

GMS – Anti-Slavery Policy




Incorporating Occupational Health and Safety
and Environmental and Social Responsibility Requirements

Version 1 | August 2020

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1 PURPOSE OF THE ANTI-SLAVERY POLICY


The aims of this policy are as far as is reasonably practicable to:

- (a) operate with the law, industrial instruments and other Grange policies and procedures.
- (b) direct and guide employees and contractors regarding their mutual obligations to personally comply with, and assist, Grange's compliance with above commitments;
- (c) limit the risk of Modern Slavery occurring within Grange, infiltrating its supply chains, or through any other business relationship;
- (d) demonstrate Grange's commitment to only doing business with contractors who fully comply with this policy or those who are taking verifiable steps towards compliance;
- (e) implement:
 - (i) appropriate plans, and processes to support and implement this policy;
 - (ii) monitoring, reviewing and verification of Grange's systems; and
 - (iii) corrective action where it is identified that Grange, employees, contractors and/or visitors to the workplace are not complying with their respective commitments and/or putting Grange, themselves and/or others at risk of non-compliance; and
- (f) operate with the law, industrial instruments and other Grange policies and procedures.

2 COVERAGE

- (a) This policy covers and applies to employees and directors:
 - (i) at the workplace (including any conduct of personal nature not related to work);
 - (ii) in the performance of work for or in connection with Grange; and
 - (iii) occurring outside the workplace or working hours if the acts or omissions:

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- (A) are likely to cause serious damage to the relationship between Grange and employees, contractors and visitors to the workplace;
- (B) are incompatible with employees, and contractors at the workplace's duty to Grange; or
- (C) damage or are likely to damage Grange's interests or reputation.


3 REQUIREMENTS

- (a) Persons covered by this policy are required to:
 - (i) comply with this policy as lawful and reasonable directions;
 - (ii) comply with any applicable law;
 - (iii) not directly or indirectly engage in or aid, abet or encourage behaviour in breach of this policy/ law; and
 - (iv) meet their duty of care obligations and be accountable for their own safety and the safety of others at the workplace.
- (b) Managers/supervisors are required to:
 - (i) promote this policy within their area of responsibility; and
 - (ii) take reasonable steps to ensure that any potential breaches of this policy are identified, taken seriously and acted upon appropriately.

4 RESPONSIBILITIES

- (a) Grange 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 those areas;
- (b) Grange will, where reasonably practicable and as informed by a risk assessment, engage directly with contractors in respect of this policy in order to gain a contemporary and accurate understanding of the measures those parties have in place to ensure slavery is not occurring within those businesses;
- (c) Grange will prepare and submit Modern Slavery documents in any appropriate format and as otherwise required by law;

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- (d) Grange will work collaboratively with contractors to identify and manage Modern Slavery risks and develop commercial, actionable and rights based solutions;
- (e) Grange will take reasonable steps to specifically prohibit Modern Slavery in its applicable business documentation;
- (f) Grange will take reasonable steps to reasonably consult with and, if necessary, require contractors to also specifically prohibit Modern Slavery in their applicable business documentation;
- (g) Grange will discontinue arrangements or not engage with contractors where it is reasonably apparent that such contractors have not taken reasonable steps to prevent or specifically prohibit Modern Slavery in their applicable business operations;
- (h) Contractors will take reasonable steps to specifically prohibit Modern Slavery in its applicable business documentation with Grange;
- (i) Contractors will take reasonable steps to prevent or specifically prohibit Modern Slavery in their applicable business operations with Grange;
- (j) Grange or their nominated delegate must comply with all other anti-slavery requirements prescribed by the law.

5 VARIATION

This policy may be reasonably varied, terminated or replaced by Grange in its sole discretion from time to time.

6 DEFINITIONS

In this policy:

Modern Slavery means:

- (a) any situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception;
- (b) incorporates conduct that would constitute an offence under existing human trafficking, slavery and slavery-like offence provisions set out in Divisions 270 and 271 of the Commonwealth Criminal Code; and

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- (c) encompasses slavery, servitude, the worst forms of child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services.

7 REFERENCE/ASSOCIATED DOCUMENTS

Document Number	Document Title or Information Source	Location

8 DOCUMENT CONTROL

Version	Date	Description	Author	Approved
1.0		Policy Created	A. Smith	