

## Modern Slavery and Ethical Sourcing Policy

### Review

This document was:

<b>Created by:</b>	Operations Team	<b>Review/Revise Date:</b>	January 2025
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Whizdom is a privately owned Australian company that provides recruitment and labour hire services to Australian businesses, specialising in Technology and Professional Staffing Services. We recognise that modern slavery is a complex issue, best tackled by a collective commitment and responsibility to prevent it from occurring in our business operations and supply chains.

We understand the need to observe the highest standard of corporate practice and business conduct in our interactions with employees, candidates, contractors, clients, and all other applicable stakeholders, and the environment in which we operate. In turn, we expect our suppliers and business partners to demonstrate similar ethical standards.

### Statement

We are committed to providing a respectful environment for all workers, free from discrimination, abuse, and exploitation. Whizdom upholds the principles of human rights and commits to ensuring our recruitment procedures do not contribute to any form of human rights abuses. This includes the prohibition of forced labour, child labour, discrimination, and any other practices that violate basic human rights.

### Purpose

This policy reflects our commitment to ethical sourcing and our zero-tolerance stance on modern slavery in our business operations and supply chain.

Whizdom are committed to:

- remain compliant under the *Modern Slavery Act 2018 (cth)* and other applicable laws and regulations in areas in which the business operates.
- sourcing products and services in accordance with legal obligations and community expectations while working with suppliers to improve their social practice.
- act to prevent, mitigate and where appropriate, remedy modern slavery in our operations and supply chains.

Whizdom observes the minimum standards set out in this policy, these minimum standards apply to all stages of our supply chain. Whizdom will only engage with suppliers who share our commitment to ethical sourcing and modern slavery prevention. We expect suppliers to comply with the minimum standards as well as local, national, and other applicable laws and regulations in the countries in which they operate.

If a supplier is unable to demonstrate a commitment to comply with this policy, Whizdom may cease the relationship with the supplier.

### Definitions

**Modern slavery:** Defined as including eight types of serious exploitation: trafficking in persons,

slavery, servitude, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

**Child Labour:** Defined as any work by a child or young person, which does not comply with the provisions of the relevant [International Labour Organisations \(ILO\)](#) standards, and any work that is likely to interfere with that person's education, or to be harmful to that person's health or mental, spiritual, moral, or social development.

**Child (or children):** Is defined as a person under the age 15, or below the age at which school attendance is not compulsory under local law, whichever is older.

**Young Person:** Is defined as a person under the age of 18 but not classified as a child.

**Forced Labour:** Any work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person.

**Bonded Labour:** Work, which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange.

**Indentured labour:** in which an employer forbids workers from leaving employment at the workers discretion.

### Minimum Standards

We are committed to the following minimum standards to prevent incidents of modern slavery within our business operations and supply chain:

1. **No forced, bonded, or indentured labour:** Employment shall be freely chosen, and not be restricted by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment.
2. **No Child Labour:** Child labour shall not be used, compliance with minimum legal working age, and an appropriate process for verifying the age of all employees and job applicants must be in place.
3. **Wages:** compliance with all laws regulating local wages, overtime compensation and legally mandated benefits.
4. **Working hours:** compliance with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws, or in the absence of such law by the applicable [ILO](#) standard.
5. **No Discrimination:** All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics such as age, impairment, mental, intellectual, psychiatric, and physical disability, marital status, nationality, political opinion, race, colour, social origin, religion, sex, sexual orientation, or any other characteristic protected by applicable laws. Employees must be provided an environment where they can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.
6. **Working conditions:** Provide a safe and hygienic working environment that is without risk to health.
7. **No bribery:** Bribes, favours, benefits or other similar lawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise.

8. **Environmental compliance:** Comply with relevant local and national environmental protection laws and will as far as practicable, comply with international environmental protection standards.
9. **Grievance mechanisms and recourse:** Policy and process in place for workers to approach management on issues of concern, on their own or through worker representatives, confidentially. Protect whistle-blower confidentiality and prohibiting retaliation against workers who report workplace grievances.

### Grievance and Reporting

Employees who witness suspected or actual modern slavery or human rights issues, must report the incident directly to an executive team member. All incidents are recorded and investigated in a confidential and impartial manner by the executive team, via the internal [Issues and Complaints procedures](#). Whizdom prohibits retaliation against any employee who makes a good faith report or participates in an investigation.

An individual who suspects Whizdom has breached this policy must immediately notify us by completing the online [Complaints and Issues](#) form.

If suppliers are found to be in breach of this policy, Whizdom will take appropriate action which may include terminating the business relationship, working with the Police and other regulatory and law enforcement bodies.

### Review and Continuous Improvement

This Modern Slavery and Ethical Sourcing policy will be reviewed in line with our annual document review process and is updated as necessary to reflect changes in operations, regulations, and best practices.

The Whizdom Executive team are committed to continuous improvement in the efforts to combat modern slavery and uphold ethical sourcing standards.

As well as the annual document review, Whizdom also relies on the following policies to assist in managing the risks of modern slavery:

- Whistle-Blower Policy
- EEO Policy
- Corporate and Social Responsibility Policy
- Quality Policy
- Digital Communication Policy

*\*Reference: [International Labour Organization](#) and [Anti-Slavery International](#): Apr 2024*