

FORCED LABOUR and DEBT BONDAGE POSITION STATEMENT – MODERN SLAVERY

Overview

PLUS ES is committed to human and labour rights and the global eradication of modern slavery in all its forms. This Statement outlines our approach to addressing forced labour and debt bondage.

PLUS ES applies the *Commonwealth Modern Slavery Act* 2018 definition of modern slavery, which includes forced labour and debt bondage.

Forced labour occurs when individuals are compelled against their will to provide work or service through the use of force, fraud, or coercion.

Debt bondage is where labour services are provided as a means of repayment for a loan and any of: (1) the debt is manifestly excessive; (2) the reasonable value of the services is not applied toward repaying the debt; or (3) the length and nature of the services are not respectively limited and defined.

PLUS ES supports the UN Guiding Principles on Business and Human Rights and these guide our response to modern slavery.

Our concerns in our supply chain

Forced labour and debt bondage is an issue of concern to PLUS ES.

We take steps to mitigate and monitor the risk that forced labour or debt bondage is used by organisations with which PLUS ES directly partners. However, we are also concerned with organisations further down our supply chain where we have less control and influence.

Our concern for forced labour and debt bondage in our supply chain is exacerbated by the economic and labour shocks attributed to the COVID-19 pandemic, climate change, and armed conflict.

PLUS ES commits to developing its capability to identify and mitigate any risks of forced labour or debt bondage in our operations and services, as well as our supply chain, and remediate this practice to the extent that doing so is within our control and influence.

Our Actions

PLUS ES publishes an annual Modern Slavery Statement that sets out our values, risk areas, actions undertaken, and how we measure effectiveness in identifying and mitigating modern slavery risks (including forced labour and debt bondage) in connection with our business and supply chain.

Our workforce

PLUS ES supports actions to provide: healthy, safe workplaces; the rights of association; freedom to move employment; fair and equitable pay; and not to discriminate on gender, religion, or sexual orientation.

Our approach

To tackle modern slavery risks, our approach is to target actions across the following areas:

- Policies and procedures that put obligations on us and our suppliers such as our <u>Code of Conduct</u>, Sustainable Procurement Policy and <u>External Partner Code of</u> <u>Conduct.</u>
- Due diligence through regular risk-based assessment to identify our risk areas and inform our mitigation approach. We also actively engage with our suppliers, business partners, and industry peers, and investigate areas of concern.
- Continuous improvement and training to further develop our response.

PLUS ES supports five of the United Nations Sustainable Development Goals (**SDGs**) that best align with our business operations. One of these is UN SDG 8 – Decent Work and Economic Growth, which has a specific target for modern slavery, Target 8.7.

UN SDG Target 8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

Our commitments

We are committed to:

- Not directly partnering with or supporting new suppliers that use forced labour or debt bondage. In the event we discover that one of our existing suppliers uses forced labour or debt bondage, to actively engage in remediation including referrals of victims to support sytems, to the extent that doing so is within our control and influence.
- Taking measures to identify and mitigate the risk of forced labour and debt bondage in our business operations, and through dealings with third parties.
- Assigning appropriate governance to oversee this Statement and its implementation.
- Adhering to all relevant legislation and adopting suitable practices in accordance with relevant international labour and human rights standards to safeguard workers against forced labour and debt bondage.