



Modern Slavery Policy

Prepared by Altis Consulting

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Revision History

Prepared By

Version	Change Description	Prepared By	Date
1.0	Initial policy prepared	Legal	November 2020

1 Scope

This policy applies to all persons working for Altis Consulting or on our behalf in any capacity, including employees at all levels, contractors, volunteers and third-party representatives. Altis Consulting may amend this policy it at any time.

2 Definitions

Modern Slavery Act 2018 being the Commonwealth legislation (the Act) enacted by the Parliament of Australia (and may be amended from time to time).

Modern slavery for the purposes of this policy is defined as including eight types of serious exploitation and outlined in Section 3.

Risks of modern slavery practices means the potential for Altis to cause, contribute to, or be directly linked to modern slavery through its supply chains and operations.

Suppliers is defined as any organisation or person who provides us with goods or services, including their subcontractors, agents, related entities and consultants.

Supply chains is defined as the products and services (including labour) that contribute to Altis own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

3 What is Modern Slavery?

Modern slavery is defined by the Modern Slavery Act (2018) AU and the Modern Slavery Act (2015) UK which include many types of exploitation and can be understood as:

- **trafficking** in persons, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
- **slavery**, which is where the offender exercises powers of ownership over the victim;
- **servitude** which is where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work;

- **forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work;
- **forced marriage**, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
- **debt bondage**, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
- **the worst forms of child labour**, which involves situations where children are exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
- **deceptive recruiting for labour or services** which is where the victim is deceived about whether they will be exploited through a type of modern slavery.

It can also extend to:

- entering a commercial transaction involving a slave;
- exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading;
- conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it);

4 Approach to limiting the risk of modern slavery practices

Altis Consulting will work proactively to reduce modern slavery within our supply chains and operations, and we expect all organisations we engage with to do the same.

4.1 Response to Modern Slavery

Altis Consulting does not use or condone, child or forced labour in any of its operations or premises and works to ensure these practices are not present in its workforce or supply chain.

We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse. Altis Consulting abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.

Where Altis is made aware of modern slavery practices in its own business or within its supply chain, Altis will investigate all claims and if valid, resolve the issue in line with the values expressed in this policy.

Altis Consulting provides training with the aim of educating all employees and contractors on signs that could indicate modern slavery, due diligence practices for engaging suppliers, auditing existing suppliers and what action an employee or contractor can take if they have a concern in relation to modern slavery.

Risk assessments are conducted to determine which parts of the business and supply chains are most at risk from modern slavery to ensure focus on those areas.

This policy will be used to underpin and inform any statement on modern slavery that Altis is required to produce because of legislative requirements in any country in which Altis Consulting operates.

4.2 Supply Chain

We expect all existing and new suppliers to comply with the principles set out in our Modern Slavery statement and policy. Fundamental to this document is an expectation that all Suppliers operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed.

Suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event, suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify Altis Consulting as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

Our commitment within the supply chain:

- Altis expects its suppliers to have similar values to the company in relation to modern slavery.

- Altis engages with suppliers to promote and support anti-slavery practices throughout the company's supply chain.
- Altis is committed to introducing anti-slavery obligations in all supplier contracts.

4.3 Communications, Engagement and Training

Altis Consulting team members will be provided communications and training opportunities to enhance their understanding of the causes and humanitarian impact of modern slavery, this policy and our approach to limiting the risk of modern slavery within our supply chains and operations.

Altis Consulting team members who initiate and/or periodically review relationships with third parties are provided with training to apply the central and whole of organisation due diligence tool and processes.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5 Compliance with this Policy

You must ensure that you read, understand, and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager.

If you are unsure about whether an act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Altis is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

5.1 Breaches/Non-Compliance of This Policy

Any breach of this policy will be taken seriously and dealt with on a case by case basis.

A breach of this policy by an employee may lead to disciplinary action being taken in accordance Altis Consulting's disciplinary policy. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to the disciplinary procedure.

A breach of this policy by a supplier will also be dealt with on a case by case basis.

6 Responding to concerns of modern slavery practices

The often-hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. It is important to respond in a way that is safe, ethical and respects the dignity and rights of the person at risk or affected by modern slavery practices.

There are a range of supports available for when an Altis team member becomes aware that someone is at risk of or affected by modern slavery practices, regardless of if this occurs within Altis Consulting supply chains and operations or in the broader community.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 237 to discuss or report a suspected case. Contact can be made anonymously.

In an emergency and if someone is in immediate danger, please call Triple Zero (000) for police assistance.