

Friday, 24 May 2024

Anti-Slavery Policy Statement

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.

We are further committed to paying employees and providing conditions of employment in accordance with an applicable and lawful industrial instrument approved by the Fair Work Commission and to the standards set in the *Fair Work Act 2009*.

Management & Training Corporation Pty. Ltd. 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

- Management & Training Corporation Pty. Ltd. Contracts and Service Level Agreements include provisions requiring disclosure of modern slavery risks
- Modern Slavery Questionnaire
- Whistleblower Protection Policy

Audit / Evaluation

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

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 Management & Training Corporation Pty. Ltd.

Scope of Policy

This policy applies to all Management & Training Corporation Pty. Ltd. employees and any subcontractors within the Management & Training Corporation Pty. Ltd. supply chain.

Policy

As part of our hiring process workers are to be engaged locally where available, be entitled by law to work in Australia and hold any and all current relevant qualification, 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.

Management & Training Corporation Pty. Ltd. 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 Management & Training Corporation Pty. Ltd. 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 Management & Training Corporation Pty. Ltd. and its subcontractors to feel free and safe to speak up when there are reasonable grounds to suspect that any person associated with Management & Training Corporation Pty. Ltd. 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 whistleblower@mtctrains.com.au , which is monitored and managed by the Legal and Governance team.

Actions Management & Training Corporation Pty. Ltd. will take to eradicate Modern Slavery within its Supply Chains

Management & Training Corporation Pty. Ltd. is committed to making sure that it does not engage suppliers that breach Modern Slavery legislation by regularly reviewing supply agreements.

Management & Training Corporation Pty. Ltd. 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 Management & Training Corporation Pty. Ltd. 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.

Management & Training Corporation Pty. Ltd. 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.

Management & Training Corporation Pty. Ltd. will review supplier contracts in conjunction with the Acts and ensure terms in supplier contracts are consistent with and address the Acts' requirements.

Management & Training Corporation Pty. Ltd. will perform due diligence on the supply chains of its suppliers.

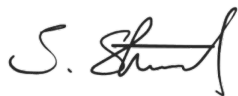
Training

Management & Training Corporation Pty. Ltd. will provide training to inform employees of this policy and what constitutes Modern Slavery.

Protections

Management & Training Corporation Pty. Ltd. will protect those individuals that report or identify Modern Slavery occurring within the organisation and supply chains.

Under Section 4 of the act, Mr. Troy Ittensohn, Managing Director of Management & Training Corporation Pty Ltd is appointed as the principal governing body and is authorised to sign modern slavery statements for the purpose of the Act.



Troy Ittensohn
Managing Director
Management & Training Corporation Pty. Ltd.
Monday, 24 May 2024