

# POLICY AGAINST MODERN SLAVERY

October 2019

Version 1.0



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## 1. Policy Overview

TasNetworks values human rights and is committed to ensuring that all business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. It is vital for TasNetworks to maintain this reputation as it generates confidence in its business.

The *Modern Slavery Act 2018* (Cth) (the **Modern Slavery Act**) imposes obligations on TasNetworks to make annual public reports about its actions to address Modern Slavery risks in its business operations and supply chains. The Modern Slavery Act applies to all of TasNetworks' operations (including its subsidiaries).

This document is directed to assisting TasNetworks to comply with its obligations under the Modern Slavery Act and reducing the Modern Slavery risks posed to its business and its supply chains.

## 2. Who does this Policy apply to?

This Policy applies to all directors, officers and team members (collectively, **you**) of TasNetworks. This Policy should also be read in conjunction with TasNetworks' Code of Conduct, and other relevant policies (see reference policies in section 6).

It is important that you comply with the obligations set out in this document. Modern Slavery can cause genuine and significant harm to the individuals affected and there are significant reputational, financial, market and operational risks for TasNetworks if Modern Slavery risks are not properly detected and addressed.

## 3. The Policy

### 3.1. Purpose

TasNetworks takes its compliance with its statutory obligations seriously. As noted above, this document is directed to (amongst other things) assisting TasNetworks to comply with its obligations under the Modern Slavery Act.

TasNetworks has a zero-tolerance approach to Modern Slavery within its business and supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place in its own business or in any of its supply chains.

This document sets out important information as to the steps that TasNetworks will take in response to identifying a Modern Slavery risk. You must familiarise yourself with this document to assist TasNetworks in effectively carrying out its duties in compliance with the Modern Slavery Act. Given



the harm that can result from Modern Slavery, it is important that TasNetworks responds swiftly to any potential Modern Slavery incident or risk.

### 3.2. Policy Statement

TasNetworks prohibits all forms of Modern Slavery. TasNetworks' employees, contractors, subcontractors, vendors, suppliers, partners, representatives, agents and others through whom TasNetworks conducts business must not engage in any practice that constitutes any form of Modern Slavery. Examples that may constitute Modern Slavery are set out in **Annexure 1**.

TasNetworks is committed to this Policy and has put, or is putting in place, measures that are designed to prevent and detect Modern Slavery in TasNetworks' business and supply chain. TasNetworks' programme in this regard contains the following elements:

- a) this Policy;
- b) communication of this Policy and all relevant elements of the programme to all employees throughout TasNetworks and to its business partners and supply chain;
- c) the assessment of Modern Slavery risks within TasNetworks' business operations and its supply chain and the development of effective, efficient and transparent controls to reduce exposure to those risks;
- d) the adoption of anti-slavery requirements in contracts;
- e) the conducting of appropriate due diligence on business partners, agents, contractors, consultants, subcontractors and suppliers coupled with a requirement that they implement procedures which incorporate the principles of the Modern Slavery Act;
- f) training of all relevant individuals throughout TasNetworks so that individuals can recognise Modern Slavery practices and take steps to avoid them;
- g) TasNetworks is also committed to ensuring there is transparency in its own business operations and in its approach to tackling Modern Slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act;
- h) TasNetworks provides safe and fair working conditions for all its employees and ensures that no child labour is employed, in line with minimum age laws within Australia. TasNetworks expects the same standards from all of its contractors, suppliers and other business partners and as part of its contracting processes, includes specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children and expects that its suppliers will hold their own suppliers to the same standards;
- i) investigation and audits to verify that TasNetworks' business is being conducted in compliance with this Policy, and that TasNetworks' suppliers are compliant with anti-slavery requirements; and
- j) taking steps to rectify any Modern Slavery identified within the business including TasNetworks' supply chain.



Pursuant to the Modern Slavery Act, TasNetworks commits to publishing an annual public statement, setting out the steps it has taken during that particular financial year to ensure that Modern Slavery is not taking place in any of TasNetworks' supply chains or within its own business.

#### 4. Roles and responsibilities

**Modern Slavery Compliance Officer:** TasNetworks' Modern Slavery Compliance Officer is responsible for the administration and maintenance of this Policy. The Modern Slavery Compliance Officer also has primary and day-to-day responsibility for:

- implementing this Policy,
- monitoring its use and effectiveness,
- responding to queries;
- coordinating auditing of internal control systems and procedures to ensure they are effective in countering Modern Slavery; and
- coordinating any corrective actions required to address any Modern Slavery issues identified.

The Modern Slavery Compliance Officer is entitled to call upon any resources that he or she considers necessary to assist him or her in the performance of his or her role.

The Modern Slavery Compliance Officer is the Leader Corporate Social Responsibility who can be contacted on (03) 6271 6696 or at [kirstan.wilding@tasnetworks.com.au](mailto:kirstan.wilding@tasnetworks.com.au).

TasNetworks **Leaders** are responsible for ensuring that team members comply with this Policy and receive appropriate training on it.

All employees are responsible for complying with this Policy. This includes pro-active and prompt reporting of any suspected violations of this Policy, and cooperation with any investigations or audits into breaches of the Policy.

#### 5. Definition – Modern Slavery

Modern slavery (as defined in Divisions 270 and 271 of the *Criminal Code 1995* (Cth)) is a crime and a violation of fundamental human rights. It takes various forms, such as:

- **slavery:** one person treats another as though he or she owns that person and that person is deprived of his or her freedom.
- **servitude:** a person is coerced to provide services, forced to live on another person's property and cannot change his or her condition.



- **forced labour:** a person is forced to involuntarily work or to provide a service without remuneration under the menace of a penalty.
- **trafficking in persons (including trafficking of orphanage children):** a person arranges or facilitates the travel of another person to be exploited, and without that person's knowledge or consent. This can be even where the person consents to the travel as they may have been deceived or unduly influenced.
- **forced marriage:** a person enters into a marriage without freely and fully consenting, because they were coerced, threatened or deceived or otherwise incapable of understanding the nature and effect of the marriage ceremony.

In addition, the definition of modern slavery in the Modern Slavery Act includes:

- **child labour:** children below 12 years of age undertaking at least one hour of economic activity or 28 hours of domestic work per week, or children aged between 12 and 14 years of age undertaking at least 14 hours of economic activity or 42 hours of domestic work and economic activity combined per week.
- **debt bondage:** a person's pledge of labour or services is security for the repayment of a debt or other obligation, but there is no hope of actually repaying the debt. The services required to repay the debt, or the time in which to repay the debt, may be undefined.
- other slavery-like practices.

(Together, **Modern Slavery**).

## 6. References

- Code of Conduct
- Procurement Policy
- Workplace Behaviour Policy
- Diversity Policy

### 6.1. Compliance

All team members are responsible for complying with this policy, and any breaches of this policy will be treated seriously and may result in disciplinary action being undertaken.

#### Public Interest Disclosure Statement (“Whistleblowers”)

If an individual is concerned about consequences associated with reporting a serious breach of this Policy, that individual should refer to the Public Interest Disclosure (Whistleblowers) Policy available on The Zone or talk to their Leader.



## 7. Need to know more or have a question?

All Team Members will have access to this Policy and underpinning policies on The Zone. Support and further information is available from the Modern Slavery Compliance Officer, your Leader, People & Performance Partner or Legal Services.

## 8. Administration of this Policy

This policy is administered by Corporate Social Responsibility and will be reviewed on a biennial basis (or when required in response to legislative change) and updated where applicable.

Authorisations		
Policy Level: 1		
Action	Name	Date
Prepared by	Michael Chan	July 2019
Reviewed by	TasNetworks Leadership Team	August 2019
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25 September 2019	0.3	Final Draft	M Chan	ACC
31 October 2019	1.0	Final Version – for publication	M Chan	Board





**Annexure 1 – Examples that may constitute Modern Slavery**

- Engaging in any form of trafficking in persons.
- Using forced labour in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment or offering of employment / contract positions to candidates, such as failing to disclose basic information in a format and language accessible to the potential candidate, or making material misrepresentations during the recruitment of candidates regarding key terms and conditions, including wages and fringe benefits, location of work, living conditions, housing and associated costs, any significant costs to be charged to the candidate, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place.
- Charging applicants / candidates recruitment fees.
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country's housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

