



## Introduction

SML Investments (QLD) PTY LTD t/a Jetstream Travel is a values driven corporate travel agency that aspires to meet and exceed the standards of professional, legal and ethical standards.

Our organisation prides itself on our commitment to transparency and openness and only engages with suppliers with the same values and ethics that align to our core principles.

## Purpose of Policy

This policy confirms our commitment to uphold the human rights of workers, and to treat them with dignity and respect. This applies to all full time, part time, casual and contracted workers.

SML Investments (QLD) PTY LTD t/a Jetstream Travel confirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.

## Related Policy Guidelines or Documents

- SML Investments (QLD) PTY LTD t/a Jetstream Travel Contracts including provisions requiring disclosure of modern slavery risks
- Checklist for Suppliers
- Whistleblower Protection Policy

## Audit / Evaluation

Document review and audits are to be carried out annually to comply with legislative requirements.

SML Investments (QLD) PTY LTD t/a Jetstream Travel

## Definition and Examples of Modern Slavery

Modern Slavery is defined in the **Modern Slavery Act (Cth) 2018** as conduct which would constitute:

1. an offence under Division 270 or 271 of the Criminal Code; or
2. an offence under either of those Divisions if the conduct took place in Australia; or
3. trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
4. the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

More broadly, Modern Slavery may be defined as conduct which would constitute:

- any conduct constituting a modern slavery offence,
- any conduct involving the use of any form of slavery, servitude or forced labour to exploit children or other persons taking place in the supply chains of SML Investments (QLD) PTY LTD t/a Jetstream Travel

## **Scope of Policy**

This policy applies to all SML Investments (QLD) PTY LTD t/a Jetstream Travel employees and any subcontractors within the SML Investments (QLD) PTY LTD t/a Jetstream Travel supply chain.

## **Policy**

As part of our hiring process workers must be engaged locally where available, be entitled by law to work in Australia and hold any and all current relevant license, certificate, visa or authorisation to conduct the work for which they have been engaged.

All work must be voluntary and workers shall be free to leave work at any time or terminate their employment in accordance with the relevant employment legislation, regulations or workplace laws governing the employee's engagement.

SML Investments (QLD) PTY LTD t/a Jetstream Travel and/or any of their suppliers may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.

Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

Child or student labour is not to be engaged by the company or its suppliers.

In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Additionally, workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices, both without fear of discrimination, reprisal, intimidation or harassment.

## **Reporting Concerns**

As required by law SML Investments (QLD) PTY LTD t/a Jetstream Travel will report to the Minister the actions it has taken to prevent Modern Slavery within its structure, supply chains and organisation, in accordance with the legislation.

Reporting unethical or unlawful conduct.

A key part of supporting ethical standards is enabling SML Investments (QLD) PTY LTD t/a Jetstream Travel and its subcontractors to feel free and safe to speak up when there are reasonable grounds to suspect that any person associated with SML Investments (QLD) PTY LTD t/a Jetstream Travel are not acting ethically or in accordance with laws and obligations.

Concerns about compliance or ethical issues or illegal or unethical activities are to be reported to YourCall on 1300 788 712 or via email at [info@yourcall.com.au](mailto:info@yourcall.com.au) our whistleblower hotline run by an external and independent third party.

### **Actions SML Investments (QLD) PTY LTD t/a Jetstream Travel will take to eradicate Modern Slavery within its Supply Chains**

SML Investments (QLD) PTY LTD t/a Jetstream Travel is committed to making sure that it does not engage suppliers that breach Modern Slavery legislation by regularly reviewing supply agreements.

SML Investments (QLD) PTY LTD t/a Jetstream Travel is committed to holding its suppliers accountable to their commitment of eradicating Modern Slavery and will not knowingly engage suppliers that do not align with its position on enforcing basic human rights.

All SML Investments (QLD) PTY LTD t/a Jetstream Travel supply contracts will include a clause pertaining to Modern Slavery requiring the Supplier to:

1. Provide commitments to eradicating Modern Slavery within its own supply chains;
2. Warranting that it has not been convicted of a Modern Slavery offence; and
3. Have completed its own due diligence on its supply chain.

SML Investments (QLD) PTY LTD t/a Jetstream Travel will conduct risk assessments to determine which areas of its supply chain are most at risk of Modern Slavery offences and implement risk minimisation strategies.

SML Investments (QLD) PTY LTD t/a Jetstream Travel will review supplier contracts in conjunction with the Acts and ensure terms in supplier contracts are consistent with and address the Acts' requirements.

SML Investments (QLD) PTY LTD t/a Jetstream Travel will perform due diligence on the supply chains of its suppliers.

### **Training**

SML Investments (QLD) PTY LTD t/a Jetstream Travel will provide training to inform employees of this policy and what constitutes Modern Slavery.

### **Protections**

SML Investments (QLD) PTY LTD t/a Jetstream Travel will protect those individuals that report or identify Modern Slavery occurring within the organisation and supply chains.

This statement is made pursuant to Part 2 section 16 of the Modern Slavery Act 2018 and constitutes our modern slavery statement for the financial year ending 30 June 2023.

  
Jonathan O'Mullane (Dec 14, 2023 14:16 GMT+11)

Dr Jonathan O'Mullane  
Director of SML Investments (QLD) PTY LTD t/a Jetstream Travel  
14th December 2023

This statement was approved on the 11th November 2023 and signed by Dr Jonathan O'Mullane as the Sole Director and principal governing body of SML Investments (QLD) PTY LTD t/a Jetstream Travel.

## Appendix 1: Suppliers Questionnaire Template

### QUESTIONNAIRE TO BE COMPLETED BY SUPPLIER

Please complete the below questions in as much detail as possible. Please return the completed Questionnaire to the nominated SML Investments (QLD) PTY LTD t/a Jetstream Travel contact (see above).

Contact details - Supplier	
Organisation name	
Organisation address	
ABN/ACN	
Parent company	
Contact person	
Contact email	
Contact phone	
Date of Questionnaire completion	
Additional documentation	
Is your organisation required to report under the <i>Modern Slavery Act (Cth) 2018</i> ? If so, please attach a copy of your modern slavery statement(s).	
Is there any other additional documentation you have attached to this questionnaire? If so, please list them here.	
Organisation structure	

1.	<p><b>How aware are you of the activities of businesses in your supply chain?</b></p> <p><input type="checkbox"/> <b>High:</b> You are aware of all essential products and services provided by businesses in your supply chain conduct regular audits to ensure compliance with your policy.</p> <p><input type="checkbox"/> <b>Moderate:</b> You are aware of the principal suppliers and essential products and services of your supply chain.</p> <p><input type="checkbox"/> <b>Developing:</b> You have identified major suppliers, however You have very limited knowledge of supply chains below that level.</p>
2.	<p><b>Does your organisation have a policy or policies in place to deal with modern slavery?</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If the answer is yes, please provide details or a copy of the policy and any documents that identify a process for ensuring compliance within the supply chain.</p>
3.	<p><b>Does your organisation have a person or team responsible for identifying and managing modern slavery risks within the organisation and the supply chain?</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please describe the role and responsibility of that person/team below.</p>
<b>Training</b>	
4.	<p><b>Do you conduct staff training on how to identify, assess and respond to modern slavery risks?</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please describe the nature and frequency of the training.</p>
<b>Supplier engagement</b>	
5.	<p><b>Are Modern Slavery risk assessments carried out on new suppliers?</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please describe the risk assessment process.</p>

6.	<p><b>Are there low-skilled migrant workers working in your organisation's supply chains?</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please provide information about where in your organisation's supply chain low-skilled migrant workers are employed.</p>
<b>Response processes</b>	
7.	<p><b>What action will you take if there are reports of modern slavery or substandard working conditions within your company or in its supply chains?</b></p>
8.	<p><b>Does your business conduct audits to identify and prevent risks of modern slavery in your business or supply chains?</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please describe these activities below.</p>

# Jetstream Travel Modern Slavery Statment

Final Audit Report

2023-12-14

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