

**WE CARE.  
OUR SOLUTIONS.  
YOUR SUCCESS.**

# **MODERN SLAVERY STATEMENT**



# Statement

## Introduction

At Acu-Tech Pty Ltd, we are committed to upholding the highest ethical standards in all aspects of our business operations. As part of our dedication to combating modern slavery, we have developed this Modern Slavery Policy to align with Australian laws and reporting requirements. This policy outlines our commitment to eradicating modern slavery from our supply chains and operations and demonstrates our responsibility in addressing this critical global issue.

## Policy Statement

The Company acknowledges that modern slavery is a grave violation of human rights and takes a zero-tolerance approach towards any form of forced labour, human trafficking, child labour, or other exploitative practices. We firmly believe that it is our duty as a responsible corporate citizen to actively prevent and address modern slavery within our business activities.

## Scope

This policy applies to all employees, suppliers, contractors, consultants, and business partners associated with Acu-Tech's operations. It encompasses our entire supply chain, from raw material sourcing to product distribution and services.

## Compliance with Laws and Reporting Requirements

Acu-Tech will fully comply with the Modern Slavery Act 2018 and all relevant regulations and reporting obligations as required by Australian law. We are committed to submitting accurate and timely Modern Slavery Statements, detailing our actions and progress in combating modern slavery, as per the prescribed reporting timeline.

## Risk Assessment and Due Diligence

To identify and address modern slavery risks within our supply chain, we will conduct regular risk assessments. We will also undertake due diligence procedures to assess the practices of our suppliers, contractors, and other business partners to ensure they align with our commitment to eradicating modern slavery.

## Supplier and Contractor Engagement

We will engage with our suppliers and contractors to promote awareness and understanding of our Modern Slavery Policy. We expect our suppliers and contractors to uphold the same principles and comply with anti-slavery laws and regulations.

## Training & Awareness

All employees, particularly those in roles related to procurement and supply chain management, will receive training on modern slavery awareness, identifying potential risks, and reporting mechanisms.

## Reporting & Communication

Our Modern Slavery Statement will be published on our website and communicated to all stakeholders, including employees, suppliers, customers, and the public. It will provide a transparent account of our actions and progress in combating modern slavery.

## Non-Retaliation

We provide protection to employees and other stakeholders who raise concerns or report potential modern slavery risks in good faith. We are committed to ensuring that any such disclosures are treated confidentially and without fear of retaliation.

## Continuous Improvement

We are dedicated to continuously improving our efforts to combat modern slavery.

## Governance and Review

The Board of Acu-Tec Pty Ltd are responsible for this document and this Statement will be periodically reviewed as required by our Corporate Governance Review processes to always ensure its relevance and applicability and was last reviewed and approved by Acu-Tech as set out below:



**Ivan Morren** – Chief Executive Officer

July 2023





## Values & Culture

### Our Mission

Building Australia’s future.

### Our Vision

Delivering the best pipe solutions for our customers.


### Our Values

Our values fundamentally shape our operations, guide our decision making and behaviour, and distinguish us in the marketplace by aligning our practices with a unique cultural identity.




**S**  
**Safety**

We promote wellbeing first by following our health and safety practices and speaking up immediately if something seems unsafe.




**T**  
**Trustworthy**

We move fast with a high level of trust. We honour our commitments to our customers, team, and community.



**R**  
**Reliable**

We have the grit, perseverance, and bravery to overcome obstacles, and do what we say we will.




**I**  
**Innovative**

We bravely challenge, explore, and implement effective and improved ways to deliver the best solution.



**V**  
**Value**

We’re humble, hungry, and smart, believing that our team is our greatest asset. Every role and every person with a great attitude brings value.



**E**  
**Energy**

We’re driven by fearless energy, ‘hustle muscle,’ to achieve exceptional outcomes by motivating ourselves and those around us to give our best.

### Culture

Acu-Tech’s operates as a values-driven business, distinguished by a robust and unique culture. We believe that by harnessing the unique strengths of our greatest asset—our people—we will meet our ambitious goals and deliver meaningful value to the community and industry we operate in.

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## 1. About this statement

This statement has been prepared in compliance with the Australian Modern Slavery Act 2018 (Cth) (the Act) for the fiscal year from 1 July 2023 to 30 June 2024. It outlines the measures taken by Acu-Tech Pty Ltd and its controlled and/or related entities to identify and mitigate modern slavery risks within our operations and supply chains.

Throughout this document, terms such as “our,” “we,” “us,” “the Company,” “the group,” and “Acu-Tech Pty Ltd” refer collectively to Acu-Tech Pty Ltd (ABN 52 394 633 042), and its related entities. All references to a year pertain to the financial year ending [30 June 2024], unless specified otherwise. All monetary values are expressed in Australian dollars (A\$) unless indicated differently.

The definition of modern slavery used in this statement conforms to that in the Act, which includes slavery, servitude, forced labor, debt bondage, forced marriage, human trafficking, organ trafficking, deceptive recruitment for labour/services, and the worst forms of child labour.

### 1.1. Consultation

This Statement was drafted under the leadership of Acu-Tech’s Executive Management Team, which oversees the company’s Human Rights and Modern Slavery initiatives. The Executive Management Team collaborated with various departments, including Corporate Governance and Compliance, Finance, Procurement and Logistics, and Marketing, to ensure comprehensive coverage and alignment with our corporate values and legal obligations. The Statement received formal approval from Acu-Tech on [insert date of approval here].

### 1.2. Assurance

The Executive Management Team have used audited financial statements and its accounting systems including operational data; procurement spend etc. to produce the metrics for this report.

### 1.3. Feedback

We appreciate your feedback. Please send any comments regarding this statement or requests for further information to [customerservice@acu-tech.com.au](mailto:customerservice@acu-tech.com.au)

Acu-Tech recognises the First Nations peoples as the traditional custodians of the lands where we operate. We honour their deep cultural heritage and their enduring ties to the land, waters, and communities. We are privileged to collaborate and engage with First Nations peoples and express our deepest respect for their cultures, their Elders, and their leaders—both past and those who are emerging.



## 2. Message from the CEO

Modern slavery remains the most significant and complex human rights issue worldwide. It is a pervasive, hidden crisis often overlooked or ignored. According to the latest Global Estimates of Modern Slavery published by the International Labour Organisation in 2022, on any given day, there are approximately 49.6 million people living in conditions of modern slavery across the globe—an alarming increase of 10 million from 2017[CR1] .

Slavery is not relegated to history; it persists in nearly every country, disproportionately affecting women and children, the most vulnerable members of society.

Eradicating this egregious violation of human rights demands the determination to uncover these practices and drive meaningful change. As an ethical business operating in Australia, we are committed to playing a crucial role in combating modern slavery. We work collaboratively with our suppliers, governments, and communities to protect the rights of everyone, including our employees, the communities where we operate, those affected by our activities, our customers, and those within our supply chain.

This is our first Modern Slavery Report, under the Australian Modern Slavery Act 2018. Tackling modern slavery is a complex challenge that requires transparency and accountability. We must closely examine our supply chains to ensure we are part of the solution. This report reaffirms our dedication to transparency, highlighting both our achievements and the areas needing further improvement in combating modern slavery.

We maintain close cooperation with our suppliers to understand and support their efforts in managing risks associated with modern slavery.

Report: Global Estimates of Modern Slavery: Forced Labour and Forced Marriage (ilo.org)



**“Modern slavery represents one of the largest and most intricate challenges to human rights globally.”**

**Ivan Morren**

## 3. Project Excellence



**Modern Slavery Project launched**



**Modern Slavery Statement Produced**



**First Modern FY Slavery Report Prepared**



**Supplier Modern Slavery Questionnaire Produced and Issued**



**Commenced review of Standard Terms and Conditions used for our suppliers**



**Supply chain analysis and due diligence, targeting high risk profiles, completed**



**Partnered with experts in training and Modern Slavery and Human Rights specialists completed**



**Review and development of supporting policies and procedures completed**



**Established Modern Slavery Committee and nominated key team members**



**Developed Code of Conduct which includes Modern Slavery commitment and requirements applicable to all employees and suppliers**

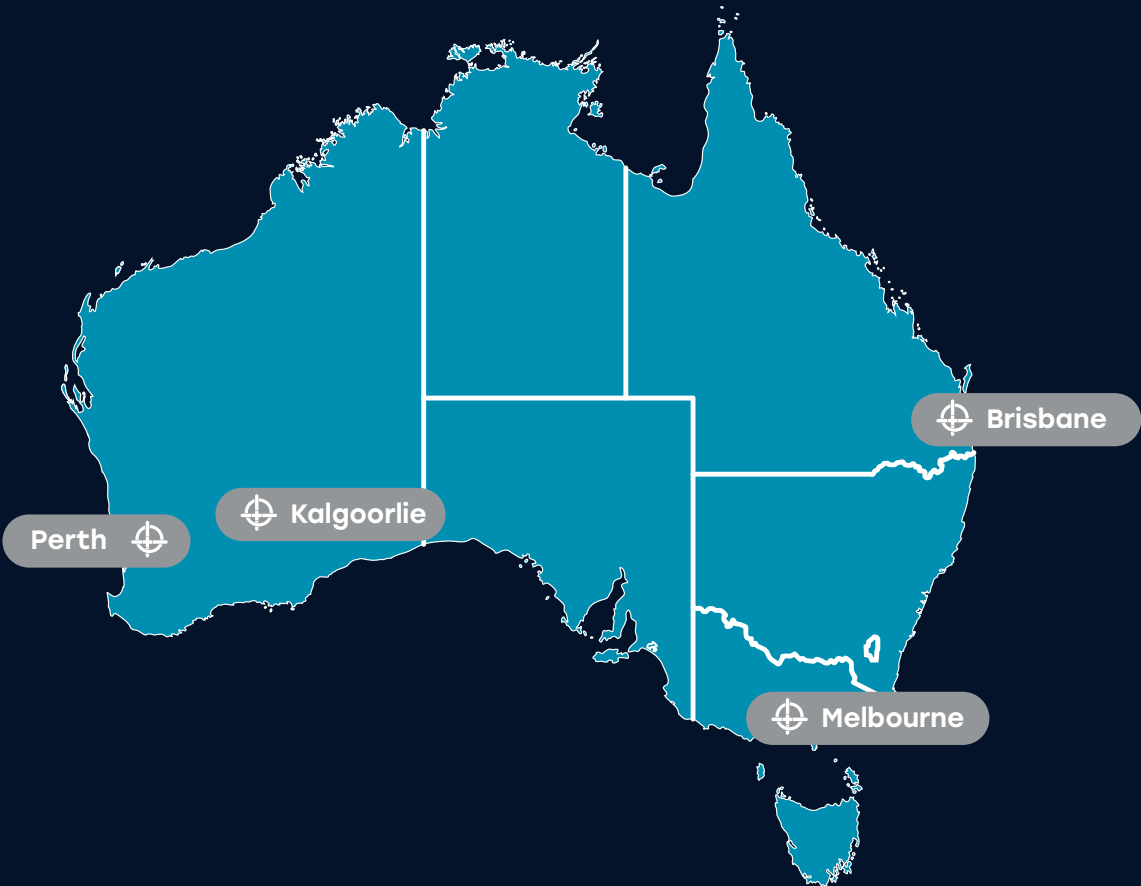




# 4. FY 2024 Tier 1 Operational Highlights

<p><b>10</b></p> <p>Suppliers based in Australia</p>	<p><b>18</b></p> <p>Suppliers based outside of Australia</p>	<p><b>8</b></p> <p>Countries in which our Suppliers operate</p>
<p><b>9 million</b></p> <p>Total Spend on Suppliers</p>	<p><b>3.6 million</b></p> <p>Total Spend on Suppliers based in Australia</p>	<p><b>5.4 million</b></p> <p>Total Spend on Suppliers based overseas</p>

# 5. About Acu-Tech



## DIRECTORS

<p><b>Ivan Morren</b></p> <p>Founder and Chief Executive Officer</p>	<p><b>Donovan Morren</b></p> <p>General Manager</p>	<p><b>Kevin Wibberley</b></p> <p>Chief Financial Officer</p>	<p><b>Matthew Pedersen</b></p> <p>Operations/Projects Manager</p>
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## CORPORATE STRUCTURE





## 5. About Acu-Tech

### 5.1 Our Modern Slavery Risks

We recognise the potential for modern slavery to occur within both our operations and our supply chain.

Given that our active production and sales operations are based in Australia, our risk assessments suggest that the greater risk of modern slavery exists within our supply chain.

Refer to section 9.7 for a list of our modern slavery risks and a summary of how we manage them.



## 6. Governance Framework

Strong corporate governance is essential for the sustained success of our company.

Effective governance is a shared duty of both the Board of Directors and the Executive Management Team. We are committed to adopting practices that are suitable and up to date with modern governance standards, applying them in ways that align with our values and culture.



### 6.1 Role of Board

The Board has final oversight of the Company's response to human rights matters and the approval of policies that support our compliance with the Act.

### 6.2 Role of the Executive Team and Key Activities

The Modern Slavery committee is accountable for the implementation of our Modern Slavery Statement, supported by the Executive Management Team.

The day-to-day project management and implementation of all processes and systems and co-ordination of their implementation that support this are undertaken by Dana O'Meara - Corporate Service Manager and Kelly Andrews - National Purchasing Manager. This role undertakes activities in close collaboration with other members of the Executive Team (refer section 5) and others within the business.

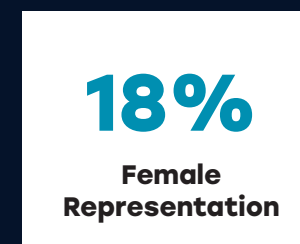




## 6. Governance Framework

Within our operations, key human rights related activities include but are not limited to:

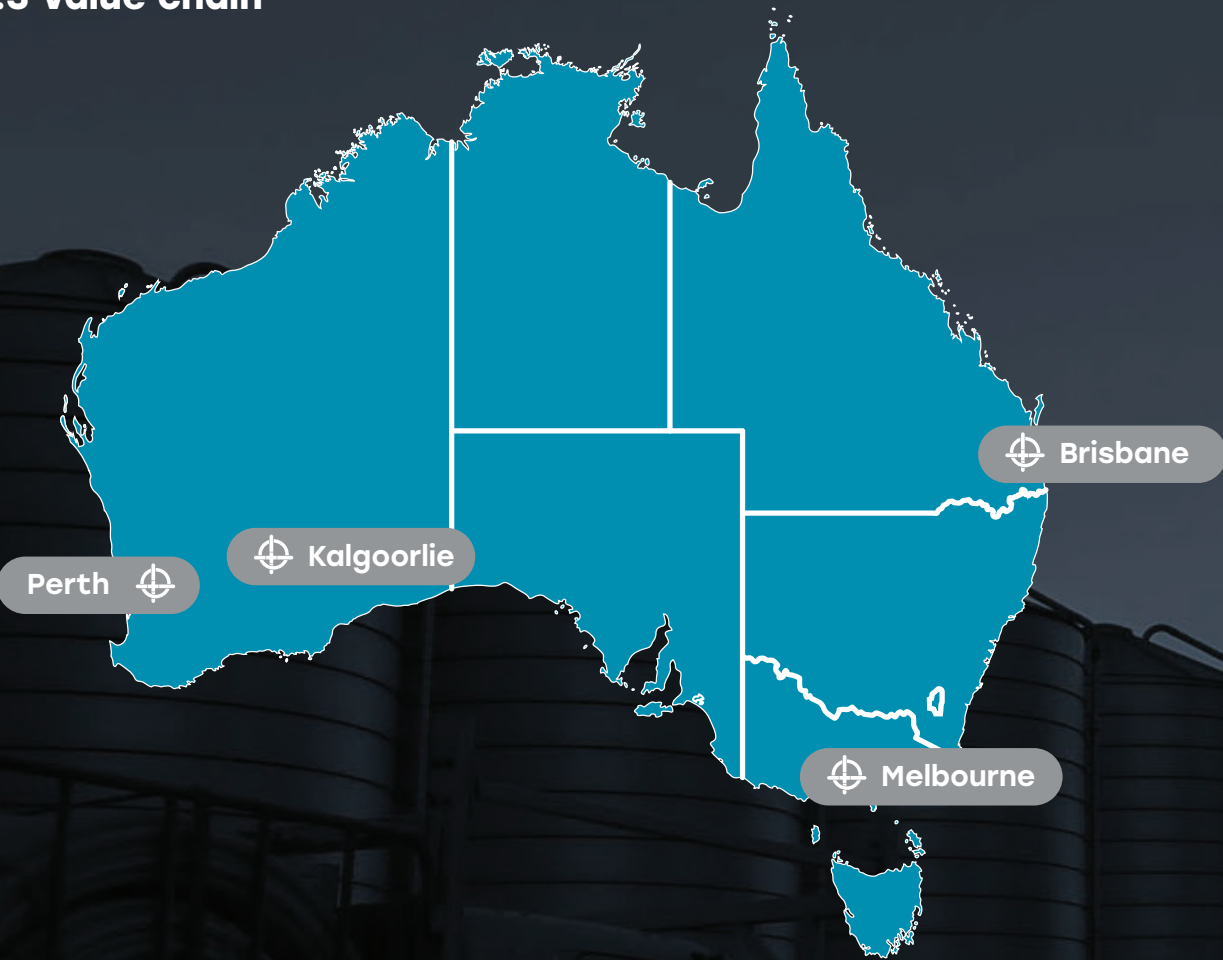
- Procurement and Logistics activities associated with managing our key strategic suppliers, sourcing, contract management and day-to-day procurement activities (including pre-selection of suppliers, supplier due diligence; accounts payable, and materials sourcing and management).
- Major Contract Relationship Management activities associated with the management and delivery of contractual obligations under contracts awarded by our key clients.
- Human Resources (HR) activities involve developing and enforcing robust employment practices that ensure fair treatment and compensation, prevent forced and child labour, and protect vulnerable groups. HR is responsible for conducting thorough background checks and audits to ensure compliance with labor laws and ethical standards across all operations, including relevant global supply chains. Training programs are also essential, designed to educate employees about recognising and reporting potential abuses of human rights and instances of modern slavery.
- Compliance – The Chief Finance Officer must ensure that grievance mechanisms are accessible and effective, allowing employees and supply chain workers to report violations without fear of retaliation. This comprehensive approach helps create a transparent, accountable, and ethical working environment that actively supports human rights.



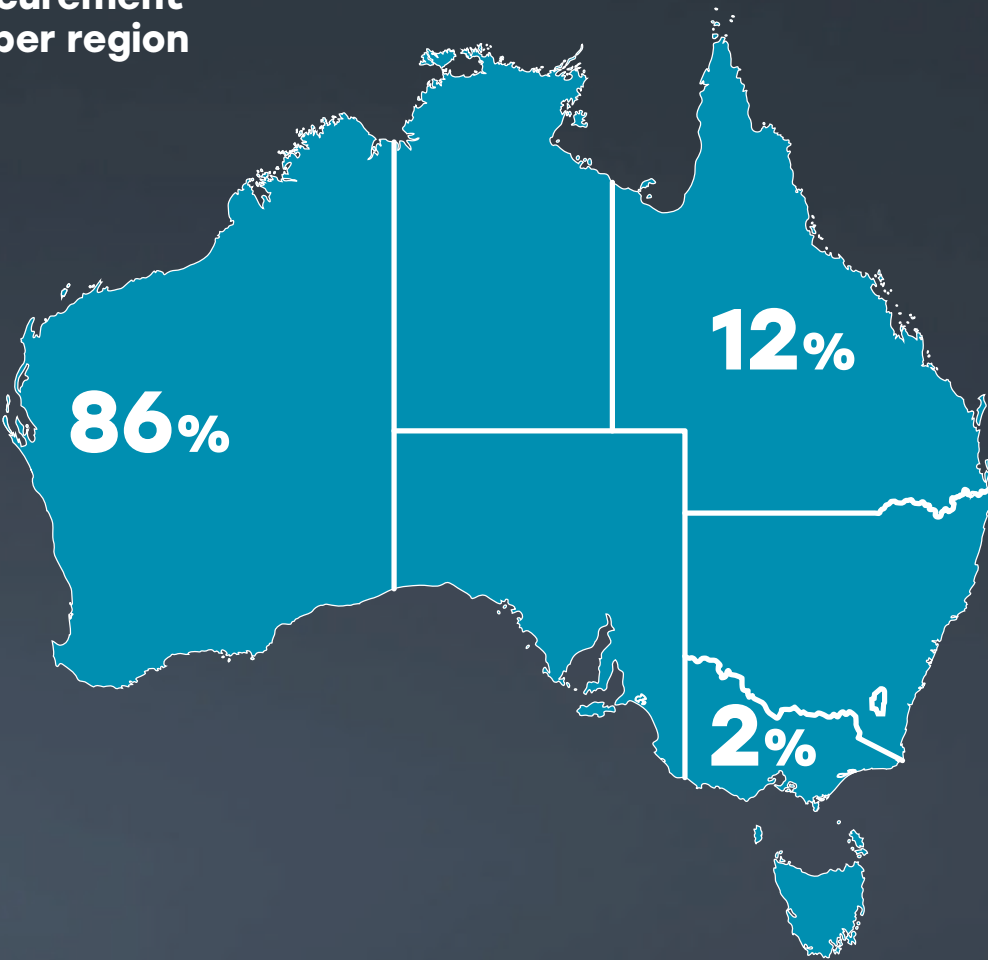


6. Governance Framework

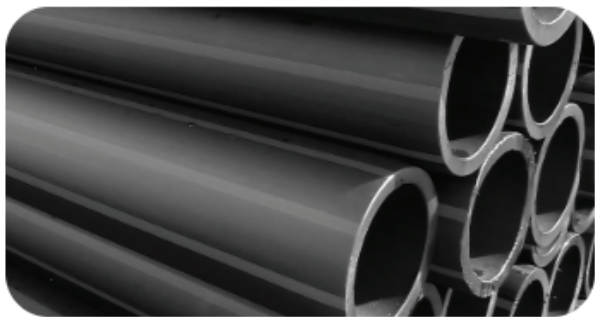
6.3 Value chain



6.4 Procurement spend per region



INDUSTRIES



Plumbing



Irrigataion



Mining



Civil



# 7. Acu-Tech’s Supply Chain Overview

Acu-Tech’s supply chain is an integral part of our business, ensuring that we deliver high quality products and services to our clients across Australia. We are committed to fostering positive social change within our supply chain by actively collaborating with our suppliers. Our approach involves understanding our suppliers’ strategies for managing modern slavery risks and providing necessary support to enhance their efforts. This commitment not only strengthens our relationships but also ensures the integrity and ethical standards of our supply chain.

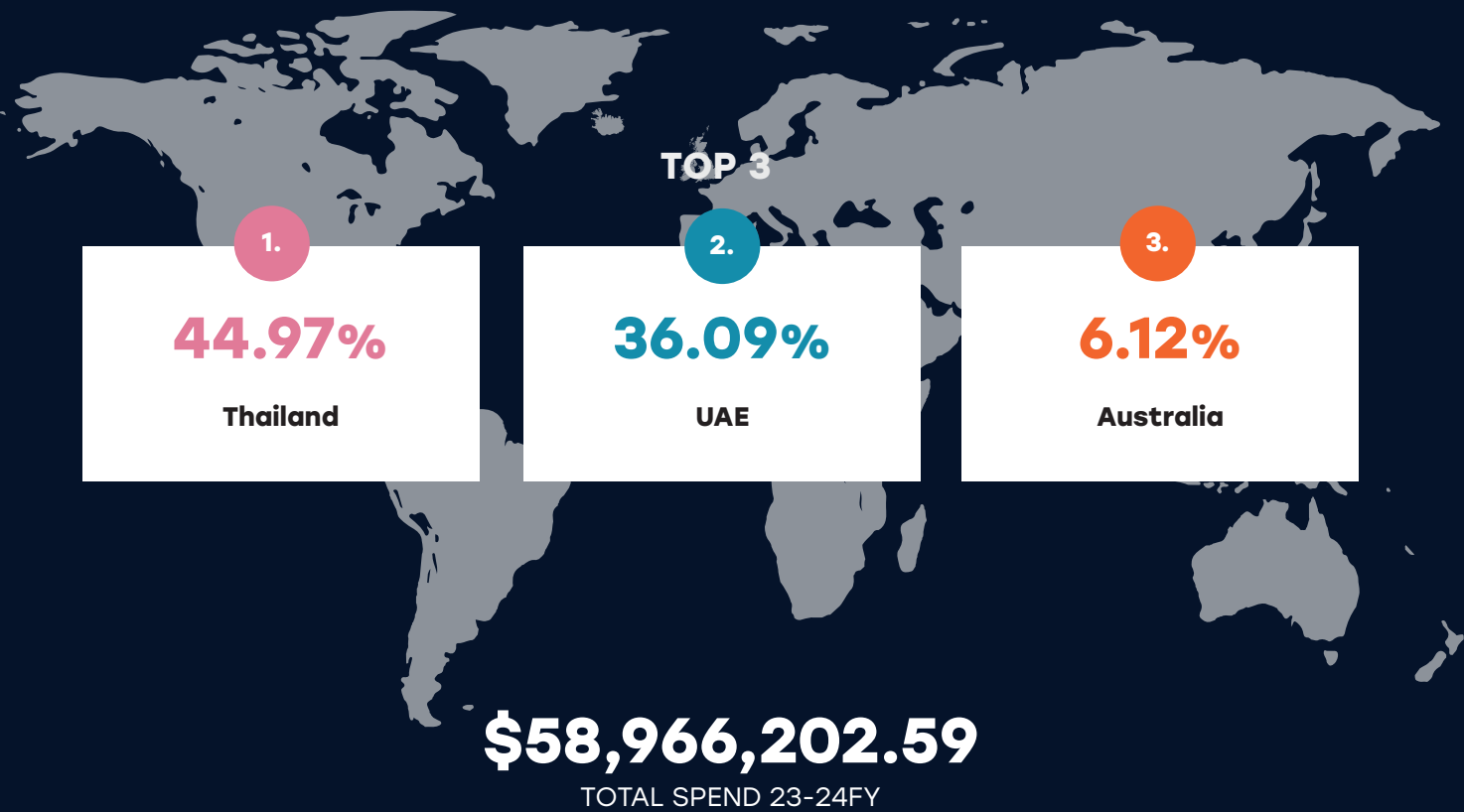
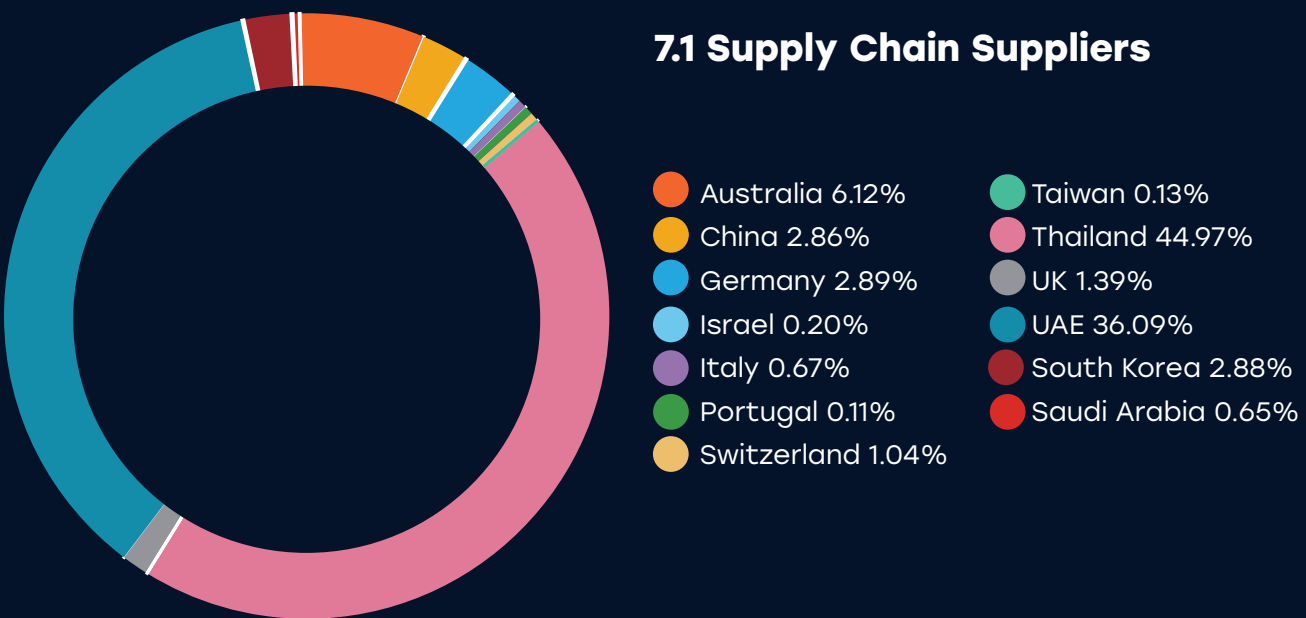
Currently, our supply chain practices focus on transparency, efficiency, and ethical sourcing. However, we recognise the need for continuous improvement and are dedicated to evolving these practices through our Modern Slavery Project. This initiative is aimed at identifying and mitigating modern slavery risks, enhancing supplier engagement, and promoting fair labour practices. Our ambition is to set new standards in supply chain management, ensuring that every link in our chain upholds the highest ethical principles.

## Key Activities for Project

We are dedicated to respecting and upholding the human rights of everyone, including our employees, the communities where we operate, individuals in our supply chains, and others affected by our activities.

We firmly reject and strictly prohibit all forms of child labour, forced labour, and any other type of slavery within both our own operations and those of our suppliers.

We are continually striving to enhance our methods for identifying, preventing, and mitigating impacts on human rights, including risks related to modern slavery.





## 8. Policy Framework

Human rights respect is fundamental to our business operations as Acu-Tech is required to adhere to, or be actively working towards compliance with, the Act and the various contractual obligations associated with Modern Slavery obligations. Guiding our actions are the following policies and standards:

Document	Overview	Policy in action
Code of Conduct	Our Code of Conduct initiates and establishes the standards in the way we operate. It outlines the expected behavior and ethical standards expected of all persons (employees, suppliers or contractors) who work with Acu-Tech.  The set of expectations in the Code of Conduct or in policy format, include human rights and modern slavery.	Accessible by all employees through the company's Acu-Pulse (internal intranet).  Provided to all employees during the on-boarding via their HRMS employee profile.
Supplier Code of Conduct	Our Supplier Code of Conduct establishes the way we expect our suppliers to operate. It outlines the ethical behaviours and standards expected, consistent with International Bill of Rights, human rights and modern slavery requirements.	The Supplier Code of Conduct is provided to all new suppliers during the Supplier Sustainability Assessment phase.  Existing suppliers receive the latests edition of the Supplier Code of Conduct during the process of monitoring and due diligence.
Procurement Policy	Our Procurement Policy communicates clearly and concisely the purpose, framework and structure of our procurement standards to ensuring ethical sourcing, ethics and integrity, including respecting human rights and addressing modern slavery risks.	Our Procurement Policy is available to all employees through our IMS SharePoint. It applies to all procurement activities and operations. It is communicated to all suppliers upon commencement and at each time it is changed. The policy is attached to the SQA process.
Anti-Bribery & Corruption	Our Anti-Bribery and Corruption Policy sets the standard and structure that supports ethical sourcing and includes respecting human rights and addressing modern slavery risks such as 'off the record' or 'bias' contracts.	Our Anti-Bribery and Corruption Policy is available to all employees through our IMS SharePoint. It applies to all activities such as sham or bias contracts that can present modern slavery risks such as placing persons/ parties into unethical contracts or forced decision making. It is communicated to all suppliers and attached to the SQA process.
Modern Slavery Statement	Our Modern Slavery Statement is an internal and external policy document designed to support Acu-Tech's initiative against Modern Slavery and supports Human Rights.	Our Modern Slavery Statement is readily available to all staff through SharePoint IMS. The statement is also posted on our website, freely available to all customers, contractors and suppliers.
Human Rights Policy	<b>Currently under development</b> Our Human Rights Policy details our commitment to conducting business in a manner consistent with the: <ul style="list-style-type: none"> <li>International Bill of Human Rights</li> <li>International Labour Organisations (ILO)</li> <li>United Nations Guiding Principles on Business and Human Rights.</li> </ul>	Our Human Rights Policy will include similar framework as the Modern Slavery Policy, such as due diligence, risk management and controls to mitigate risks.  The policy is due to be rolled out FY25 Q2.

Document	Overview	Policy in action
Privacy Policy	Our Privacy Policy establishes the minimum standard, based on Data Privacy Principles, for the processing of Personal Data across Acu-Tech's operations.  This policy complies with the Company's obligations to protect Personal Data. The policy aims to maintain the trust of the people who share information with us.	Our Privacy Policy is readily available to all staff through SharePoint IMS, and incorporated into employment contracts. The policy supports Human Rights but ensuring we do not use or supply personal information to any parties, unless otherwise required under legislative or consensual means.  Acu-Tech's website includes a separate Privacy statement for all uses of the website.
Inclusion and Diversity Policy	This policy sets out Acu-Tech's expectations around behaviours needed for an inclusive and diverse workplace, including our stance against bullying harassment or discrimination of any kind. We use this policy to support the rights of all workers. This policy is consistent with our Human Rights, Fair Work Act.	Acu-Tech has a specialised Human Rights intranet (Pulse) landing page that includes the Inclusion and Diversity Policy, and is accessible by all staff. The policy is readily available to all staff through SharePoint IMS and their HRMS Employment Hero profiles. All employees are required to acknowledge the policy at onboarding and when it's updated. Details on how to report a concern is included on the policy, Code of Conduct and Supplier Code of Conduct.
Workplace Bullying and Harassment Policy	This policy outlines our stance against bullying and harassment of any form and applies to all aspects of our operations. We seek a culture based on respect, dignity and fair treatment as a daily reality for everyone who works with us, therefore employees are offered various reporting methods and can remain confidential. This policy is consistent with our Work Health and Safety (WHS), Human Rights, Fair Work Act, Fair Work Legislation Amendment (Secure Jobs, Better Pay) and Sex Discrimination Act, in support of the protection against modern slavery.	Acu-Tech has a specialised Human Rights intranet (Pulse) landing page that includes the Workplace Bullying and Harassment Policy, and is accessible by all staff. The policy is readily available to all staff through SharePoint IMS and their HRMS Employment Hero profiles. All employees are required to acknowledge the policy at onboarding and when it's updated. Details on how to report a concern is included on the policy, Code of Conduct and Supplier Code of Conduct.
Whistle blower Protection Policy	Our Whistleblower Protection Policy is crucial to the reporting mechanism for raising Modern Slavery or Human Rights concerns, so that the reporting person/s can feel safe in expressing their concerns.	Acu-Tech has a specialised Human Rights intranet (Pulse) landing page that includes the Whistleblower Protection Policy and Human Rights Policy, and is accessible by all staff. The policy is readily available to all staff through SharePoint IMS. Details on how to report a concern is included on the policy, Code of Conduct and Supplier Code of Conduct.
Supplier Standard Contract Terms and Conditions	Our Supplier Standard Contract Terms and Conditions include the means for Acu-Tech to to investigate and assess our modern slavery risks and conduct due diligence and remediation programs.	Acu-Tech's Supplier Standard Terms and Conditions is available on our website and is provided to suppliers during vendor SQA and setup. Suppliers are issued a purchase order to authorise the provision of goods and services. We also encourage our Suppliers to implement similar clauses in their terms and conditions.
Modern Slavery Procurement Procedure	<b>Currently under development</b> The Modern Slavery Procurement Procedure (MSPP) is being developed to support the implementation of our Modern Slavery framework, Human Rights Policy and Procurement Policy by detailing the specific processes for our Procurement practices in assessing and managing modern slavery risks within our supply chain.	The MSPP is currently in development and will be rolled out early 2025 by the National Purchasing Manager. New suppliers and due diligence processes currently conduct vendor screening practices as per the drafted MSPP. Training was provided to all personnel undertaking Procurement activities.
Grievance Procedure	<b>Currently under development</b> Our existing Grievance Procedure is in review to include all Modern Slavery, Human Rights and Whistleblower Protection considerations. The procedure's purpose is to ensure internal and external stakeholders can access a locally appropriate mechanisms to raise grievances.	The Grievance Procedure is currently in development and will be rolled out FY25 Q3, by the Corporate Service Manager. Currently all Grievance processes are conducted as per the drafted procedure. Training was provided to all employees through HRMS (Employment Hero).



# 9. Risk Management

## 9.1 Overview

Modern slavery, defined under the Act as including slavery, forced labor, debt bondage, servitude, deceptive recruiting practices, human trafficking, and severe forms of child labor, potentially presents a significant risk within our supply chain. Identifying, assessing, and addressing these risks is not only a regulatory requirement but also a moral imperative that aligns with our commitment to ethical business practices and our corporate values and culture.

To effectively manage these risks, Acu-Tech adheres to the United Nations Guiding Principles on Business and Human Rights. These principles provide a robust framework for understanding the potential impacts of our business activities. By applying these principles, we actively evaluate how our operations may cause, contribute to, or be directly linked to modern slavery. This critical analysis helps us develop targeted strategies to mitigate these risks across all aspects of our business and supply chain.

Outlined below are the specific ways in which we integrate these concepts into our operations, ensuring our practices do not inadvertently support or engage in modern slavery.

### Cause

A company can instigate human rights violations or modern slavery through its direct actions or failures to act. For instance, the use of forced labor in its manufacturing facilities, worksites, or broader operational activities can be such examples

### Contribute

A company can indirectly facilitate human rights violations or modern slavery through its practices or neglect. For example, if a company demands overly aggressive cost reductions or swift production timelines, it may unknowingly encourage suppliers to meet these demands through exploitative labor practices. Similarly, by insisting on the cheapest possible labor without scrutinising the conditions under which it is obtained, a company may inadvertently support harmful labor practices

### Directly Linked

A scenario in which a company has not directly caused or contributed to a violation of human rights or modern slavery, but is connected to such an incident through its business relationships. This occurs when an adverse impact or instance of modern slavery is perpetrated by an entity that the company is involved with, due to their mutual business activities, products, or services. For instance, a company may purchase goods from a manufacturer that, in turn, obtains raw materials from a supplier engaging in forced or child labor.

## 9.2 Country Risk

Country risk plays a pivotal role in modern slavery risk management, as the likelihood and nature of modern slavery incidents can significantly vary from one region to another.

Understanding the specific risks associated with each country where a company operates or sources its materials is essential for effective risk assessment and mitigation. Factors such as local labor laws, enforcement effectiveness, economic stability, and cultural norms influence the prevalence and type of modern slavery. By thoroughly assessing country risk, Acu-Tech can tailor its strategies and processes to address the unique challenges posed by different geographical areas, thereby enhancing their overall approach to preventing modern slavery within their supply chains and operations.

As set out in section 7.1 Acu-Tech sources goods and service from a number of regions.

## 9.3 Industry/Product Risk

Industry and product-specific risks are critical dimensions of modern slavery risk management, as certain sectors and types of products are more susceptible to modern slavery practices than others. Industries such as textiles, agriculture, electronics, and mining often present higher risks due to labor-intensive production processes and complex global supply chains.

Understanding this aspect of risk assessment is essential for Acu-Tech to develop targeted strategies that address potential vulnerabilities within its specific industry and supply chain context.

## 9.4 Entity Risk

Entity risk plays a crucial role in modern slavery risk management, considering the unique characteristics and operations of entities such as subsidiaries, joint ventures, and suppliers. The risk assessment of each entity takes into account factors like historical human rights performance, governance structures, and ownership details—whether publicly listed, stateowned, or privately held etc. These factors are indicative of the entity’s transparency and its responsiveness to stakeholder expectations regarding human rights.

By carefully evaluating these elements, Acu-Tech can identify potential vulnerabilities and establish tailored strategies and processes to effectively mitigate modern slavery risks across their operations or through its supply chain interactions.

This proactive approach ensures all parts of the business align with broader human rights commitments, reinforcing ethical practices and promoting a culture of compliance.



# 9. Risk Management

## 9.5 Spend Focus

In our approach to modern slavery risk management, we prioritise the assessment of larger and critical suppliers, where our influence is more substantial, although spend itself does not directly dictate modern slavery risk.

To guide our assessment, we utilise our risk management framework so that each supplier is assigned a risk score based on a weighted criterion that includes factors such as accreditation, size, and reliability. These scores serve as indicators of potential involvement in modern slavery but are not definitive evidence of such occurrences.

Risk scores are subject to manual adjustments through a ‘sense check’ process and crossreferenced with additional risk assessment processes. For instance, if allegations of modern slavery are associated with a specific product, we may temporarily elevate the risk score pending further investigation. Any adjustments are restricted to authorised personnel, and all justifications are meticulously documented.

Suppliers identified as high-risk undergo further scrutiny as set out in section 11. This includes additional due diligence, and if the elevated risk persists, we may impose special conditions such as mandating an independent audit. The audit findings are then reviewed by Acu-Tech. In cases where the risks are deemed unmanageable, we disengage with the supplier.

Continuous monitoring is integral to our strategy, enabling us to identify and respond to new risks or issues as they arise. High-risk suppliers or new concerns trigger further investigations to ensure ongoing compliance and risk mitigation.



## 9.6 The role of due diligence & continuous improvement in managing risk

Due diligence is a critical process for businesses to identify, prevent, and mitigate any legal, financial, and reputational risks associated with their operations and business relationships. In the context of modern slavery and human rights, due diligence becomes even more crucial. It ensures that companies are not unwittingly complicit in human rights abuses and helps them to maintain ethical practices throughout their supply chains. This continuous and iterative process not only aligns companies with legal compliance but also supports sustainable business practices and enhances corporate accountability.

Similarly, continuous improvement is an integral part of the due diligence process, emphasising the need for ongoing enhancement of strategies and methods to manage risks effectively. This approach involves regularly updating and refining due diligence practices to reflect new insights, changing contexts, and stakeholder feedback. By embracing a mindset of continuous improvement, Acu-Tech can better adapt to emerging challenges and ensure that their efforts in mitigating modern slavery and protecting human rights remain effective and relevant. This dynamic approach encourages innovation, enhances adaptability, and strengthens the overall resilience of a company’s operations and supply chains against human rights abuses.

Set out in the table below are the key steps associated with the due diligence and continuous improvement processes.

Step	Description	Key Activities	Purpose or Outcome
1	Identification and assessment	Risk Identification, Stakeholder Engagement, Impact Assessment	To pinpoint potential risks and areas of concern in operations and business relationships
2	Awareness and prevention	Training Programs, Policy Development, Preventative Strategies	To raise awareness within the organization and implement strategies to prevent risks
3	Monitoring and Communication	Regular reviews, reporting mechanisms, transparency	To continuously monitor the effectiveness of implemented strategies, processes and systems to maintain open lines of communication
4	Continuous Engagement and collaboration	Stakeholder dialogues, partnership building, feedback loops and audits	To engage continuously with all stakeholders and adapt strategies, processes and systems based on feedback, evolving contexts and legal and contractual compliance needs

The above steps provide a structured approach to understanding the critical phases of the due diligence process. Each step is vital for ensuring that the company operates ethically and complies with modern slavery laws and human rights obligations as well as its contractual obligations with clients. Through this process, Acu-Tech can create, implement and maintain a foundation for ethical practices that are sustainable and deeply integrated into the business processes and operations.



# 9. Risk Management

## 9.7 Operational Risks

Our operational risks go beyond our suppliers, and we take a proactive approach to analysing the risks and applying appropriate action.

Community Rights	Fostering good relationships between Acu-Tech and its internal and surrounding communities.
First Nations peoples' rights	Putting in motion our Innovative Reconciliation Action Plan (RAP) Strategy, and ensuring our actions do not negatively impact First Nations peoples, traditional lands and cultural heritage.
Environmental Risks	Undertaking ISO14001 accreditation to reduce environmental risks resulting from our operational activities.
Inclusion and Diversity Risks	Implementing policy and practices that protect our workers and any persons which relate to our operations from discrimination or bias, creating an equal and fair workplace.
Labour rights	Engaging with SMEs and having access to legal council to ensure our practices and legal framework does not breach the rights of our workers, protecting them from modern slavery through proper management of working hours, compliant employment contracts and conditions, equal pay and freedom of association, etc.
International labour rights	Undertaking rigorous supplier assessment qualification processes and due diligence across the international supply chain. Providing material and training to suppliers so they can understand and comply with human rights and modern slavery standards. Enact the remedial action process for any identified risk or non-conformance.
Remotely located sites	Establishing consistent structures and practices and monitoring, leaving no room for unethical behaviours
Workplace health and Safety	Undertaking ISO45001 accreditation to protect our workers from our operational activities and decision making by creating a safe and healthy working environment.



# 10. Risk Management Framework

In our commitment to uphold human rights and combat modern slavery within our operations and supply chains, the implementation of a robust risk management framework is paramount.

This framework is crucial not only for identifying and assessing potential risks but also for ensuring systematic and proactive responses to these challenges. A comprehensive risk management framework allows our company to maintain high ethical standards, fulfill legal obligations, and uphold our corporate social responsibilities.

Below are the key components that constitute our risk management framework for modern slavery risks:

- **Risk Identification:** Systematically identifying areas of potential risk within operations and supply chains.
- **Risk Analysis and Assessment:** Evaluating the nature and extent of identified risks to prioritize actions.
- **Mitigation Strategies:** Developing and implementing strategies aimed at mitigating identified risks.
- **Monitoring and Reporting:** Regularly monitoring risks and the effectiveness of mitigation strategies, coupled with transparent reporting mechanisms.

- **Review and Revision:** Continuously reviewing and updating the framework and strategies based on outcomes and evolving contexts.
- **Stakeholder Engagement:** Involving relevant stakeholders, including suppliers, employees, and community representatives, in risk assessment and management processes.

These components ensure a thorough approach to managing modern slavery risks, facilitating both compliance with legal standards and the promotion of ethical business practices.





# 11. Supplier Due Diligence

Supplier due diligence is a critical component of a company’s risk management strategy, especially in combating modern slavery and ensuring compliance with ethical standards throughout the supply chain. This process involves several key steps designed to assess, monitor, and enhance the compliance and performance of suppliers with respect to human rights and labor standards.

Item no	Step	Description of activity
1	Supplier Identification and Screening	This initial step involves identifying potential suppliers and conducting preliminary assessments based on their reputation, past performance, and risk factors related to modern slavery
2	Risk Assessment	Detailed risk assessments are conducted to evaluate specific risks associated with each supplier. This may include the geographical location, the nature of the business, and known issues in similar industries or regions
3	Auditing and Verification	Conduct thorough audits, either internally or by third-party auditors, to verify supplier compliance with company standards and legal requirements. This includes reviewing their operational practices, employment records, and other relevant documents
4	Contractual Agreements	Ensuring that contracts with suppliers include clauses that mandate compliance with human rights laws and the company’s own ethical standards. This also involves clear stipulations for non-compliance
5	Training and Capacity Building	Providing training and support to suppliers to help them understand and implement the necessary compliance measures. This may include workshops, resources, and ongoing support to improve their practices
6	Ongoing Monitoring and Communication	Regularly monitor the suppliers’ practices through follow-up audits, reports, and communications to ensure ongoing compliance. This step helps to identify any new risks or non-compliance at an early stage
7	Reporting and Remediation	Establish clear mechanisms for reporting violations and addressing noncompliance. This includes corrective action plans and, if necessary, terminating relationships with suppliers who consistently fail to meet standards.
8	Continuous Improvement	Encourage and support suppliers in making continuous improvements in their operations to better protect human rights and prevent modern slavery

Implementing a comprehensive supplier due diligence process is essential for Acu-Tech as it is committed to responsible sourcing and ethical business practices. It not only helps in mitigating risks but also strengthens the overall integrity and sustainability of the supply chain.

# 12. Grievances Management

## 12.1 Monitoring

Our thirst for learning, energy for innovation and dedication to continuous improvement fuels our drive to monitor our supply chain and the management of concerns, reports and any modern slavery related risks and breaches raised.

While our due diligence program is specifically designed with our suppliers in mind, we also utilise our engagement and long standing relationships we have with our suppliers to identify risks, opportunities and collect additional information that may pose Modern Slavery risk. Any concerns are recorded onto the due diligence register and managed as per our Remedial procedure.

## 12.2 Risk Management Planning

Our Risk Management planning is developed collaboratively between the Modern Slavery Committee and Purchasing management. The team review the existing Risk Register and due diligence results to determine future risk management strategies, and manage those who are not or have the potential to fall below acceptable standards.

For the period FY2024, there were no instances of concern during the review process. Acu-Tech will continue to monitor our suppliers diligently.

Suppliers who are identified as a risk will be required to respond to our Remedial action or be terminated.

## 12.3 Management Review

In the FY2025 period Acu-Tech held it’s first Modern Slavery management review.

The management review included the approval of the Supplier and Operational Risk Registers, Policies and Framework, Modern Slavery Statement draft.

The management review also saw the development of Acu-Tech’s FY2025 Modern Slavery future actions and continuous improvement.



## 12. Grievances Management

### Reporting Concerns



#### 1 Concern Raised

You've had a discussion with your direct manager/HR/Culture Manager to explain what has happened and provided specific examples. You then followed up with a written statement or email.



#### 2 Internal Review & Investigation

There will be an internal investigation around the issue(s) raised by interviewing others who are involved and any relevant evidence such as emails or messages to understand the situation fully.



#### 3 Resolution & Feedback

After investigation concludes an outcome will be communicated to you to reassure that your concern was taken seriously and that steps were taken to prevent further incidents.



#### 4 Follow Up and Maintain

There will be a follow up with you after a few weeks to ensure that the situation has improved and to check if there are any further concerns.



REMEMBER:

Your voice matters & support is available



### 12.4 Grievance Mechanisms and Remediation

Acu-Tech prides itself on the collaborative and communicative culture we have developed. Thus so, we provide employees, contractors and third parties various methods to raise or voice concerns. Our Code of Conduct and Supplier Code of Conduct clearly outline the mechanisms or reporting or raising concerns, and includes the how concerns are managed.

We encourage and provide a safe and anonymous methods for raising concerns of modern slavery and human rights abuses, suspected or actual illegal activity and breaches of Company policies, including our Code of Conduct.

We have a dedicated People and Culture Manager to communicate these safe methods, to build confidence in the company's acceptance of these types of matters.

We demonstrate commitment to providing access to remedial action through effective grievance mechanisms and will provide for, or cooperate in, remediation where we identify that we have caused or contributed to modern slavery.

### 12.5 Whistleblower Processes

In FY2024 we have established our Whistleblower infrastructure, in addition to Raising Concerns and grievance mechanisms.

Our Whistleblower mechanisms include:

- confidential reporting and the choice to remain anonymous
- QR code reporting
- email to a confidential email (concerns@acu-tech.com.au or whistleblower@acu-tech.com.au)
- directly call our Whistleblower Protection Officer

The appointment of our Whistleblower Protection Officer ensures a safe, secure, confidential, method of reporting such concerns for internal and external parties

In the instance the concern or report raised has the potential to be serious breaches such as bribery, corruption, conflict of interest, fraud, theft, serious misconduct, dishonesty, dangers to the public or financial system, or improper state of affairs. The Whistleblower Protection Officer will appoint a third party to assist with the matter independently.

A summary of reports, which excludes personal data and protects the identities of the persons submitting concerns or reports are reported to the Modern Slavery Committee. Serious reports are also reported to the Board.

All potential human rights and modern slavery concerns or allegations received are investigated.

We publish our Whistleblower contact information on our website at [www.acu-tech.com.au](http://www.acu-tech.com.au)

Our grievance mechanisms are promoted through our Code of Conduct, training programs, in FY2025 it will be posted on our internal Pulse website, posters in work areas and dedicated website landing page will be developed to provide access for internal and external parties.

During the reporting period of FY2024, there were no modern slavery related complaints/ concerns through our Whistleblower Protection platforms.

#### SPEAK UP: How to report Ethical Concerns

Ethical concerns should be reported to our Whistleblower Protection Officer, Kevin Wiberley (concerns@acu-tech.com.au / 0488 200 790).

If you are more comfortable reporting it to another employee, we encourage reporting to a manager who is not related to the matter of concern. In some instances it might be appropriate to report the concern to an external body, such as:

- Local police
- Australian federal police (AFP)
- Australian Securities and Investments Commission (ASIC)
- Australian Prudential Regulation Authority (APRA)

Ethical concerns are treated confidentially and will be investigated in a timely manner as per our Whistleblower Report & Investigation Procedure.



Whistleblower Protection Officer



Acu-Tech/Whistleblower.com.au



Concerns@acu-tech.com.au



## 13. Consultation

### 13.1 Engagement

We cite ‘we care’, we demonstrate this through our commitment to Modern Slavery by engaging with our stakeholders, including suppliers, regulatory authorities, clients, community and industry peers.

Engagement is developed through various means, such as direct contact communication, industry opportunities (expos/seminars), registries, social media posts and website content. We have included Modern Slavery into dialogue throughout FY2024 and by establishing our Modern Slavery engagement practices.

FY2025 our website will possess a dedicated landing page which will outline our commitment and plan of action. The landing page will demonstrate to all key stakeholders we care about upholding and respecting Human Rights and communicating our position on Modern Slavery.

### 13.2 Collaboration

We collaborate with a number of organisations on the matters of modern slavery and human rights. We align ourselves with peers, suppliers, community, industry partners and clients who support these initiatives. As part of our continuous improvement, we utilise the information collected and shared to feed it back into the Modern Slavery management reviews and due diligence processes.

### 13.3 Training

In establishing our Modern Slavery frame work we have provided training and information to our procurement team and suppliers throughout the due diligence process.

In FY2025 Acu-Tech will be rolling our specialised Modern Slavery training, as part of the training course participants will be required to complete an assessment. The expected outcomes of the training include:

- being able to identify what modern slavery and human rights are
- build an understanding how they can contribute to respecting human rights in the workplace
- how modern slavery can be hidden or unintentional how to identify unintentional acts of modern slavery
- building an understanding of our obligations regarding human rights and modern slavery
- the mechanisms to report concerns or breaches in modern slavery or human rights

Following the training program we will survey participants to gain their feedback on the training for our continuous improvement process.

## 14. Assessing our effectiveness

We are committed to continuously Modern Slavery program to identify, assess and manage risks and advance the human rights of workers in our operations and supply chains.

Our commitment is demonstrated through the supplier due diligence processes and enables us to improve the effectiveness of our collaboration with our suppliers. In particular, we are hopeful that promoting worker voice mechanisms, such as the SQA, Raising Concerns and Whistleblower Protection, will allow for credible feedback on the effectiveness of our mitigation measures with key suppliers.

FY2024, is the first period of measuring the effectiveness of our supplier due diligence process. Used our existing Internal Auditing resources to evaluate and improve the effectiveness of our actions. Thus this formed the structure for future monitoring:

- reviewing the output of our supplier due diligence screening and risk rating against documented policy, procedure and relevant Acts
- reviewing gathered feedback, excludes Whistleblower feedback, on the content provided to suppliers
- reviewing the content and structure of the due diligence process to ensure compliance and thorough risk assessment
- conducting an annual review of the Procurement Framework to ensure it accurately documents our approach, standards and controls for assessing and addressing modern slavery risks in our supply chains
- reviewing the non-conformances, related to breaches, process inefficiencies or opportunities for improvement were assessed and associated immediate actions, root-cause analysis and improvement actions put in place
- reporting Internal Audit findings to the Modern Slavery Committee, including reporting any non-conformances or suspected/confirmed breaches
- identifying opportunities to further develop Acu-Tech’s Modern Slavery program and associated Human Rights compliance
- tracking and monitoring internal performance metrics such as measuring efficiency and development of contracts/templates to possess enhanced modern slavery-related requirements
- engaging with external SME or specialist for legal and best practice guidance and benchmarking materials



# 15. Continual Improvement and looking ahead

Looking ahead into FY2025, we expect to achieve the following updates and initiatives that supports human rights and our modern slavery commitments.

Identification and assessment	<ul style="list-style-type: none"><li>• reduce risks associated with contracted or agency staff</li><li>• develop the modern slavery, human rights and whistleblower landing page on our website and internal Pulse intranet</li></ul>
Awareness and prevention	<ul style="list-style-type: none"><li>• implement specialised Modern Slavery and Human Rights training to employees and suppliers</li><li>• implement and train employees and suppliers on our Code of Conduct</li></ul>
Monitoring and Communication	<ul style="list-style-type: none"><li>• Formalise our Human Rights policy; Modern Slavery</li><li>• Procurement procedure; Grievance Procedure</li><li>• Review and assess KPIs and targets to ensure due diligence effectiveness</li><li>• Review all policies and procedures related to Modern Slavery and Human Rights to ensure best practice and compliance is maintained</li></ul>
Continuous Engagement and collaboration	<ul style="list-style-type: none"><li>• Improve feedback processes for due diligence, training and risk management initiatives</li><li>• Update our Innovative Reconciliation Action Plan (RAP) Strategy and communicate the updates to our key stakeholders and on the website</li></ul>







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