



SNS

group



Modern Slavery Statement

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Modern Slavery Statement

Our annual Modern Slavery Statement is made under the Australian Modern Slavery Act (2018).

SNS Group Holdings Pty Ltd (SNS) is the parent company of the SNS Group and is headquartered in Perth, Australia. SNS is resolved to operating all of its business activities to the highest standards of business ethics and integrity.

We are committed to providing our employees a respectful environment, free from discrimination, abuse and exploitation.

There is no globally agreed definition of modern slavery rather the term is used to cover a range of exploitative practices including human trafficking, debt bondage, slavery, forced labour and child labour. We are committed to ensuring there are no modern slavery concerns in our business or supply chain.

Accordingly, we commit to assessing and monitoring the risks of modern slavery in our business through our own supply chain and taking action to eliminate such practices.



The SNS approach to monitoring modern slavery is as follows:

- Recognise the leverage we have to influence change within our community and consider how our actions and business practices could influence and contribute where supplier pricing is inappropriately low.
- Build meaningful relationships with external stakeholders by:
 - Providing awareness of modern slavery through training
 - Raising awareness of our expectations via client agreements
 - Identifying and responding to inappropriate practices
- Adopt a risk management approach with both internal and external stakeholders to identify areas where modern slavery may be present and monitor the risks where required.

Our company's policies include elements that address several areas that are central to how we promote ethical and responsible behaviour through our values:

- High ethical standards and leadership by example
- The safety of all employees and visitors to our sites
- Respecting our customers and delivering our promises
- Encouraging our people to reach their potential
- Workplace relations that value communication, consultation, co-operation

OUR COMMITMENT

SNS is committed to upholding human rights, fair working conditions and environmental protection.

In accordance with the expectations of our customers, the community, and the requirements of the law, we endeavour to always operate responsibly within the community and we expect the same from our suppliers.

Maintaining a reputation for the highest legal, moral and ethical standards in our dealings with our customers and we are committed to working with our suppliers to help improve their labour and environmental practices.

OUR PRINCIPLES

We expect our suppliers to support the ethical standards set out in this Statement with regard to workplace safety, environment, and fair pay and employment conditions.

These documents set out the standards that we expect all of our suppliers to comply with when producing and supplying products for SNS no matter where they operate in the world.

We recognise that full compliance with these criteria may take time for some suppliers, and we are committed to working with our suppliers to implement improvement plans and help them achieve compliance.

BRIBERY AND CORRUPTION

- We shall not engage in acts of bribery and corruption and shall not falsify documents and records.
- Labour Rights
- Employment is freely chosen;
 - There is no forced, bonded or involuntary prison labour; and
 - Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

WORKING HOURS

- Working hours comply with any Law and benchmark industry standards, whichever affords greater protection.



FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively;
- Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace; and
- Where the right to freedom of association and collective bargaining is restricted under Law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

WORKING CONDITIONS

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health in the working environment;
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers;
- Access to clean toilet facilities and to clean and drinkable water and, if appropriate, sanitary facilities for food storage shall be provided; and
- We will ensure that personal protective equipment is available and workers are trained in its use. Safeguards on machinery will meet or exceed local laws.

CHILD LABOUR

SNS supports ILO Convention 138 with regard to the appropriate age of workers and will not work with suppliers who use child labour.

Child labour refers to work that:

- Is mentally, physically, or morally harmful to children;
- Can negatively affect their mental, physical, or social development, and
- Interferes with their schooling:
 - by depriving them of the opportunity to attend school;
 - by obliging them to leave school prematurely; or
 - by requiring them to attempt to combine school attendance with excessively long and heavy work.

In short: child labour is work that deprives children of their childhood, their potential and their dignity, and is harmful to their physical and mental development.

LIVING WAGES

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income;
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid; and
- Deductions from wages as a disciplinary measure or any deductions from wages not provided for by Law shall not occur without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

DISCRIMINATION

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.



HARSH OR INHUMANE TREATMENT

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

ENTITLEMENT TO WORK AND IMMIGRATION

- Only workers with a legal right to work shall be employed or used by SNS;
- All workers, including employment agency staff will be validated by SNS for their legal right to work by reviewing original documentation; and
- SNS have processes to enable adequate control over agencies with regards to the above points and related legislation.

COMPLIANCE

SNS expects all its suppliers to comply with all aspects of this Statement and will be extending its coverage of audited facilities and compliance monitoring processes to include these standards.

This Statement is endorsed by SNS executive management, and its effectiveness reviewed annually.



Karl Depiazzi

Co-CEO

30 March 2024



Andrew Fenech

Co-CEO

30 March 2024

