

Modern Slavery and Labour Standards Supplier Code

At Clipstone we are committed to operating our business in an ethical and honest way. As part of that commitment, we have in place systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

We require our suppliers and business partners to adhere to the principles in this Code, in accordance with our Anti-Slavery and Human Trafficking Policy. We expect you to require the same standards of your own suppliers, and business partners.

Code of Conduct: Principles

Workers shall not be subject to forced, prison, bonded, indentured, slave, trafficked or compulsory labour in any form, including forced overtime. All work must be carried out voluntarily and for fair compensation.

Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice in accordance with applicable laws.

Workers shall not be mentally or physically coerced to provide their labour.

Workers shall not have their identity or travel permits, passports, or other official documents or any other valuable items confiscated or withheld as a condition of employment.

Fees or costs associated with the recruitment of workers (including but not limited to fees related to work visas, travel costs and document processing costs) shall not be charged to workers whether directly or indirectly. Similarly, workers shall not be required to make payments which have the intent or effect of creating workplace slavery.

Workers shall have their terms of employment or engagement set out in a written document that is easily understandable. This written document shall include, but not be limited to, transparent terms with respect to wages, overtime pay, payment periods, working hours and rights in respect of rest breaks and holiday. Such written terms shall be provided to the worker in advance of them starting work.

There shall be no use of child labour. Nobody shall be employed under the minimum age. Subject to the overriding prohibition on the use of child labour, if workers under the age of 18 are employed then particular care shall be taken as to the duties that they carry out and the conditions in which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions.

Workers, their families, and those closely associated with them shall not be subject to harsh or inhumane treatment including but not limited to physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation. Migrant workers, their families and those closely associated with them should not be subject to discrimination due to their nationality.

Workers shall be free to file grievances to their employers about the employer's treatment of them and workers shall not suffer detriment, retaliation, or victimisation for having raised a grievance.

Workers shall be free to move without unreasonable restrictions and shall not be physically confined to the place of work or other employer-controlled locations nor shall they be confined by more indirect means.

Where it is necessary to recruit workers, who are engaged via a third party, such as an employment agency, then only reputable employment agencies shall be engaged. All such agencies must have the necessary licences and registrations under local laws.

Reporting of Concerns

Any person concerned about a breach of this Code or our Anti-Slavery Policy may report their concerns on a confidential basis to Marc Cowley, Richard Demarchi or Toby Dean. Individuals with concerns are encouraged to provide their name and contact details so that the issues that they raise can be investigated. However, we recognise that in some circumstances an individual will only be prepared to raise their concerns on an anonymous basis, and we commit to investigate anonymous allegations as thoroughly as possible and to take the necessary remedial action.

Contractors and their subcontractors are to ensure that the reporting methods outlined above are communicated to all workers.