

Purpose

The purpose of this document is to set out the steps JMH Group takes to identify, manage, and mitigate the risks of modern slavery in our operations and supply chains and how we evaluate the effectiveness of our responses.

JMH Group commitment to preventing modern slavery is an organisational priority.

JMH Group is not a reporting entity under the *Modern Slavery Act 2018 (Cth)* (the "Act"), however JMH Group is fully supportive of the principles within the act and commits to upholding these principles and ensuring our clients and stakeholders are likewise committed.

This Procedure also aligns with other JMH Group policies and procedures including our Code of Conduct, Equal Opportunity and Affirmative Action Procedure, Workforce Complaint Resolution Procedure, Misconduct and Discipline Procedure, Work Health and Safety Policy, Family and Domestic Violence Procedure, HR and Leadership Team Best Practice Guidelines, and Workplace Bullying Procedure.

This Procedure forms a key component of the culture at JMH Group is documented and managed in the Company Integrated Management System (IMS) and supports the long-term sustainable success of our business.

Definitions

Modern slavery is defined as including eight types of serious exploitation:

- trafficking in persons
- slavery
- servitude
- forced marriage
- forced labour
- debt bondage
- the worst forms of child labour, and
- deceptive recruiting for labour or services

Why combatting Modern Slavery is important

The United Nations (UN) and Walk Free Foundation estimate there are approximately 40 million victims of modern slavery around the world. 16 million of these victims are exploited in the private economy.

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery involves grave abuses of human rights and serious crimes.

Modern slavery has severe consequences for victims. It involves grave abuses of human rights and serious crimes. Often, modern slavery disproportionately impacts women and girls.

It is estimated that as of 2023 in Australia, there are approximately in excess of 1,900 people living under some form of modern slavery.

What are some of the signs of Modern Slavery?

Often instances of modern slavery go unnoticed or are not recognised for what they are; some of the common hallmarks of modern slavery may include:

- Workers with controlled or restricted freedom of movement – workers may be monitored, guarded or confined in an unusual way
- Workers subject to intimidation and threats including threats of deportation
- Threatened or actual physical and/or sexual violence
- Travel or other important documents have been taken by employer or a third party
- Abusive or substandard living and/or working conditions are provided
- Having no option but to live at the workplace or another place owned/controlled by employer
- Isolation – geographic, social and/or linguistic
- Withholding, underpayment or no payment of wages
- Excessive hours of work when examined against accepted industry norms
- Debt bondage (i.e. labour or services are provided as security or repayment of an inflated debt)
- Deceived during recruitment, or engaged in a process lacking in information about nature and conditions of work
- No discretion over life decisions
- Unable to end employment at will

How we prevent Modern Slavery at JMH Group

We all play a role in identifying potential instances of modern slavery and taking personal accountability for eliminating modern slavery from our supply chains.

All JMH Group employees, contractors and partners are responsible for:

- Acting with integrity and respect and otherwise in accordance with our company values
- Role modelling the behaviors through everyday actions
- Adherence to our Policies and Procedures and Company Code of Conduct
- Ensuring best practice recruitment processes are maintained
- Providing candidates and workers with comprehensive, compliant employment documents and agreements that clearly define roles, remuneration, duties, rights and responsibilities

In addition to the above, the JMH Group Leadership Team will:

- Establish and sponsor this MODERN SLAVERY PROCEDURE
- Lead by example
- Use a Risk Management approach to address potential modern slavery instances
- Provide a third-party confidential Employee Assistance Program to JMH Employees and families
- Maintain active membership of peak industry representative bodies such as the WA Chamber of Commerce and Industry
- Ensure JMH workers and management are properly trained and aware of modern slavery risks and best practice management principles
- Ensure suppliers and stakeholders are compliant with legislative requirements, and supportive of the eradication of modern slavery from our operations and supply chains
- Actively drive improvement and monitor progress against our modern slavery plan

JMH Group is an equal opportunity employer and does not discriminate on grounds of age, gender, race, national or ethnic origin, language, religion, political beliefs, sexual orientation, or physical disability.

We work hard to develop systems and processes that are free from bias, enable flexibility and are designed to attract, retain, and reward diverse talent and inclusive leaders. We are committed to developing and supporting productive, mutually beneficial, and long-term relationships with local communities, suppliers, and partners.

Our commitment to inclusion and diversity

Inclusion is everybody's business.

At JMH Group we aspire for our people to stand by the values of our business, with inclusion and respect at our core. By doing this, we can seek to:

- Embrace and invite different perspectives, valuing diversity as a strength
- Ensure our processes are transparent, fair, and free from bias wherever possible
- Ensure that our people can achieve their full potential and have equal opportunity to participate, learn and grow
- Hire, promote and engage a diverse workforce that is treated and remunerated fairly
- Provide an environment where people feel safe to speak up when things are not right, or others are excluded or taken advantage of
- Develop strong and sustainable relationships with diverse stakeholders including shareholders, communities, employees, governments, customers, and suppliers.

JMH Group seeks to ensure every voice is heard, every idea is encouraged, and everybody is supported to perform at their best.

Procedure Compliance

Workers who breach this Procedure may be subject to disciplinary action and may be required to enter into a Performance Improvement Plan with JMH Group before being permitted to resume work.

Nothing in this Procedure prevents JMH Group from applying Summary Dismissal in circumstances involving Serious Misconduct.