



# Modern Slavery Policy

## Purpose and scope

Nick Scali Limited (the **Company**) has zero tolerance for modern slavery, and is committed to minimising the risk of modern slavery occurring within its own business or infiltrating its supply chains or other business relationships. As part of this commitment, the Company has in place this Modern Slavery Policy.

The Company expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with its objectives. The Company will only do business with organisations who fully comply with this policy, or who are taking verifiable steps towards compliance.

This policy will be used to underpin and inform any statement on modern slavery and human trafficking that the Company is required to produce further to the transparency in supply chain requirements of the Modern Slavery Act 2018 (the **Act**).

## Who does this policy apply to?

The policy applies to any individual who is, or has been, any of the following

- a) an officer of the Company;
- b) an employee of the Company;
- c) a supplier, contractor or subcontractor that supplies services or goods to the Company (whether paid or unpaid);
- d) an employee of a supplier, contractor or subcontractor that supplies services or goods to the Company (whether paid or unpaid);

## What is meant by Modern Slavery?

Modern slavery is a complex and multi-faceted problem, and can take many forms; it. Under the Act it means conduct that would constitute:

- a) an offence under Division 270 or 271 of the Criminal Code (Appendix 2); or
- b) an offence under either of those Divisions if the conduct took place in Australia; or
- c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (Appendix 3); or
- d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) (Appendix 4)

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The Act further defines Modern Slavery as including eight types of serious exploitation:

- i. trafficking in persons
- ii. slavery
- iii. servitude
- iv. forced marriage
- v. forced labour
- vi. debt bondage
- vii. deceptive recruiting for labour or services; and
- viii. child labour

All forms of modern slavery have in common, the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

### **Company Approach to Modern Slavery**

The Company has zero tolerance for modern slavery, and will not engage with any suppliers or other third parties where either there is evidence that modern slavery exists or where insufficient measures are in place to detect and minimise the risk of modern slavery.

### **Compliance with this policy**

The prevention, detection and reporting of modern slavery is the responsibility of all Nick Scali Limited employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

Instances, or suspected instances, of modern slavery (including instances where insufficient measures are in place to detect and minimise the risk of modern slavery) are considered disclosable matters under the Company's Whistleblower Policy, and consequently any employee, director or officer of the Company that suspects that an act of modern slavery has occurred or may occur must immediately report the matter in accordance with the Company's Whistleblower Policy.

### **Breaches of this policy**

The breach of this policy by an employee, director or officer of the Company may lead to disciplinary action in accordance with the Company's disciplinary procedures. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

Where there is evidence that modern slavery exists within a supplier or third party, or that insufficient measures are in place to detect and minimise the risk of modern slavery within a supplier or third party, the Company will immediately cease any business relationship with the supplier or third party, pending further investigation.

### **Monitoring of this policy**

The Chief Financial Officer will be responsible for preparing periodic reports on the effectiveness of this policy and monitoring the number and types of suspected instances of modern slavery within

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the business and its supply chains. These reports will be provided to the Nick Scali Audit Committee to ensure they are kept informed about the effectiveness of the entity's policy, processes and procedures. When required, specific matters will be escalated to the Audit Committee to determine whether any specific matters, improvements or changes need to be considered by the Board.

### **Management of this policy**

The Board has overall responsibility for monitoring this policy. The Managing Director has the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place to ensure that the Company complies with all its legal and ethical obligations.

This policy will be reviewed and amended from time to time.

### **Availability of this policy**

Employees, officers and directors of the Company will be able to access this policy on the Company's intranet, and this policy will be made available on the Company's website so that it can be accessed by other individuals to whom it may apply.

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