



MODERN SLAVERY POLICY

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Pacific Asia Express is committed to protecting our employees' rights and upholding the highest human rights, ethical, and anti-slavery standards. We believe in treating people with dignity and respect, and we will not tolerate discrimination and harassment.

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1. INTRODUCTION

1.1. COMMITMENT

Pacific Asia Express Pty. Ltd. (the “Company”) is committed to upholding our employees' rights and ensuring we have the highest human rights, ethical, and modern slavery standards. We believe in treating people with dignity and respect, and we do not tolerate discrimination or harassment. We aspire to be an equal-opportunity employer. We have a programme in place to improve and promote our employees' health and well-being. We strive to create and maintain a diverse workforce as well as a safe and inclusive environment for all. We seek to continually raise our employees' awareness and knowledge of human rights, including labour rights, and encourage them to speak up, without fear of retaliation, about any concerns they may have, including through our grievance channels.

1.2. PURPOSE

This policy affirms the Company's commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations. This Policy also supports the intent of international conventions, treaties, and protocols relevant to combatting modern slavery and the Modern Slavery Act (Cth) 2018.

1.3. SCOPE

This policy applies to anyone involved in our business, including employees, directors, officers, labour hire staff, contractors, suppliers and other representatives of our company or any business in our supply chain.

While this policy is not part of any contract you may have with us, you are expected to comply with it. If you do not comply with this policy, we may end our business relationship with you, and if you are an employee, you may face disciplinary action, up to and including dismissal.

As part of the Company's commitment to eliminating modern slavery, contractual provisions may be implemented in situations with elevated risks of inadvertently contributing to modern slavery, and where there have been instances or allegations of human rights abuses.

The Company is committed to working with stakeholders and suppliers to establish a visibility over supply chains and a reporting framework in relation to modern slavery. The Company understands that, as part of this process, risks and actual instances of modern slavery may be uncovered. The Company understands that taking a 'zero tolerance approach' can do more harm than good to victims of modern slavery, and instead will endeavour to exert commercial pressure where possible to improve worker conditions in the event that modern slavery activities are reported in our supply chains.

2. DEFINITIONS

Company means Pacific Asia Express Pty Ltd (ACN 051 866 409).

Modern Slavery, for the purposes of this policy, is defined as six types of serious exploitation, as outlined in Section 3.1.

Operations is defined as activity undertaken by Pacific Asia Express.

People include any current employee, director, officer, labour hire staff, contractor, or other representative of our business or of any business in our supply chain.

Suppliers are defined as any company or individual who provides us with goods or services, including subcontractors, agents, related entities, and consultants.

Supply chains are defined as the service and products as well as labour that contribute to PAE's own products and services. This includes products and services sourced in Australia or abroad, as well as indirect suppliers.

The Modern Slavery Act 2018 (Cth) means the Commonwealth legislation (the Act) enacted by the Australian Parliament on November 29, 2018 (which may be amended from time to time).

3. GUIDELINES

3.1. WHAT IS MODERN SLAVERY?

Modern slavery is the practice of depriving a person of freedom for commercial gain and in violation of fundamental human rights.

It describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Modern slavery involves serious exploitation. Not all instances of sub-standard working conditions or the underpayment of workers may constitute modern slavery, however they can increase the risk of modern slavery and may be unlawful for other reasons.

Modern slavery can take many forms including:

- Slavery - owning a person, trading in slaves or financing slave trading (i.e., human trafficking);
- Forced labour - forcing a person to work by coercion or threats;
- Forced marriage - a marriage without free and full consent - e.g., due to lack of understanding or duress/coercion;
- 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;
- 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;
- Child labour - not always unlawful but not tolerated by us when it involves exploiting children, depriving them of education, and/or making them work in unsafe working environments.

Modern slavery can be complex and multi-faceted and can be difficult to spot.

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 indicators of other compliance issues which may amount collectively to modern slavery. These practices may also escalate into modern slavery if not addressed.

3.2. WHAT ARE INDICATORS OF MODERN SLAVERY PRACTICES?

Modern slavery indicators may include where a person:

- is not in possession of their own passport, identity 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 has physical indicators of slavery, such as injuries;
- is 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 has difficulty in concentrating due to trauma;
- has few possessions;
- has little or no control over their finances or no access to a bank account, or they are being significantly overcharged for their accommodation; and
- is living in a very poorly maintained and overcrowded place.

These indicators are not exhaustive and do not necessarily mean there are modern slavery practices. Sometimes there may be other reasons or circumstances that indicate that something is not right.

3.3. WHY DO WE WANT TO LIMIT RISKS OF MODERN SLAVERY PRACTICES?

Protecting our workers and our reputation, and actively identifying where vulnerable people may be exploited through modern slavery practices, makes good humanitarian and business sense.

3.4. RESPONSIBILITIES

3.4.1. COMPANY'S RESPONSIBILITY

PAE will endeavour to:

- prepare a modern slavery statement as required by Australian law;
- identify and address modern slavery risks in our business operations and supply chain; and
- take steps to raise your awareness of modern slavery risks, including by having this policy.

As part of the preparation of a modern slavery statement, the Company will conduct risk assessments to determine which parts of our business and which supply chains are most at risk from modern slavery.

Where appropriate, as informed by the risk assessment, the Company will engage directly with new and existing suppliers to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses or their supply chains.

PAE will also work at updating contractual documentation to incorporate specific prohibitions against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy. Such provisions will require contracted suppliers to hold their own suppliers to the same standards.

3.4.2. RESPONSIBILITY OF OUR PEOPLE AND SUPPLIERS

Our people and suppliers must take all reasonable steps to ensure our business and supply chain is free of modern slavery practices.

However senior you are, and regardless of the business relationship with us, anyone must pay close attention to the high-risk areas identified in our Modern Slavery Statement, particularly supply chain and outsourcing in jurisdictions without adequate safeguards.

Some areas of any 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:

- participating in training in relation to modern slavery, including in this policy;
- leading by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working with us;
- remaining alert to indicators of slavery (see above);
- using only approved contracts which include modern slavery clauses; and
- obeying our instructions regarding modern slavery.

Turning a blind eye is unacceptable and if you reasonably suspect there may be modern slavery or practices that may constitute a high risk of modern slavery, you should report it under this policy.

3.5. HOW TO REPORT MODERN SLAVERY CONCERNS

If you have a reasonable suspicion that modern slavery is taking place, please follow the steps outlined in our Whistleblowing Protection Policy at <http://pae.com.au/whistleblower-reporting/>.

If there is immediate danger call the local authorities, such as police — do not tackle a situation on your own as dangerous criminals can be behind modern slavery and human trafficking.

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 with the Risk and Compliance Manager before taking any further action.

Keep your eyes and ears open—your awareness and actions may stop someone from being exploited or abused.

4. POLICY RESPONSIBILITY

This policy will be approved by the Deputy Management Director. Any reports of modern slavery raised in accordance with this policy and the Whistleblowing Protection Policy will be received and reviewed by the Deputy Management Director and the Executive team.

5. MONITORING AND REVIEW

The Risk and Compliance manager is responsible for reviewing of the policy on an annual basis or earlier if laws governing Modern Slavery change, necessitating amendment to the Policy, in which case the Policy must be updated and submitted to the Deputy Managing Director for review and approval.

6. ACCESSABILITY TO THIS POLICY

This policy will be made available to all Company employees, directors, officers, labour hire staff, contractors, or other representatives of our business or of any business in our supply chain by the following means:

- The policy will be published on The Bridge (intranet).
- On implementation, the policy will be communicated to all employees, directors, and officers by email.
- The policy will be communicated to new employees as part of their Induction.

This policy will be made available to the public via a link on our Company website.

7. INTERNAL REPORTING

Human Resources will keep a record of all modern slavery concerns raised in accordance with this policy and the Whistleblowing Protection Policy. A summary of concerns will be provided to the Executive Team on a quarterly basis. The summary will include information on:

- the status of any ongoing investigations; and
- the results of any completed investigations and actions taken as a result of those investigations.

Reports or investigations that pose an unanticipated risk will be immediately reported to the Executive team.

8. TRAINING AND AWARENESS

PAE will provide training and communication on this, and all relevant policies, including our Supplier Code of Conduct Policy, PAE contractual terms that include Modern Slavery clauses. Our Company will also help our employees and business partners to conduct a due diligence process in order to better understand the causes and consequences of modern slavery, as well as our approach to reducing the risk of modern slavery within our supply chains and operations.

9. RELATED LEGISLATION, POLICIES AND DOCUMENTATION

9.1. LEGISLATION

Modern Slavery Act (Cth) 2018. Available at <https://www.legislation.gov.au/Details/C2018A00153>

9.2. POLICIES

The Company has implemented the following policies and procedures to address and reduce the risk of modern slavery in the Company's operations and supply chains:

- Whistleblower Protection Policy;

- Employee Handbook;
- Work Health and Safety Policy;
- Conflict of Interest Policy;
- Vendor Agreements to be signed by new vendors; and
- Supplier Code of Conduct.

The updated policies are available on The Bridge (Intranet).

9.3. OTHER DOCUMENTATION

- Guidance for reporting entities (2018). Available from <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reportingentities.pdf>
- UN: Guiding Principles on Business and Human Rights
https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf
- Global Slavery Index provides Country Studies breaking down geographical risks of Modern Slavery
<https://www.globalslaveryindex.org/2018/findings/country-studies/overview/>