

Modern Slavery Policy

Wade Group will use all reasonable endeavours to prevent a breach of **Modern Slavery** within its business activities, including performing appropriate due diligence for the identification of **Modern Slavery** in all its business activities.

Wade Group anticipates that all individuals who have, or wish to establish, a business relationship with the company will acquaint themselves with this policy and conduct themselves in alignment with its core values.

You warrant to Wade Group that:

(a) neither You, nor any of Your Personnel, have:

(i) been involved in, admitted to, or been convicted of, any conduct constituting or relating to **Modern Slavery**.

(ii) been involved in, or are subject to, current, pending or threatened investigation of any offence or allegation relating to **Modern Slavery**, including by any law enforcement, regulator or other governmental agency, or any customer or supplier.

(b) You will use all reasonable endeavours to prevent a breach of **Modern Slavery** within your business activities, including performing appropriate due diligence for the identification of Modern Slavery in all of Your activities and are not aware of any circumstances that could give rise to Modern Slavery.

(c) You have in place appropriate policies to manage risks of breaching **Modern Slavery** and have conducted appropriate training in accordance with generally accepted standards of business conduct;

(d) You have in place adequate procedures and mechanisms for reporting any instance or suspected instance of **Modern Slavery**, including in Your supply chain, and ensuring that all such reports are fully investigated and acted upon appropriately.

Compliance

Responsibility and Reporting:

- The prevention, detection, and reporting of modern slavery within any part of our business or supply chains are the responsibility of all individuals working for us or under our control. Any activity that might indicate a breach of this policy must be promptly reported and avoided.

Engagement with Suppliers:

- When appropriate, the Company will directly engage with suppliers to understand the measures they have in place to prevent modern slavery within their own businesses.

Employee Obligations:

- Employees must notify their manager (or the main point of contact at Wade Group) immediately if they believe or suspect a breach of this policy has occurred or may occur in the future.

Encouraging Concerns:

- All parties are encouraged to raise concerns about modern slavery in any part of our business, supply chains, or supplier tiers at the earliest possible stage.

Clarification and Support:

- If unsure whether an action, treatment of workers, or working conditions constitute modern slavery, employees should discuss it with their manager (or the main point of contact at Wade Group).
- Wade Group promotes openness and supports anyone who raises genuine concerns in good faith, even if they later prove to be mistaken.

Protection Against Detrimental Treatment:

- No one should face detrimental treatment (such as dismissal, disciplinary action, or threats) for reporting suspicions of modern slavery. If such treatment occurs, individuals should inform the General Manager immediately.
- If the issue remains unresolved, employees can follow the Company's grievance procedure.

Breaches Of This Policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals and organisations working for us or on our behalf (including suppliers) if they breach this policy.

Modern Slavery Act 2018: <https://www.legislation.gov.au/Details/C2018A00153>

Definitions

- **“Personnel”** of a party means that party’s employees, officers, directors, contractors, subcontractors, or agents or any of them.
- **“Slavery”** where ownership is exercised over an individual.
- **“Modern Slavery”** includes, but is not limited to, conduct which is defined as ‘modern slavery’ under section 4 of the Australian Modern Slavery Act 2018 (Cth).
- **“Wade Group”** means Wade Group 2011 Limited and includes its subsidiaries, successors, and assigns.
- **“You”** means the person or organisation that is supplying the goods or services to Wade Group 2011 Limited.

Review Protocol:	
Policy Owner:	Wade Group Management Team
Approved By:	Managing Director
Policy Reviewed By:	Management Team
Date Reviewed:	10 May 2024
Next Review Date:	10 May 2025

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Dated: 10 May 2024

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