

## Purpose

AWX is committed to upholding the human rights of workers, and to treating them with dignity and respect as understood by the Australian and international community. This applies to all workers including temporary, migrant, young, contract, direct employees, and any other.

## Scope

This policy applies to all employees, including:

- full time, part time, casual, permanent or temporary;
- contract or commission workers;
- volunteers, vocational and work experience placements.

It applies to employees whilst:

- At the Company premises
- Attending work-related interactions with fellow employees, and with clients, candidates and other stakeholders;
- Fulfilling work-related obligations;
- At the Host Company/stakeholder premises; and/or
- At a Company sponsored or funded functions or activities during and/or outside working hours.

Other actions by employees outside working hours may also fall within the scope of this policy if there is an impact on the employee's ability and/or suitability to do his/her job or the actions bring the Company into disrepute.

## Policy

1. Forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used at any of AWX's work locations. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services.
2. There shall be no unreasonable restrictions on workers' freedom of movement at any AWX work locations in addition to unreasonable restrictions on entering or exiting company-provided facilities.
3. As part of the hiring process, migrant workers must be provided with a written employment agreement in language that they understand that contains a description of terms and conditions of employment prior to the worker accepting employment with AWX.
4. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment.
5. AWX, and Employers and clients of AWX, may not hold or otherwise destroy, conceal, confiscate or deny access by employees to employees' identity or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law.
6. Workers shall not be required to pay AWX or employers of AWX recruitment fees.
7. AWX, and Employers and clients of AWX, shall not use misleading or fraudulent practices during the recruitment of employees, nor provide or arrange housing that fails to meet the housing and safety standards. AWX, Employers and clients of AWX, must disclose the key terms and conditions of employment, including wages and fringe benefits, the location of work, living conditions and housing (if employer provided or arranged), and, if applicable, the hazardous nature of the work;
8. AWX requires its employees, suppliers, contractors and subcontractors, by contract clause, to agree to cooperate fully in providing reasonable access to allow government agencies, such as Fair Work Ombudsman, unions and other responsible enforcement agencies to conduct audits, investigations, or other actions to ascertain compliance with the *Fair Work Amendment (Protecting Vulnerable Workers) Act 2017* or

any other applicable law or regulation establishing restrictions on trafficking in persons, the procurement of commercial sex acts, or the use of forced labour.

## Trafficking in Persons

AWX joins the Australian Government and Fair Work Commission in its zero-tolerance policy regarding trafficking in persons.

1. AWX employees, suppliers, contractors and subcontractors at any location shall not—
  - a. Engage in severe forms of trafficking in persons during the period of performance of the contract;
  - b. Procure commercial sex acts during the period of performance of the contract; or
  - c. Use forced labour in the performance of the contract.
2. AWX reserves the right to take formal and legal action against any employees, suppliers, contractors or subcontractors for violations of this policy. Such actions may include, but are not limited to, termination of employment, reduction in benefits, suspension of payments, and/or termination of the contract for default or cause in accordance with the termination cause of the contract.
3. AWX is required to notify the Fair Work Ombudsman of any information it receives from any source that alleges a AWX employee, supplier, contractor or subcontractor has engaged in conduct that violates this policy, and of any actions it has taken against the alleged.
4. All AWX suppliers, contractors and subcontractors shall include the substance of this policy in all subcontracts in support of AWX business.
5. AWX may consider whether its supplier, contractor, or subcontractor had a Trafficking in Persons awareness program at the time of the violation as a mitigating factor when determining remedies.
6. Additional information about Trafficking in Persons and examples of awareness programs can be found at the Australian Government Fair Work Ombudsman website <https://www.fairwork.gov.au/about-us/news-and-media-releases/website-news/changes-to-help-protect-vulnerable-workers>

## Child Labour

The term “child” refers to any person under the age of 18, or under the age for completing compulsory education, or under the minimum age for employment in Australia, whichever is greatest.

AWX operates under strict guidelines and adheres to our Young Worker Protection Policy to protect the rights and safety of our young employees (see *POL0015 Young Worker Protection Policy*)

1. Child labour is not to be used in any stage of manufacturing, unless it is under the auspices of legitimate workplace learning programs, which comply with all laws and regulations.
2. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.
3. AWX employees, suppliers, contractors, and subcontractors shall ensure proper management of young workers through proper maintenance of young workers records, rigorous due diligence of educational partners, and protection of young workers’ rights in accordance with applicable law and regulations.
4. AWX employees, suppliers, contractors, and subcontractors shall provide appropriate support and training to all young workers.
5. In the absence of fair work legislation, the wage rate for young workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.
6. AWX prohibits the use of forced or indentured child labour by its employees, suppliers, contractors and subcontractors at any work location. AWX employees, suppliers, contractors and subcontractors at any location shall not utilize any work or service that is—

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- a. Exacted from any person under the age of 18 under the menace of any penalty for its nonperformance and for which the worker does not offer himself voluntarily; or
  - b. Performed by any person under the age of 18 pursuant to a contract the enforcement of which can be accomplished by process or penalties.
7. To enforce the policy prohibiting the utilization of forced or indentured child labour, AWX will conduct all due diligence to determine whether forced or indentured child labour is utilized at any location of its locations.
  8. AWX reserves the right to take formal and legal action against any employees, suppliers, contractors or subcontractors for violations of the prohibition on the use of forced or indentured child labour. Such actions may include, but are not limited to, termination of employment, reduction in benefits, suspension of payments, and/or termination of the contract for default or cause in accordance with the termination cause of the contract.

## Related Documents

- Young Worker Protection Policy
- EEO Policy
- Verification of Work Rights Policy

## Policy Review

This policy will be reviewed at least annually (or more frequently if necessary due to technical or other business policy requirements). The Company reserves the right to suspend, modify, or withdraw this Policy at any time. The Employee is responsible for regularly reviewing its terms.