

# Modern slavery **policy**

How we limit the risk of modern slavery across our business and supply chain, and comply with the Modern Slavery Act.



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# 1. INTRODUCTION

## 1.1 Definitions

Employees	All staff, contractors, consultants and temporary workers of the Pacific Energy group of companies (Group).
Manager	An individual employee's direct supervisor/manager
CEO	Chief Executive Officer
Supplier	A person who supplies goods and services to the Group (whether paid or unpaid) and any employees of the Supplier.

## 1.2 General Statement of Policy

Modern slavery is a term which covers a range of exploitative practices including human trafficking, sexual exploitation, forced labour, forced criminality, domestic servitude, child exploitation and forced organ removal.

The Group is committed to limiting the risk of modern slavery within its own business, within its supply chains and through any other business relationship.

## 1.3 Purpose

The purpose of this Policy is to:

- limit the risk of modern slavery occurring within the Group, its supply chain or in any other business relationship;
- demonstrate the Group's commitment to only doing business with those who fully comply with the Modern Slavery Act; and
- ensure compliance with the Modern Slavery Act.

## 1.4 Scope

This policy applies to all staff, contractors, consultants and temporary workers of the Group.

# 2. POLICY

## 2.1 Policy Statements

- All employment with the Group is voluntary.
- The Group does not use or condone, child or forced labour in any of its operations or premises and works to ensure these practices are not present in its workforce or supply chain.
- The Group prohibits the employment of employees within the Company, and within Suppliers to Pacific Energy, who are under the international minimum age of 15 years.
- The Group prohibits any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, forced labour or involuntary servitude.

- The Group abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- Where the Group is made aware of modern slavery practices in its own business or within its supply chain, the Group will investigate all claims and if valid, resolve the issue in line with the values expressed in this Policy.
- The Group conducts risk assessments to determine which parts of the business and supply chains are most at risk from modern slavery to ensure focus on those areas.
- This Policy will be used to underpin and inform any statement on modern slavery that the Group is required to produce as a result of legislative requirements in any country in which the Group operates.
- Pacific Energy is committed to respecting human rights in accordance with the Universal Declaration of Human Rights.

## **2.2 The Group's Supply Chain**

- The Group expects its Suppliers and Customers to have similar values to the Company in relation to modern slavery.
- The Group engages with Suppliers and Customers to promote and support anti-slavery practices throughout the Group's supply chain.
- The Group is committed to introducing anti-slavery obligations in all Supplier contracts. As part of their contractual obligations, Suppliers will agree to undertake a process so the Group can gauge the Supplier's ongoing commitment to eradicating modern slavery within its own business and those of its own suppliers.

## **3. BREACH OF THIS POLICY**

### **3.1 Breach of this Policy**

Any breach of this Policy will be taken seriously and dealt with on a case by case basis.

A breach of this Policy by an Employee may lead to disciplinary action being taken in accordance with the Group's disciplinary process. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to the Group's disciplinary procedure.

A breach of this Policy by a Supplier will also be dealt with on a case by case basis. Depending on the behaviour, the Group may choose to adopt a zero-tolerance stance towards the Supplier's behaviour and look at methods of preventing further engagement with the Supplier, or may decide to work with the Supplier so they become compliant with this Policy.

### **3.2 Policy Review**

The Chief People, Culture and Sustainability Officer will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chief People, Culture and Sustainability Officer.

This policy will be reviewed annually by 20 December.

### **3.3 Dissemination of Policy**

A copy of this policy will be provided to each employee upon commencement of employment and additional copies will be made available upon request.

### **3.4 Related Documents**

#### **3.4.1 Legislation**

- (i) Modern Slavery Act 2018

A handwritten signature in blue ink, appearing to read 'Jamie Cullen', with a small horizontal line extending to the right.

Jamie Cullen  
**Group CEO**  
01/05/2024

#### 4. ELECTRONIC APPROVAL RECORD

DATE OF AUTHOR	AUTHOR ROLE	NAME
01/05/2024	Senior ESG Advisor	Shaila Noronha
DATE OF REVIEW	REVIEWER ROLE	NAME
01/05/2024	Chief People, Culture & Sustainability Officer	Kaye Butler
DATE OF APPROVAL	APPROVER ROLE	NAME
01/05/2024	Chief Executive Officer & Managing Director	Jamie Cullen

#### 5. DOCUMENT AMENDMENT RECORD

DATE OF CHANGE	REVISION	CHANGE EFFECTED
07/10/2020	1.0	New document.
22/06/2022	2.0	Document numbered and formatting
24/01/2024	3.0	Updated cover page.
07/02/2024	4.0	Updates to section 2.1 and 3.2
01/05/2024	5.0	Update 2.1