



VALVE DISTRIBUTORS
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Modern Slavery Policy Statement

Modern Slavery - Statement of Intent

The purpose of this policy is to set out how Valve Distributors will deal with Modern Slavery within its supply chain, provide awareness of what is Modern Slavery and encourage individuals to be on the lookout for and report suspected acts of Modern Slavery. This policy will set out the guidelines Valve Distributors is to follow, the protection that is afforded to those that report acts of Modern Slavery and training on what is Modern Slavery.

Valve Distributors is dedicated to changing people's lives for the better and will in no way condone, support or contribute, either directly or indirectly, to Modern Slavery.

With the introduction of the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW) (the Acts), Valve Distributors is committed to assist with the eradication of Modern Slavery by implementing this policy and managing the risk with suppliers so as not engage in Modern Slavery.

Related Policy Guidelines or Documents

- Website Statement (TBD)
- Valve Distributors Contracts including provision requiring disclosure of modern slavery risks (in draft)
- Checklist for Suppliers (in draft)
- Modern Slavery Reporting template (TBD)
- Whistleblower Protection Policy

Audit / Evaluation

Document review and audits are to be carried out annually to comply with legislative requirements

Definition and Examples of Modern Slavery

Modern Slavery is defined in the Modern Slavery Act (NSW) 2018 as conduct which would constitute:

- a. any conduct constituting a modern slavery offence,
- b. any conduct involving the use of any form of slavery, servitude or forced labour to exploit children or other persons taking place in the supply chains of government agencies or nongovernment agencies.

Modern Slavery is defined in the Modern Slavery Act (Cth) 2018 as conduct which would constitute:

- a. an offence under Division 270 or 271 of the Criminal Code; or
- b. an offence under either of those Divisions if the conduct took place in Australia; or
- c. trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- d. the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Examples of what constitutes Modern Slavery is forms of slavery such as servitude, trafficking in persons, forced labour, debt bondage, forced marriages, sale of and/or sexual exploitation of children or sale of children for forced labour exploitation, where victims are forced to work out of fear of violence and/or intimidation.

Reporting

Valve Distributors will report to the Minister the actions it has taken to prevent Modern Slavery within its structure, supply chains and organisation, in accordance with the legislation.

Actions Valve Distributors will take to eradicate Modern Slavery within its Supply Chains

Valve Distributors is committed to making sure that it does not engage suppliers that breach Modern Slavery legislation by regularly reviewing supply agreements.

Valve Distributors is committed to holding its suppliers accountable to their commitment of eradicating Modern Slavery and will not knowingly engage suppliers that do not align with its position on enforcing basic human rights.

All Valve Distributors supply contracts will include a clause pertaining to Modern Slavery requiring the Supplier to:

- a. Provide commitments to eradicating Modern Slavery within its own supply chains;
- b. Warranting that it has not been convicted of a Modern Slavery offence; and
- c. Have completed its own due diligence on its supply chain.

Valve Distributors will conduct risk assessments to determine which areas of its supply chain are most at risk of Modern Slavery offences and implement risk minimisation strategies.

Valve Distributors will review supplier contracts in conjunction with the Acts and ensure terms in supplier contracts are consistent with and address the Acts' requirements.

Valve Distributors will perform due diligence on the supply chains of its suppliers.

Training

Valve Distributors will provide training to inform employees of this policy and what is considered Modern Slavery.

Protections

Valve Distributors will protect those individuals that report or identify Modern Slavery occurring within the organisation and supply chains.

If an employee, contractor, volunteer or related person to Valve Distributors is aware of Valvedistributors or a supplier or servicer provided that is breaching the Modern Slavery Laws, the individual should report the breach to their direct manager or if not able to do so, the next individual that is appropriate in the reporting chain of command. The individual may also make a report through Valve Distributor's Whistleblower Protection Policy and be afforded the protections under Whistleblowing laws and Valve Distributor's Policy.

Document Name	Modern Slavery Policy Statement
Document Type	Template
Service Sector/s	All Service Sectors
Version	1
Approval Date	5/05/2022
Approved By	Sales & Marketing Manager