



UCS GROUP

MODERN SLAVERY STATEMENT (ANTI-SLAVERY POLICY)

UCS Group – Business Management System	Effective Date: 25 th November 2019
Approved By: Stephen Ellich – Chief Executive Officer	Review Date: Review No. 0
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1. POLICY

1.1. Scope

The document applies equally to all UCS Group’s (UCS) employees and stakeholders including UCS directors, subcontractors, consultants, suppliers and business partners.

1.2. Purpose

To provide information about the *Modern Slavery Act 2018 (Cth)* (MSA) reporting requirements by outlining UCS’s actions to address modern slavery risks to our company and supply chains.

2. MODERN SLAVERY STATEMENT

2.1. Introduction

UCS is committed to limiting the risk of modern slavery occurring within our business, including the risk of infiltration of our supply chains or any other business relationship.

UCS opposes all forms of slavery and forced labour in our operations and the operations of our suppliers. Our policy and governance approach to modern slavery is guided by our Code of Conduct.

UCS will only do business with organisations who fully comply with the MSA, or those who are taking verifiable steps towards relevant MSA compliance.

2.2. What is Modern Slavery?

Modern slavery can take many forms covering a range of exploitative practices including:

- **human trafficking:** involves arranging or facilitating the travel of another with a view to exploiting them
- **slavery:** where ownership is exercised over an individual
- **forced labour:** all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
- **child labour:** whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child’s education, health (including mental health), physical wellbeing or social development
- **Servitude:** involves the obligation to provide service imposed by coercion.

All forms of modern slavery have in common, the deprivation of a person’s liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual’s fundamental human rights.

Tackling modern slavery requires all stakeholders to play a part and remain vigilant to the risk in all aspect of UCS business and business relationships.

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2.3. Risk Management

Good corporate governance is critical to the long term, sustainable success of UCS through the development of policies and processes to address modern slavery risks and providing training for staff about modern slavery.

The UCS Board has ultimate responsibility for the oversight and approval of all risk management including human rights and modern slavery related risks.

UCS aims to implement the following measures:

- Conduct risk assessments to determine which parts of the business and which supply chains are most at risk from modern slavery so effects can be focused on the areas that are most at risk,
- Where appropriate, as informed by the risk assessment, UCS will engage directly with subcontractors and or suppliers in respect of this Anti-Slavery Policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses,
- To identify Tier 1 suppliers within UCS Group’s supply chain, inclusive of their location and/or structure within the identified supply chain.
- Our contractual documentation will incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy,
- Make provisions for our contracted suppliers and subcontractors to hold their own suppliers and subcontractors to the same standards,
- Employees will receive adequate training for their role on the Anti-Slavery Policy and any supporting processes applicable for their role.

2.4. Corporate Governance and Operational Structure



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2.5. Remediation

Good corporate governance is critical to the long term, sustainable success of UCS Group. It contributes to value creation and positive outcomes for all stakeholders. Good governance is embedded throughout UCS Group and is the collective responsibility of the Board and all levels of management. UCS Group seeks to adopt and practice leading contemporary governance standards and to apply these in a manner consistent with its culture and values.

Consistent with the Company’s risk management approach to human rights more generally, the risk of modern slavery in UCS Group’s organisation and supply chain is assessed within UCS Group’s corporate-wide risk management framework. Given the nature of this risk, the key focus of senior management is working collaboratively with UCS Group’s suppliers to ensure that expectations and standards are understood and the potential exposure to human rights risk is minimised.

Remedial action for any breach of the Anti-Slavery Policy may include:

- Requesting certain activities to stop or, introducing a grievance mechanism providing suppliers, employees or the community an easy avenue to raise modern slavery concerns;
- UCS Group has a number of mechanisms for employees and third parties to anonymously report suspected or actual illegal activity or Company Policy breaches, such as through the Company’s Code of Conduct and or Whistle-blower Policy. Employees and third parties are able to utilise the whistle-blower system by phone or email in order to reach the appropriate company officer. Each whistle-blower disclosure received is investigated and reported to the Chief Executive Officer. The instances and outcomes of the whistle-blower investigations are reported to ARMC.
- UCS Group's grievance procedures ensure all grievances are managed in a systematic, fair, timely and transparent manner.
- Training and educating and, assessing the effectiveness of that training and education, of modern slavery requirements;
- Terminating any contractual arrangements;
- Disciplinary action.

3. References

- UCS Code of Conduct (Behaviours and Ethics Policy and Procedure)
- [Modern Slavery Act 2018 \(Cth\)](#)

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