

## APP:531 MODERN SLAVERY POLICY

*idec* is committed to eliminating modern slavery, including forced labour, human trafficking, and exploitation from our workplace and supply chains.

*idec* recognise that modern slavery is a serious violation of human rights and a crime under international law, and we will not tolerate it in any form.

This policy is a public expression of this commitment, and outlines the means of identifying the risks, mitigation strategies, and the measures for assessing the effectiveness of those strategies. These have been adopted in accordance with the *Modern Slavery Act 2018*.

### **Reporting Entity, Structure and Operations**

*idec* Solutions Pty Ltd is the Reporting Entity. *idec*'s registered office and principal place of business is 265 Queensport Rd North, Murarrie, QLD 4172.

*idec* is a licenced builder specialising in the design and construction of commercial and industrial buildings and remote infrastructure. Our in-house capabilities expand upon this to include workshop detailing, fabrication, steel processing and site erection.

### **Supply Chain**

*idec* have enduring relationships with valued suppliers and subcontractors. The selection process is in accord with relevant OH&S and Quality Assurance standards, and demonstrable business integrity principles. We prioritise supporting local businesses that have the necessary skills and experience and that provide cost-effective services.

Our supplier due diligence strategy includes our resolve to:

1. Engage with formal labour providers with an identifiable and distinct legitimate business entity.
2. Perform risk assessment of suppliers and subcontractors in relation to any connection to modern slavery or other unethical hiring and recruitment practices such as:
  - a. Sourcing labour or materials from countries with known human rights violations or a high proportion of migrant workers.
  - b. Materials are sourced from industries that have previously been affected by undeclared, illegal or trafficked labour.
  - c. Links in supply chain where migrant workers do not work under collective agreements.
  - d. Links in supply chain where there is unskilled, temporary and/or seasonal labour.
3. Identify any high-risk suppliers or subcontractors that may require a more detailed risk-assessment or workplace audit before engaging in further business.
4. Implement measures to counter modern slavery including:
  - a. Creating a culture that encourages supervisors and managers to talk informally to workers about issues or grievances they are experiencing such as harassment, bullying, control, coercion, or exploitation.
  - b. Looking for warning signs within supply chain participants that include:
    - Charging recruitment fees for workers.

- Tying workers' accommodation to their employment status.
- Sham contracting (misrepresenting employees as independent contractors).
- Enforcing unrealistic and unmanageably brief lead times or work schedules.
- Suspicious purchasing practices including methods that reduce traceability; unusual labour and materials invoicing; deposit requests for goods that do not usually require deposits.
- Unlawful wage deductions or underpayments.
- Employees personal bank account details shared by multiple people.
- High shared occupancy at workers' addresses.
- Signs of injury or malnourishment.

### **Risk**

*idec* has identified potential risks of modern slavery practices in its supply chain, as follows.

Raw Steel Fabrication and Processing:

- Countries involved are known to have links to forced labour.
- It is difficult to discern the origin of some raw materials.
- Steel production processes can pose significant risks to the health and safety of workers.
- Few employment protections may be offered for performing hazardous work.

Indirect supplies (such as consumables, uniforms):

- Raw materials harvested and processed in countries that have known incidents of modern slavery in their textile industries.
- The clothing supply chain has a high risk of slavery because of poor working conditions, excessive hours worked and minimal pay.

Machinery and other hardware:

- Labour exploitation has been linked to migrant workers in the electronics manufacturing industry.
- Forced labour is a known incident in mines where critical components are extracted.
- Complex supply chains elevate the risks. Contractors:
- Sham contracting.

### **Actions**

*idec* has communicated to the team via induction training. It is also broadcast on our website for all stakeholders to access anytime.

We undertake meaningful risk assessments via Supplier Procurement Questionnaire for our suppliers and subcontractors.

### **Assessment and Commitment**

*idec* are committed to:

- Complying with applicable laws and regulations related to modern slavery.
- Ensuring that our employees and suppliers are treated with respect and dignity and are not subjected to any form of forced labour, coercion, or exploitation.
- Investigating and addressing any reports or suspicions of modern slavery promptly and thoroughly.
- Providing appropriate support and remedies to victims of modern slavery, where possible.

### **Responsibility**

*idec*'s management team is responsible for implementing this policy. Employees are expected to act in accordance with this policy and report any concerns or suspicions of modern slavery to their manager.

### **Reporting and Monitoring**

*idec* will monitor and report on this policy by:

- Reporting any suspected incidents of modern slavery to the relevant authorities.
- Reviewing and updating this policy regularly to ensure it remains effective.
- Reviewing and monitoring our supply chains to assess their compliance with this policy.
- Conducting internal reviews to assess the effectiveness of our policies and practices related to modern slavery.

### **Conclusion**

*idec* are committed to eliminating modern slavery from our workplace and supply chains. *idec* will take all necessary measures to achieve this goal. *idec* recognise that this is an ongoing process and will continue to review and improve our policies and practices to prevent modern slavery.

Signed: \_\_\_\_\_

Chief Executive Officer

Dated: \_\_\_\_\_

*This Policy is to be revised every two years (last revised 18/01/24)*