

# MODERN SLAVERY POLICY

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## 1. Introduction

YDR is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

The policy applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

YDR expects all who have, or seek to have, a business relationship with the Company to act in a way that is consistent with its values. The Company will only do business with organisations who uphold these values.

This policy will be used to underpin and inform any statement on 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* (MSA).

## 2. What Do We Mean by Modern Slavery?

Modern slavery can take many forms; it is a complex and multi-faceted problem. The Australian Government defines modern slavery as encompassing eight types of serious exploitation:

- Trafficking in persons
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage
- Deceptive recruiting for labour or services
- The worst forms of 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.

Tackling modern slavery requires all staff to play a part and remain vigilant to the risk in all aspects of the YDR business and its business relationships.

## 3. Our Policy

- a. Modern slavery breaches the most fundamental freedoms and human rights of individuals. YDR rejects all forms of modern slavery and recognises that modern slavery is never acceptable in any of its forms.

- b. We are committed to respecting human rights and taking meaningful action to identify and address risks within our direct control which have the potential to cause, contribute to, or directly link YDR to modern slavery.
- c. YDR is committed to taking meaningful action to prevent, mitigate and, where appropriate, remedy modern slavery risks in its operations and supply chains.

#### 4. Responsibility for This Policy

YDR's Directors have overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The National Operations Manager 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, and amended as appropriate, to ensure it can operate effectively.

#### 5. Communication and Employee Awareness Training

YDR Management will ensure that relevant colleagues receive adequate training on this policy and any supporting processes applicable to their role.

#### 6. Breaches of This Policy

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

All colleagues will be expected to fully co-operate possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from one of the Partners or the National Operations Manager.

#### 7. Status of This Policy

This Anti-Slavery Policy will be reviewed by the Directors on a regular basis.

This notice reflects the Company's current practice. YDR will update the notice from time to time to reflect legal and operational requirements.