

# Modern Slavery Policy

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## Revision history

VERSION	DATE	REVISION AUTHOR	SUMMARY OF CHANGES
1.0	24/06/2012	PR/SP	Initial Release
2.3	12/01/2021	JB/TH	Review and Update
3.0	12/09/2023	SP/TH	Re-Write

## Approval

NAME	POSITION	DATE
JB	ISO Manager	24/06/2012
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SP	CIO	12/09/2023

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## 1 Introduction

LeBLANC Pty Limited ("LeBLANC") ABN 53 008 982 536 is one of Australia's leading engineering services provider whom acknowledge that all businesses have an obligation to prevent slavery, slavery-like practices and human trafficking and will do all in its respective power to prevent slavery, slavery-like practices and human trafficking within its business and within the supply chains through which it operates.

This statement addresses LeBLANCs' obligations and compliance in relation to the 'Modern Slavery Act 2018 (Cth)' ('the Act') and applicable state legislation and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organisation or its supply chains. One of our company's most valuable assets has always been its reputation for integrity and fairness. Maintaining this reputation within our market is an essential pre-requisite to our continued success.

Modern slavery can take many forms including the trafficking of people, forced labour, child labour, servitude and slavery. We take our responsibility seriously and are aware of the potential for being targeted by traffickers and unlicensed labour hire providers, in local jurisdictions where licensing is not a requirement. Our own processes around candidate engagement ensure our employees are alert to the signs of exploitation, so that we may take the necessary action promptly and effectively should it be identified. Sectors affected include, but are not limited to, construction & property, engineering & manufacturing and health & social care.

## 2 Suppliers to LeBLANC

We contract with third parties who provide services to assist with the everyday running of our business, such as manufacturing entities, installation partners and ICT services.

We acknowledge that by virtue of contracting with other parties, whether as a client or as a supplier, there is always some risk that may contribute to modern slavery practices. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner by adhering to the LeBLANC Code of Conduct. We also expect our suppliers to promote similar standards in their own supply chain.

## 3 Actions taken to assess and address modern slavery risks

### 3.1 Candidate engagement

LeBLANC strives to attain appropriate compliance checks are carried out for all candidates it supplies. We verify the identity of each worker and their right to work before supply commences. We engage a legal firm to assess the relevant modern award or enterprise agreement that a worker is engaged under to ensure they are paid correctly in accordance with the relevant award or agreement.

As part of our commitment to identify and eradicate slavery and human trafficking and to continuously assess and address modern slavery risks, we have in place a process to undertake due diligence on our supply chain network to ensure compliance with legislative obligations, and such compliance forms part of our contractual relationship with suppliers. We will use best endeavours to procure from our suppliers by contract that full compliance with the Act must be achieved. We will use best endeavours to separately require that any actual or potential risk of breaching the Act that suppliers identify in their own operations or supply chains are

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communicated to us. This information will be assessed and evaluated appropriately by senior members of LeBLANC on an ongoing basis.

### 3.2 Supplier Code of Conduct

LeBLANC created a Supplier Code of Conduct that is relevant to all suppliers to LeBLANC. Suppliers are expected to adhere to the LeBLANC Code of Conduct, which includes specific reference to various matters including human rights, anti-bribery and corruption, and modern slavery and human trafficking, and suppliers should have in place a policy recognising, respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations.

LeBLANCs' position, which is mirrored in its Supplier Code of Conduct, is that:

Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.

All employees must be provided with a clear contract of employment, which complies with local legislation.

All employees must be treated in a fair and equal manner and with dignity and respect.

Any form of discrimination, victimisation or harassment on any prescribed grounds under commonwealth, state or territory laws should be prohibited. This includes marital status, pregnancy, family responsibilities, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, religious belief, age, trade union activity or any other prescribed ground

All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions.

All slavery and human trafficking laws must be complied with including, but not limited to, the provisions of the Act and any applicable state legislation. Suppliers must assure their business operations are free from slavery and human trafficking practices whether in Australia or elsewhere, both internally and within their supply chains and other external business relationships.

### 3.3 Cooperation with client due diligence.

Our clients in the private sector operate in many industries and range in size from small businesses through to local subsidiaries of global groups. We also work closely with government departments and agencies across all jurisdictions.

### 3.4 Ability for employees to raise concerns at Work

All LeBLANC employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through whistleblowing procedures. LeBLANC is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in compliance with whistleblowing procedures will be treated confidentially and without fear of retaliation. It is by receiving and evaluating feedback and maintaining a culture of compliance that LeBLANC can assess the effectiveness of its practices and procedures.

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### 3.5 Training

All staff within LeBLANC are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. We have undertaken to review our policies and procedures to ensure our colleagues have access to any additional information and support they may require with regard to human trafficking, forced labour, child labour, servitude and slavery. All relevant employees in Australia will undertake training on modern slavery and human trafficking and this training is available to all employees to undertake.

## 4 Ongoing Assessment of the effectiveness of the actions taken

We will undertake continuous and ongoing assessment of our supply chains by evaluating information that we receive from our suppliers and to promptly act on allegations or findings of involvement in such practices.

We will also set up an annual review process whereby members of senior management will review our policies and procedures and our response to modern slavery.

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