

 <p><b>oncore</b></p> <p>Modern Slavery Policy</p>	<b>ISSUED BY:</b>	Legal & Compliance
	<b>APPROVED BY:</b>	Legal & Compliance
	<b>POLICY TYPE:</b>	Legal & Compliance
	<b>LAST UPDATED:</b>	May 2021

## 1. What is the purpose of this policy?

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Oncore Group Holdings (Oncore) is committed to human rights in the workplace and working with suppliers that are aligned to our values and operate in accordance with modern slavery laws. This commitment includes limiting the risks of modern slavery practices in our business and supply chains, respecting the dignity and worth of all employees, encouraging all employees to reach their full potential and providing equal opportunities to all employees. We are committed to the principles outlined in the *UN Guiding Principles on Business and Human Rights*.

This Modern Slavery Policy supports our annual Modern Slavery Statement that is registered on the Modern Slavery Register with the Australian Boarder Force and can be found online at:

<https://modernslaveryregister.gov.au/statements/3032>

## 2. Scope

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This Policy applies to Oncore, all persons working for or on behalf of Oncore, in any capacity including employees, contractors, consultants, those doing business with or for Oncore, others who may act on Oncore's behalf or any business in our supply chain. This policy applies to all Oncore office locations and wherever Oncore business is conducted. While this policy may not be any part of any contract you have with us, you are expected to comply with it.

## 3. What is modern slavery?

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Modern slavery is depriving a person of freedom for commercial gain and is a serious violation of fundamental human rights. Modern slavery is a term to describe a number of serious exploitive working conditions where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery can be complex and multi-faceted and can be difficult to spot.

Modern slavery can take many forms including:

- *Trafficking in persons* – arranging or facilitating the travel of another with a view to exploiting them
- *Slavery* - owning a person, trading in slaves or financing slave trading
- *Servitude* – obligation to provide service imposed by coercion
- *Forced marriage* - a marriage without free and full consent

- *Forced labour* - forcing a person to work by coercion or threats
- *Debt bondage* - a person works to pay off a large debt, for an unlimited time or where the value of the work is not applied to the debt
- *Child labour* – whilst not always illegal in the jurisdiction in which it takes place, it is not tolerated by us when it involves exploiting children, is likely to be hazardous, unsafe or interferes with education, health, wellbeing or social development.
- *Deceptive recruiting* - a recruiter charges a fee for the job offer, confiscates identity documents, deceives a person about personal freedom or their ability to leave the job

#### **4. What are indicators of modern slavery practices?**

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The below list contains some examples of indicators of Modern Slavery practices. This list is not exhaustive and does not necessarily mean there are modern slavery practices. Sometimes there may be other reasons or circumstances that indicate that something is not right.

Where are person:

- is not in possession of their own passport, ID or travel documents;
- is acting as though they are being instructed or coached by someone else;
- allows others to speak for them when spoken to directly;
- is dropped off and collected from work;
- is withdrawn or appears frightened or have physical indicators of slavery, such as injuries;
- unable to contact friends or family freely;
- has limited social interaction or contact with people outside their immediate environment;
- story contains obvious errors;
- acts with hostility or have difficulty in concentrating due to trauma;
- has few possessions;
- has little or no control over their finances or they are being significantly overcharged for their accommodation; and
- is living in a very poorly maintained and overcrowded place.

#### **5. Why we want to limit risks of modern slavery practices?**

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Oncore is committed to human rights in the workplace and working with suppliers that are aligned to our values and operate in accordance with modern slavery laws. We are committed to protecting our workers, our reputation and addressing modern slavery risks as required by modern slavery legislation.

## **6. What are our responsibilities?**

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We have prepared a Modern Slavery Statement as required by Australian law. We will endeavour to identify and address modern slavery risks in our business and supply chain and take steps to raise awareness of modern slavery risks, including by having this policy.

## **7. What are your responsibilities?**

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You must adopt policies and procedures to ensure that you address modern slavery in your operations and take all reasonable steps to ensure our business and supply chain are free of modern slavery practices. If you reasonably suspect there may be modern slavery, report it under this policy.

Despite your position or role and regardless of your business relationship with us, you must pay close attention to the high-risk areas identified in our Modern Slavery Statement, particularly supply chain and outsourcing.

Some areas of the business are likely to have more exposure than others, including procurement and sourcing, human resources, finance, risk, sustainability, projects, legal and leadership.

Examples of specific responsibilities include but are not limited to, participating in all training, leading by example by making appropriate checks on all employees and suppliers and remaining alert to indicators of slavery.

## **8. How do I report slavery concerns?**

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If you have a reasonably held suspicion of modern slavery practices, discuss your concerns with Oncore Head of Legal and Compliance, who will decide a course of action and provide any further advice.

If there is immediate danger call the police. Do not deal with the situation on your own, as dangerous criminals can be behind modern slavery and human trafficking.

Not all victims may want to be helped and sometimes, reporting a suspected trafficking case puts the potential victim at risk, so it is important that unless there is immediate danger, you discuss your concerns first before taking any further action.

## **9. Who is responsible for this policy?**

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Our Board of Directors are responsible for this policy and in ensuring Oncore complies with all its legal and ethical obligations.

This policy may be amended and updated from time to time by Oncore Legal and Compliance department to reflect legal and operational requirements.