

# Modern Slavery Policy



## SCOPE

HQPlantations respects and seeks to uphold the human rights of all individuals. In line with society's expectations globally that individuals and corporate entities take social responsibility into account in the course of conducting their business, HQPlantations supports the aim of the *Modern Slavery Act 2018* (Cth) (Act) to require certain entities to report publicly on the risks of modern slavery within their operations and supply chains.

"Modern Slavery" is a term that describes serious exploitative practices which occur in a variety of forms for commercial or personal gain. There are eight types including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour, as defined in the Act. The worst forms of child labour means work where persons under the age of 18 are subjected to slavery or similar practices, or engaged in hazardous work (for example that jeopardises their physical, mental or moral wellbeing).

While these crimes all have different elements, the common factor is that they can all result in the serious undermining of an individual's personal freedom and ability to make choices for themselves. Indicators of modern slavery may include underpayment or withholding of wages, excessive overtime, unfair recruitment fees, confiscation of passports or identity documents, restriction on freedom of movement and association, unsafe working environments, unsuitable living conditions and limited access to food and healthcare. It may also involve physical threats or psychological coercion. By nature and definition, Modern Slavery practices are serious crimes that fundamentally curtail freedom, making them grave violations of human rights.

HQPlantations will comply with all relevant laws and regulations regarding Modern Slavery, and is committed to eliminating as best as possible the risk of Modern Slavery within its business and supply chains. HQPlantations has zero tolerance towards any form of Modern Slavery and seeks to collaborate with its suppliers to identify and address these risks.

## APPLICATION

Modern Slavery is a global issue and can occur in any country. Recognising that modern slavery could exist in HQPlantations' supply chain, this policy applies to all persons working for, or on behalf of, or providing services to, HQPlantations, including all directors, employees, contractors and suppliers.

HQPlantations expects that all who have, or seek to have, a relationship with HQPlantations will familiarise themselves with this policy and act in a way that is consistent with its values.

HQPlantations aims to conduct business only with contractors and suppliers who fully comply with the principles enshrined in the Act being those principles that are also advanced by this policy.

## HQPLANTATIONS' COMMITMENT

HQPlantations is committed to promoting ethical labour practices, upholding human rights, and ensuring the wellbeing of all individuals. All work conducted with HQPlantations is conducted freely.

HQPlantations operates with absolute integrity to ensure that it conducts its business according to sound socially responsible practices which include the absence of human rights violations including Modern Slavery. HQPlantations verifies documents for all employees to confirm they are allowed to work according to legal standards (including an age verification). Holding an employee's original identity or immigration documents is strictly prohibited.

In circumstances where an external recruiter or labour hire firm is engaged, they must ensure that they comply with all relevant laws and not charge any recruitment or placement fees to applicants.

HQPlantations is committed to providing appropriate working conditions for all employees, in accordance with their physical and intellectual capabilities and development.

To the extent that any housing is provided or arranged for workers HQPlantations will ensure they meet the relevant housing and safety standards.

HQPlantations is committed to ensuring that there is no discrimination and harassment in any of its recruitment and engagement processes, and during and following employment. HQPlantations will comply with all relevant anti-discrimination laws.

Employees can terminate their work contracts at any time with no financial penalty, subject to giving reasonable notice in accordance with relevant laws and their individual contract or collective bargaining agreement.

HQPlantations respects its employees, stakeholders and the environment and does not engage in, or tolerate any exploitation or involuntary servitude. All workers have the right to choose whether to form or join trade unions, to bargain collectively, and to engage in peaceful assembly in conformance with all relevant laws.

HQPlantations conducts risk assessments to determine which areas of its supply chain are most at risk of Modern Slavery offences, and continues to seek to identify and assess risks of Modern Slavery on an ongoing basis through its procurement processes. Where new risks are identified, HQPlantations will implement risk elimination strategies.

Where HQPlantations is made aware of Modern Slavery practices within its own business or within its supply chain, it will act with responsibility and accountability by investigating all claims, and, if valid, resolve the issue in line with this policy.

HQPlantations aims to continuously review and improve its governance, systems, processes and capability to better identify, assess and address modern slavery risks. Consistent with the principle of continuous improvement, HQPlantations will review its contractors and suppliers

regularly to ensure that any risk of Modern Slavery is progressively eliminated, allowing HQPlantations to perform better tomorrow than it performed today.

## SUPPLY CHAIN

HQPlantations expects its contractors and suppliers to have similar values to HQPlantations in relation to Modern Slavery and exercise appropriate due diligence to identify and manage the risk of Modern Slavery in its business and supply chains.

HQPlantations includes anti-slavery obligations in relevant contractor and supplier contracts. Contractors and suppliers must take reasonable steps to ensure that there is no Modern Slavery in its operations and supply chains, and notify HQPlantations as soon as they become aware of any actual or suspected Modern Slavery activities.

## REPORTING CONCERNS

If a person suspects there is a risk that HQPlantations or a contractor or supplier to HQPlantations is engaging in Modern Slavery, the individual should notify their concern by:

- contacting us in person or by phone at any HQPlantations office;
- submitting your details using the Contact Us page on our website; or
- emailing [information@hqplantations.com.au](mailto:information@hqplantations.com.au).

Reports by HQPlantations current employees, officers, contractors, suppliers, associates and other eligible disclosers (including former employees and family members of any of these people) can also be made through HQPlantations' Whistleblower Protection Policy and will be afforded the protections under the whistleblowing laws and that policy.

## HQPLANTATIONS' RESPONSE

All reports will be investigated by HQPlantations. HQPlantations will seek to achieve a satisfactory outcome reflecting the principles of this policy, and the investigation and its outcome will be appropriately documented.

Where an investigation identifies a contractor or supplier engaging in Modern Slavery, HQPlantations will request evidence of controls and remedial actions taken by the contractor or supplier and will work with them to come to an agreement on how best to proceed and promptly correct the situation. The corrective action plan will consider victim remediation in the short-term as well as longer term objectives such as the factors that contributed to the situation and systems to prevent it from reoccurring.

Where appropriate, HQPlantations will report the situation to the relevant law enforcement agency. HQPlantations may also consider terminating the relationship with the contractor or supplier, however it will consider the needs of the victims and other potentially affected workers before doing so. Any actions taken will be adapted to the specific circumstances to ensure the highest protection for victims and affected workers.