

Human Rights Policy

PeopleIN Limited (ACN 615 173 076)

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1. Introduction

- 1.1 In this policy, a reference to 'we' or 'us' is a reference to PeopleIN Limited together with its controlled subsidiaries (collectively, **PeopleIN**).

Commitment

- 1.2 We are committed to respecting and upholding human rights, and to treating people with dignity and respect as understood and recognised by the Australian and international community. We recognise that respect for human rights is not only intrinsically important and fundamental to our values, it is also required for the long-term stability and growth of our business and to the wellbeing of the many people with whom PeopleIN interacts and the various communities in which it operates. As part of this commitment, PeopleIN has created this policy.
- 1.3 This policy is underpinned by PeopleIN's core values as expressed in its Code of Conduct.
- 1.4 The board of directors of PeopleIN (**Board**) has adopted this policy to:
- (a) clearly communicate PeopleIN's commitment to respect and uphold human rights across the entirety of its operations and supply chains; and
 - (b) assist those working and otherwise engaging with PeopleIN to understand and uphold this commitment.

Application

- 1.5 This policy applies to all persons engaged by us, including directors, officers, employees (whether permanent, fixed term, casual or temporary), contractors, service providers, consultants, secondees, trainees, volunteers, vocational and work experience placements, and agency staff, and other persons that act on behalf of or represent PeopleIN, wherever located (each, including directors, a **Staff Member**). This policy also applies to joint ventures where PeopleIN has operational control.
- 1.6 All Staff Members must understand and comply with this policy. All Staff Members are required to avoid any activity that might lead to a breach of this policy, whether by Staff Members or any other person to whom this policy applies.
- 1.7 As human rights risks and issues could arise within any of PeopleIN's business operations and divisions depending on its particular operations, the day-to-day responsibility for human rights risks and issues generally resides within each individual business unit. This includes implementing processes and controls to ensure compliance with the requirements of this policy relevant to their operations.
- 1.8 The executive team, management and senior staff will assist those reporting to them to be aware of and understand this policy as it applies to them and their particular business operations. Further, PeopleIN's Nomination and Remuneration Committee monitors the implementation of this policy, oversees its compliance, considers any improvements, and otherwise advises the Board in respect of such matters.
- 1.9 This policy also applies to:
- (a) all suppliers of goods or services to PeopleIN (including their employees and sub-contractors);

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- (b) any persons to whom PeopleIN provides goods, services or staff to; and
- (c) any business partners of PeopleIN,

and such persons must also understand and comply with this policy.

Effect of Policy

- 1.10 If a person to whom this policy applies does not comply with this policy, we may end our business relationship with such person, and to the extent that such person is a Staff Member, we may initiate disciplinary or dismissal actions, or otherwise terminate the relevant engagement.

2. Key concepts

Human Rights

- 2.1 The United Nations (**UN**) defines human rights as those rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. These rights:
- (a) include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more; and
 - (b) are set out in various local and international human rights laws and instruments, including (but not limited to) the UN's Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights.

Modern Slavery

- 2.2 Modern slavery consists of depriving a person of freedom for commercial gain and in violation of fundamental human rights. It describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery involves serious exploitation, not sub-standard working conditions or the underpayment of workers although this may be unlawful for other reasons.
- 2.3 Modern slavery can take many forms including:
- (a) human trafficking: the recruitment, harbouring and movement of a person through the use of coercion, threats or deception for certain exploitive end purposes through modern slavery;
 - (b) slavery: where a person exercises the rights of ownership over another person, and includes the trading in slaves or the financing of slave trading;
 - (c) servitude: where the victim is significantly deprived of their personal freedom and does not consider themselves free to cease providing their labour or services or to leave their place or area of work because of the use of coercion, threats or deception;
 - (d) forced labour: where the victim does not consider themselves free to cease providing their labour or services or to leave their place or area of work because of the use of coercion, threats or deception;
 - (e) debt bondage: where the victim pledges their services or the services of a third person as security for a real or purported debt where this debt is manifestly excessive, the reasonable

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value of their services is not applied to the debt, or the length and nature of their services are not limited or defined;

- (f) deceptive recruiting: where a recruiter charges a fee for the job offer, confiscates identity documents, deceives a person about personal freedom or their ability to leave the job;
- (g) forced marriage: where the victim gets married without freely and fully consenting because they have been coerced, threatened or deceived or because they are incapable of understanding the nature and effect of a marriage ceremony; and
- (h) child labour: this is not always unlawful but not tolerated by us when it involves exploiting children, depriving them of education or making them work in unsafe working environments.

2.4 Modern slavery can be complex and multi-faceted and can be difficult to spot. Some indicators for modern slavery may be where a person:

- (a) is not in possession of any personal identification;
- (b) appears to be instructed or controlled by someone else;
- (c) appears to be unable to contact friends or family freely, or otherwise move around freely;
- (d) is reluctant to speak to others, and allows others to speak for them, even when spoken to directly, and particularly when outside their immediate environment;
- (e) lives in poorly maintained and overcrowded accommodation;
- (f) has few personal possessions, including in respect of their work attire;
- (g) appears frightened, withdrawn, or shows signs of physical or psychological abuse;
- (h) appears to have little if any control over their finances, or are otherwise being financially exploited in some way; and
- (i) is usually dropped off and collected for work in the same way, particularly where such drop offs and collections are at unusual times.

2.5 The indicators outlined above are not exhaustive and do not necessarily mean there are modern slavery practices, or that modern slavery is not occurring. Sometimes there may be other reasons or circumstances that indicate that something is not right.

Discrimination

2.6 According to the Australian Human Rights Commission, discrimination occurs when a person, or a group of people, is treated less favourably than another person or group because of their background or certain personal characteristics. Discrimination can also occur where an unreasonable rule or policy applies to everyone but has the effect of disadvantaging some people because of a personal characteristic they share.

2.7 Discrimination can be unlawful if the differential treatment is based on certain immutable characteristics including age, gender, sexual preference, religious or political beliefs, disability and impairment or marital status.

3. Policy

3.1 PeopleIN will take all reasonable steps to:

- (a) respect and uphold internationally recognised human rights as guided by the UN Principles on Business and Human Rights and comply with all applicable local and international human rights laws;
- (b) not engage in, nor in any circumstances condone, violations of human rights and practices of modern slavery;
- (c) undertake appropriate checks, risk assessments and due diligence in respect of modern slavery and potentially adverse human rights impacts on those we engage with in our business, including our suppliers and host employers;
- (d) work closely with our stakeholders to identify and understand any impacts our business may have on human rights across our operations and supply chains and to mitigate the risks associated with any such impacts;
- (e) identify, address and limit the risks of modern slavery practices and adverse human rights impacts in our business and supply chains, particularly in respect of potentially vulnerable workers. In this respect, we have a zero-tolerance approach to modern slavery and we will seek to ensure that there is no modern slavery in our operations and supply chains and demonstrate continuous improvement in this regard through our annual reporting and our annual modern slavery statement, made in accordance with the *Modern Slavery Act 2018* (Cth) and any other applicable legislation;
- (f) use our influence wherever possible to demand high standards of human rights performance across our operations and supply chains and otherwise seek to prevent or mitigate potentially adverse human rights impacts associated with PeopleIN's third party relationships (including suppliers, host employers and business partners) that are directly linked to PeopleIN's business;
- (g) transition to only using approved contracts in respect of our operations which contain clauses specifically addressing modern slavery and adverse human rights impacts, including clauses which require those we contract with to:
 - (i) cooperate fully in providing reasonable access to allow government agencies, such as the Fair Work Ombudsman 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* (Cth) or any other applicable law or regulation establishing restrictions on modern slavery;
 - (ii) comply with Australian modern slavery laws and those foreign modern slavery laws that may apply to them; and
 - (iii) maintain appropriate records to demonstrate such compliance, including records which will enable PeopleIN to trace the supply chain of all goods and services provided to PeopleIN;
- (h) raise the awareness of PeopleIN's Staff Members and other persons to whom this policy applies of modern slavery risks and potential human rights issues, including by having this

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policy and by developing appropriate training for Staff Members, particularly those in managerial positions, in respect of the contents of this policy and the identification and reporting of any potential modern slavery practices and adverse human rights impacts within PeopleIN's operations and supply chains;

- (i) adopt a zero-tolerance approach in respect of unlawful discrimination, violence, sexual harassment, bullying, vilification and victimisation in the workplace, and be proactive in ensuring workplace diversity and inclusion at all levels of PeopleIN, in line with our Code of Conduct and Diversity Policy, and other subsidiary level policies (including policies in respect of equal opportunity, discrimination, bullying and harassment, young worker protection and vulnerable workers);
- (j) cooperate fully with any audits, investigations, or other actions undertaken by government agencies in respect of the potential occurrence of modern slavery or human rights violations;
- (k) actively recognise that the right to privacy is a fundamental human right in accordance with the International Covenant on Civil and Political Rights. Accordingly, we will adhere to our Privacy Policy, our Data and Cyber Security Policy, Code of Conduct and the *Privacy Act 1988* (Cth) whenever we collect, store and handle personal information;
- (l) ensure that effective grievance mechanisms to raise concerns and seek remedy (where appropriate) in respect of potentially adverse human rights impacts are in place and readily accessible, including those contained within our Whistleblower Policy and other subsidiary level policies;
- (m) reflect the spirit and content of this policy in other PeopleIN and subsidiary level policies and procedures; and
- (n) undertake regular reviews and ongoing assessment of PeopleIN's approach and responses to addressing potential human rights issues and risks in its business and supply chains, which may include updates to PeopleIN's existing policies or practices, the introduction of new or additional policies, practices and strategies or any other action considered necessary to eliminate or mitigate such risks as and when necessary.

3.2 In respect of the reasonable steps required to undertake the above, PeopleIN will take a risk-based approach having regard to its size and operations to decide when increased due diligence is required to understand, assess and address adverse human rights impacts associated with countries, industry sectors, business relationships, customers and transactions. However, given the nature of these extended relationships, it may not be possible to consider, mitigate or remediate all human rights concerns that could arise in all circumstances.

3.3 We expect that our Staff Members and all other persons to whom this policy applies also commit to take all reasonable steps to ensure our business and supply chains are free of modern slavery practices and adverse human rights impacts, including by:

- (a) not engaging in any way, or assisting with in any way, in the practice of modern slavery or human rights violations, whether in Australia or otherwise;
- (b) complying with Australian modern slavery laws and those foreign modern slavery laws (and other related laws) that may apply to them;

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- (c) ensuring that as part of any hiring process in relation to workers performing work in respect of PeopleIN's business:
 - (i) migrant workers are provided with a written employment agreement in a language they understand and which contains a clear description of the terms and conditions of employment prior to their engagement;
 - (ii) no misleading or fraudulent practices are undertaken to secure the engagement of the relevant worker; and
 - (iii) such workers are advised of the key terms and conditions of their 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;
 - (d) ensuring that all work performed in respect of PeopleIN's business is voluntary and that the workers performing such work are free to leave and terminate their employment;
 - (e) participating in all relevant training in respect of the contents of this policy and the identification and reporting of any potential modern slavery practices and adverse human rights impacts within PeopleIN's operations and supply chains;
 - (f) remaining alert to indicators of slavery (see above);
 - (g) obeying our instructions regarding modern slavery and potential adverse human right impacts;
 - (h) complying with any investigation being undertaken by a regulatory body in respect of modern slavery and potential human rights violations; and
 - (i) in respect of PeopleIN's suppliers, contractors and subcontractors, including the substance of this policy in all subcontracts in relation to PeopleIN's business.
- 3.4 Turning a blind eye to modern slavery is unacceptable and if any of our Staff Members or other persons to whom this policy applies reasonably suspects there may be modern slavery, we expect that they will report it under this policy.
- 3.5 We reiterate that we also expect our host employers, clients, suppliers and contractors to uphold the same values and comply with our expectations in regard to human rights commitments, as outlined under this policy.

4. Raising concerns

- 4.1 We are committed to ensuring that all Staff Members, and other persons to whom this policy applies, have a safe, reliable and confidential way of reporting any possible instances of human rights violations in respect of PeopleIN's operations or breaches of this policy.

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- 4.2 All Staff Members are encouraged to raise concerns about any issue or suspicion of possible instances of adverse human rights impacts in respect of PeopleIN's operations or breaches of this policy, including any concern regarding a breach of or conflict with this policy that may occur in the future, at the earliest possible stage with the relevant Staff Member's immediate supervisor/manager. For those other persons who are not Staff Members and to whom this policy applies, please contact the Group People Director with any concerns. If a person is unsure whether a particular act constitutes an adverse human rights impact or whether an act is otherwise inconsistent with, or in breach of, this policy, or for any other queries or concerns in respect of the issues raised in this policy, these should be raised with an immediate supervisor/manager (for Staff Members), or the Group People Director (for all persons who are not Staff Members).
- 4.3 To the extent a Staff Member or any other person is not comfortable, for any reason, with speaking directly to the nominated immediate supervisor/manager or the Group People Director, PeopleIN has a Whistleblower Policy which affords certain protections against reprisal, harassment or demotion for making the report. A copy of PeopleIN's Whistleblower Policy is available on PeopleIN's website.
- 4.4 Any such complaint must be handled under the relevant PeopleIN policies and procedures.
- 4.5 We may also be required to notify relevant government agencies if we become aware of any possible instances of any modern slavery or adverse human rights impacts in respect of PeopleIN's operations or breaches of this policy. If we decide that such notification is necessary, we will endeavour to discuss such notification with the person who brought forward their concern, if appropriate, and will otherwise comply with our Whistleblower Policy.
- 4.6 The Board will be informed of any material breaches of this policy.

5. Related Policies

For reference, PeopleIN also adopts the related policies, including its Code of Conduct, Diversity Policy, Privacy Policy and Whistleblower Policy. In addition, PeopleIN has other subsidiary level policies (including policies in respect of equal opportunity, discrimination, bullying and harassment, young worker protection, and vulnerable workers).

6. Approval, reviews and changes

- 6.1 This policy was last amended by the Board on 28 November 2024.
- 6.2 The Board will review this policy and related procedures as often as the Board considers necessary to ensure this policy remains effective and relevant to the current needs of PeopleIN.
- 6.3 The Board may amend this policy from time to time by resolution.