

Modern Slavery Policy

August 2026

Revision	Changes since last published revision
1.0	New document.

Purpose

This Modern Slavery Policy outlines ASC's commitment to identify, mitigate and manage risks relating to modern slavery, human trafficking, forced labour and exploitation within its operations and supply chains. ASC is committed to respecting human rights, acting ethically and ensuring transparency and accountability in all aspects of its business and has a zero-tolerance policy towards modern slavery in all forms. ASC will not knowingly engage in, or support, any activities that involve modern slavery.

Scope

This policy applies to all:

- ASC employees, contractors, consultants and temporary staff;
- suppliers, service providers and partners that contribute to ASC's operations; and
- ASC operational locations and supply chains, both domestic and international.

Policy statement

ASC is committed to:

- conducting due diligence on its operations and supply chain to identify and address modern slavery;
- ensuring its business practices uphold the highest ethical standards;
- engaging only with suppliers who share ASC's commitment to fair labour practices;
- continually improving its modern slavery processes and practices by regularly reviewing their effectiveness; and
- complying with the *Australian Modern Slavery Act 2018 (Cth)* and other relevant legislation in the jurisdictions where ASC does business.

Policy objectives

- **Prevent modern slavery:** Seek to ensure that modern slavery, forced labour, human trafficking and other forms of exploitation have no place within ASC's operations or supply chains.
- **Promote ethical conduct:** Uphold high standards of integrity, ethical behaviour and human rights in all business practices and relationships.
- **Ensure compliance:** Comply with all applicable modern slavery legislation and regulatory requirements, including reporting and due diligence obligations.
- **Strengthen supplier accountability:** Require suppliers, contractors and business partners to adhere to ASC's standards and proactively manage modern slavery risks in their own operations and supply chains.
- **Identify and manage risk:** Identify, assess and mitigate modern slavery risks across ASC's business activities, procurement processes and supply chains.
- **Enhance transparency:** Maintain transparency in ASC's operations and supply chains, including clear reporting on actions taken to address modern slavery risks.
- **Support reporting and whistleblowing:** Encourage ASC employees, suppliers and stakeholders to report concerns without fear of retaliation, and ensure appropriate channels are in place.
- **Educate and raise awareness:** Provide training and resources to ASC employees and relevant stakeholders to recognise and respond to modern slavery risks.
- **Drive continuous improvement:** Monitor, review and improve ASC's practices, controls and policies to continually strengthen the company's response to modern slavery.

Definitions

Acronym/Term	Definition
ASC	ASC Pty Ltd and its subsidiary companies.
Modern Slavery	Includes, but is not limited to, forced labour, involuntary servitude, debt bondage, human trafficking, descent-based slavery, child labour, deceptive recruiting for labour or services, and forced and early marriage.
Whistleblower	Any director, manager, employee or contractor of ASC (current or former) who, whether anonymously or not, makes a disclosure or report in relation to disclosable conduct. This also includes a relative or dependant of any of the above, but only for the purposes of whistleblower protections under the <i>Corporations Act 2001</i> (Cth) and the <i>Taxation Administration Act 1953</i> (Cth).

Governance and responsibilities

ASC Board

- Hold ultimate accountability for ASC's modern slavery risk management.
- Review and approve the annual ASC Modern Slavery Statement.

Modern Slavery Working Group

- Oversee ASC's modern slavery risk management by identifying risks, strengthening controls, and guiding supplier due diligence.
- Monitor performance, support training and awareness, and drive continuous improvement across the organisation.

Supply chain governance / procurement

- Conduct due diligence on suppliers and third parties.
- Assess, manage and monitor modern slavery risks in procurement processes.
- Ensure supplier contracts contain appropriate modern slavery clauses.

Managers and employees

- Comply with this policy and all related processes.
- Report concerns or suspected instances of modern slavery.

Risk identification and management

ASC identifies and assesses modern slavery risks through:

- mapping its supply chains;
- evaluating suppliers based on geography, industry and labour practices;
- conducting due diligence on potential, new and existing suppliers; and
- reviewing high-risk categories, such as manufacturing, logistics, cleaning and offshore labour services.

Supplier expectations

ASC expects all suppliers to:

- uphold fair labour standards and comply with all applicable laws;
- implement due diligence procedures to ensure that there is no modern slavery in their supply chains;
- comply with ASC's Supplier Code of Conduct;
- provide safe and fair working conditions;
- be transparent about their labour practices; and
- support audits, assessments or investigations where required.

Non-compliance may result in remediation requirements and/or suspension of the supplier relationship, or termination of the supplier relationship.

Training and awareness

ASC provides training to:

- employees involved in procurement and supply chain management; and
- leaders and teams in operational areas.

Training covers recognising red flags, reporting pathways, and understanding ASC's responsibilities under the *Modern Slavery Act 2018 (Cth)*.

Reporting concerns

ASC employees and stakeholders can confidentially report concerns or suspected incidences of modern slavery through:

- Internal reporting channels.
- ASC's Whistleblower hotline: **+61 1800 685 449**
- Email: ASCspeakup@coreintegrity.com.au
- Online: <https://speakup.coreintegrity.com.au/asc>

ASC will treat all reports seriously, investigate them promptly and handle them sensitively.

Remediation

If modern slavery risks or incidents are identified, ASC will work collaboratively with the supplier or affected parties to address the issue, prioritising impacted individuals' wellbeing and rights.

ASC may also take further corrective action, which may include suspending or, if issues can't be resolved, terminating the supplier relationship.

Monitoring and review

ASC will:

- regularly review its policies, supplier arrangements and risk assessments;
- measure the effectiveness of its actions and improve its practices; and
- publish an annual Modern Slavery Statement.

Policy review

This policy will be reviewed annually or as required to ensure ongoing compliance and relevance.





ASC Pty Ltd

ACN 008 605 034

Registered and Head Office

694 Mersey Road North, Osborne

South Australia 5017

P +61 8 8348 7000

F +61 8 8348 7001

W asc.com.au

Find ASC on:

