression of:
- (a) an incident of modern slavery, whether they caused the incident, contributed to the incident, or are directly linked to the incident; and/or
 - (b) a breach of this Policy.
- 6.3 To the extent that it is practicable, we include contractual provisions in agreements with our suppliers to:
- (a) require the Supplier to meet and comply with standards equivalent to our commitment under this Policy (or, if applicable, take verifiable steps towards compliance) and generally act in a way that is consistent with its values and ethics;
 - (b) require the Supplier to hold its own contractors, suppliers, representatives, and business partners to the above standard;
 - (c) require the Supplier to remediate any breach of the above standard; and
 - (d) give us the right to terminate if the Supplier is in breach of the above standard, fails to work towards full compliance with the above standard, or fails to take remediation action as required by us.

7. Supply chain grievance mechanism

- 7.1 All workers within our supply chain must have a channel for putting forward grievances as well as access to an efficient procedure for the handling of violations or grievances. This includes providing a supportive and open atmosphere where people feel comfortable bringing up issues and issues can be escalated accordingly.
- 7.2 Suppliers must have functional and effective processes in place such that workers can voice their concerns. This includes written grievance procedures that protect employee privacy, protect against possible retribution, and permit workers to report unfair treatment to someone other than their supervisor.
- 7.3 Suppliers must also require their own suppliers to have an effective grievance mechanism.

8. Non-compliance

- 8.1 If any of our Personnel or Suppliers believe, or have a reasonable suspicion, that there has been a breach of this Policy, that there may be a breach of this Policy in the future or that there are any other modern slavery issues with our supply chain, they must promptly notify us. Such notifications can be sent to our Sourcing or Compliance Team via reporting@rmwilliams.com.au or through the grievance mechanism referred to in section 7 above.

9. Remediation

- 9.1 If we determine that there has been a breach of this Policy by a Supplier, we will endeavour to have that Supplier identify and correct that breach. If it is apparent that an individual has suffered harm because of such issue, we will seek to ensure that they are 'made good' by that Supplier.
- 9.2 If we caused or contributed to any breach of this Policy, we will take action to remedy any impact as appropriate and take steps to avoid further breaches.

10. Breach

- 10.1 We may terminate our relationship with any Supplier if:
- (a) the Supplier breaches this Policy, including by failing to comply with a remediation requirement; or
 - (b) an entity working on behalf of a Supplier engages in an act of modern slavery with the Supplier's knowledge.
- 10.2 Breaches of this Policy by any of our Personnel may lead to disciplinary action in accordance with our Code of Conduct, and serious breaches may result in immediate dismissal.

11. Review and amendments

- 11.1 Our management team is responsible for overseeing our ethical sourcing and modern slavery commitments and will review this Policy regularly (no less than every 2 years) to ensure it continues to evolve and reflect community expectations and ensure we are complying with all our legal obligations.
- 11.2 This Policy cannot be amended without approval of our board of directors.