



Paying.Green

POLICY

Fraud and Corruption Risk Management

POLICY: MODERN SLAVERY

1. Introduction

Paying.Green[®] is values driven and community focused and seeks to maintain the highest level of trust with its stakeholders, customers, employees, suppliers, vendors and the communities in which it operates.

2. Purpose

This policy supports **Paying.Green's** commitment to eradicating modern slavery in all its forms and to fulfil its obligations under the requirements of the Australian Modern Slavery Act 2018 (the Act). This policy pays particular attention to ensuring **Paying.Green's** supply chains are examined and that suppliers provide written assurance that modern slavery does not exist in their operations and supply lines.

Paying.Green[®] is committed to acting with integrity in its business dealings and relationships and holds its contractors, suppliers and other business partners to the same high standards. **Paying.Green**[®] has implemented systems and processes to eradicate modern slavery in its organisation and supply chains. As part of its contracting process, **Paying.Green**[®] has specific prohibitions against modern slavery practices and suppliers are expected to hold their own suppliers to the same high standards.

3. Application of this Policy

This policy sets out:

- a) Definition of modern slavery consistent with the Act;
- b) Process for annual reporting;
- c) Reporting obligations and approval process; and

- d) Guidance for employees.

This policy applies to all employees, contractors, subcontractors, suppliers, vendors, agents, consultants and all other persons working for **Paying.Green**[®].

The Chief Executive Officer of the Company has overall oversight for this policy and all members of **Paying.Green's** leadership team have responsibility for its day-to-day implementation, monitoring and dealing with any queries about it. Management at all levels are be responsible for ensuring that their teams understand and comply with this policy.

4. Who can report?

4.1 Reporting of modern slavery

Anyone can report modern slavery to their manager or to our Human Resources Department. All employees need also to be aware of the Company's Whistle Blowing Policy.

4.2 How will **Paying.Green**[®] respond to a case of modern slavery?

Paying.Green[®] will report any case of modern slavery to the Australian Border Force and, where appropriate the Police. For employees, the Department of Home Affairs has published guidance available here, and summarised below:

- a) Do not attempt to resolve the situation by yourself;
- b) Ensure your actions are always in the best interests of the suspected victim or victims;
- c) Consider if further action is required to verify if modern slavery is occurring;
- d) Consider whether and how to involve law enforcement; and
- e) Recognise that you may not be aware of all the victims involved or the extent of the exploitation.

5. Reporting Obligations



5.1 Timing of Reports

Paying.Green® will report annually, within six months of the close of the financial year which is on or before 30th June each year.

5.2 Content of Reports

The report will include the following:

- a) The legal name of Paying.Green®;
- b) A description of Paying.Green's legal structure, its operations and its major supply chains;
- c) Description of the risks of modern slavery in Paying.Green's operations and supply chains;
- d) The actions Paying.Green® undertook to assess and address these risks, including due diligence and remediation processes;
- e) How the reporting entity assesses the effectiveness of these actions; and
- f) Any other relevant information.

5.3 Responsibility in preparing and submitting Reports.

Reporting is the responsibility of Paying.Green's Human Resources Department.

When the report has been approved by Paying.Green's Human Resources Department, it will be submitted to the Australian Border Force via slavery.consultations@abf.gov.au.

The Australian Border Force will then publish Paying.Green's statement on the online central register where it will be a public domain document.

5.4 Approval of Reports

The Act requires the principal governing body for the reporting entity to approve the report. For the Company this means the Board of Paying.Green®.

The Report must include a statement that the governing body has approved the report, the date of approval, the name of the governing body and a signature and full name of a member of the governing body.

6. Policy Review:

Paying.Green® will review this policy annually.

7. Related documents:

- Paying.Green® Whistle Blowing Policy
- Paying.Green® Code of Conduct