

## Policy

### Modern Slavery

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#### Policy principles

Modern Slavery (as defined below) breaches the most fundamental freedoms and human rights of individuals. Sunman Energy Co., Ltd and its subsidiaries (**Sunman**) believe that Modern Slavery is never acceptable and are committed to implementing and enforcing effective systems and controls to identify, address and, where appropriate, remedy Modern Slavery risks in its operations, supply chains and investments.

Sunman expects the same standard from all its contractors, suppliers and other business partners (**Business Partners**).

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#### Meaning of Modern Slavery

- (a) The term 'modern slavery' describes situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom.
  - (b) Under the Modern Slavery Act and divisions 270 and 271 of the *Criminal Code 1995* (Cth) this includes:
    - (i) trafficking in persons, which is the recruitment, harbouring and movement of a person by means of coercion, threat, deception, fraud, and abduction for the purposes of exploitation through modern slavery. Exploitation includes:
      - (1) the prostitution of others or other forms of sexual exploitation;
      - (2) forced labour or services;
      - (3) slavery or practices similar to slavery;
      - (4) servitude; or
      - (5) the removal of organs;
    - (ii) slavery, which is where the offender exercises powers of ownership over the victim including:
      - (1) the power to make the person an object of purchase; and
      - (2) the power to use their labour in an unrestricted way;
    - (iii) servitude, which is where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work;
    - (iv) forced labour, which is where the victim is either not free to stop working or not free to leave their place of work;
    - (v) forced marriage, which is where:
      - (1) coercion, threats or deception are used to make a victim marry; or
      - (2) the victim does not understand or is incapable of understanding the
      - (3) nature and effect of the marriage ceremony;
    - (vi) debt bondage, which is where the victim's services are pledged as security for a debt (owed by the victim or by another person) and:
      - (1) the debt is manifestly excessive;
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- (2) the victim's services are not applied to liquidate the debt; or
  - (3) the length and nature of the services are not limited and defined;
  - (vii) deceptive recruiting for labour or services, which is where the victim is deceived about whether they will be exploited through a type of modern slavery.

*Note: Offences specified in clause (a) to (g) are criminal offences under division 270 and division 271 of the Criminal Code 1995 (Cth).*

- (c) Modern slavery can also extend to the worst forms of child labour, including situations where children are:
  - (i) exploited through slavery or similar practices, including for sexual exploitation;
  - (ii) engaged in hazardous work which may harm their health or safety; or
  - (iii) used to produce or traffic drugs.

*Note: For more detail see 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)*

- (d) The term 'modern slavery' is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery. These practices may escalate into modern slavery if not addressed.
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#### **Framework for addressing Modern Slavery**

Sunman will:

- undertake risk-based assessments of its supply chains, operations and investments to identify and address Modern Slavery risks;
  - include specific modern slavery provisions in contractual documentation with Business Partners, requiring them to conduct themselves in accordance with the standards of conduct specified below; and promote awareness of Modern Slavery amongst Sunman, including in making its employees aware of this policy and supporting its employees in identifying, addressing and remediating Modern Slavery.
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#### **Standards of conduct – Employees**

Addressing Modern Slavery is the shared responsibility of all who are bound to comply with this policy.

In performing their duties, the conduct of employees of Sunman must be informed by the policy principles above.

Examples of such conduct include:

- avoiding any activity that might lead to a breach of this policy;
  - treating concerns or issues raised about Modern Slavery with respect, impartiality and sensitivity;
  - where required, investigating and responding to allegations of modern slavery fairly and reasonably; and
  - reporting and appropriately escalating any issues of concern in accordance with the reporting and escalation procedures specified below.
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**Standards of conduct –  
Business Partners**

Sunman expects its Business Partners to:

- prohibit Modern Slavery in their operations and supply chains;
  - hold their own suppliers and business partners to appropriate standards and undertake risk-based assessments of their own supply chain to determine Modern Slavery risks;
  - remediate Modern Slavery risks and breaches; and
  - notify Sunman of any suspected or actual Modern Slavery in their operations or supply chains.
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**Reporting and escalation**

Should an employee become aware of any suspected or actual Modern Slavery, they should report it to their manager, the Head of Operations or the Chief Executive Officer at the earliest possible opportunity.

Should a Business Partner become aware of any suspected or actual Modern Slavery, they should report it to their Sunman contact or to the Sunman representative identified in any relevant contractual documentation.

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**Breach of policy**

For employees, breach of this policy will result in disciplinary action up to and including termination of employment.

For Business Partners, breach of this policy may prejudice the relationship with Sunman, constitute a breach of contract or result in the exercise by Sunman of any other rights under any contractual documentation with the Business Partner.

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**Effective date and review  
date**

This policy takes effect on 21 May 2021.

It is due for review by 21 May 2022.

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**Who is affected**

All Sunman employees, contractors, agents, suppliers, business partners and any other entity which is bound to follow this policy by the terms of an agreement with Sunman.

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**Contact**

For more information contact your Manager, Head of Operations or Chief Executive Officer.

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**Related documents**

Employees are encouraged to read this policy in conjunction with other relevant Sunman policies, including:

- Code of Conduct;
  - Workplace Health and Safety Policy; and
  - Workplace Anti-Bullying & Anti-Harassment Policy.
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**Communications**

This policy is available on Employment Hero.

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