



MILC Group Modern Slavery and Human Trafficking Statement

1. Purpose and Scope

The MILC Group Pty Ltd (MILC Group) and its subsidiary companies are 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 MILC Group, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

MILC Group expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with its values.

MILC Group will only do business with organisations who fully comply with this policy, or those who are taking verifiable steps towards compliance.

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.

2. Definition of Modern Slavery

Modern slavery can take many forms; it is a complex and multi-faceted problem. The Modern Slavery Act (MSA) 2018 covers four key criminal activities:

- Slavery: where ownership is exercised over an individual
- Servitude: involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which will not be tolerated but are not specifically referenced in the MSA, include, but are not limited to:

- Child labour: whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

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 colleagues to play a part and remain vigilant to the risk in all aspects of the MILC Group's business and business relationships.

3. Policy Statement

To underpin the commitments laid out in this policy, MILC Group aims to implement the following measures over the course of every financial year moving forward:

- The Company will conduct risk assessments to determine which parts of the business and which supply chains are most at risk from modern slavery so efforts can be focused on the areas that are most 'at risk'
- Where appropriate, as informed by the risk assessment, the Company will engage directly with new suppliers in respect of the Anti-Slavery Policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.
- Our contractual documentation will incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy.
- We also make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.

MILC Group and its suppliers specifically prohibit workers and agents from the following acts.

- Engaging in all forms of forced labour and human trafficking
- Withholding worker identity and immigration documents
- Using recruiters that do not comply with local labour laws in the applicable country
- Procuring commercial sex acts

Furthermore, MILC Group requires all employees and third parties to ensure the following

- Wages must meet applicable host country legal requirements. In any cases where there is no legal minimum wage, wages must be aligned with those of the prevailing sector.
- Document checks must be carried out for all employees prior to employment to confirm identification documents and the right to work based on legal standards.
- Employees must be provided with detailed and current work agreements that allow them to terminate their employment at any time with no associated financial penalty as long as reasonable notice is provided.
- Materials used in products produced for the MILC Group must comply with all modern slavery related laws of the applicable country where they are manufactured.

4. Responsibility for This Policy

The Executive Board has overall responsibility for this policy and in ensuring that the MILC Group complies with all its legal and ethical obligations.

The General Manager will have 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.

All Managing Directors are responsible for ensuring that their subsidiary complies with the provisions of this policy in the day to day performance of their roles.

5. Communication and Employee Awareness Training

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy and any supporting processes applicable to their role. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

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.

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes modern slavery, or if you have any other queries or concerns, these should be raised with your line manager OR the Company Secretary.

All colleagues will be expected to co-operate to the fullest extent 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 the senior management team.

7. Monitoring and Review

The Company Secretary will monitor the effectiveness and review the implementation of this anti-slavery policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering modern slavery.

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

This policy does not form part of any employee's contract of employment. This notice reflects the MILC Group's current practice. MILC Group will update the policy from time to time to reflect legal and operational requirements.

Reviewed and updated on 01 January 2023 for and on behalf of MILC Group Pty Ltd.
