



<b>Policy Title:</b>	<b>Modern Slavery</b>
<b>Effective Date:</b>	<b>1<sup>st</sup> January 2020</b>
<b>Policy Owner:</b>	<b>Human Resources</b>
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## 1.0 Introduction

Dunlop Flooring takes its compliance with its statutory obligations seriously.

This document is directed to (amongst other things) assist Dunlop Flooring to comply with its obligations under the Modern Slavery Act.

Dunlop Flooring has a zero-tolerance approach to Modern Slavery within its business and supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place in its own business or in any of its supply chain.

## 2.0 Scope & Coverage

This Anti-Slavery Policy applies to all employees of Dunlop Flooring.

This Policy should also be read in conjunction with Dunlop Flooring’s Code of Conduct which serves as a guide for how to conduct yourself as a member of the Dunlop Flooring team. It is critical that you comply with the obligations set out in this document.

Modern Slavery can cause genuine and significant harm to the individuals affected and there are significant reputational, financial, market and operational risks for Dunlop Flooring if Modern Slavery risks are not properly detected and addressed.

This document sets out important steps that Dunlop Flooring will take in response to identifying a Modern Slavery risk.

You must familiarise yourself with this document to assist Dunlop Flooring in effectively carrying out its duties in compliance with the Modern Slavery Act.

## 3.0 Overview

Dunlop Flooring values human rights and is committed to ensuring that all business is conducted according to ethical, professional, and legal standards in a fair, honest, and open manner.

Modern Slavery is a crime and a violation of fundamental human rights.

It takes various forms, such as:

- slavery: one person treats another as though he or she owns that person, and that person is deprived of his or her freedom.
- servitude: a person is coerced to provide services, is forced to live on another person's property and cannot change his or her condition.
- forced labour: a person is forced to involuntarily work or to provide a service without remuneration under the menace of a penalty.
- trafficking in persons (including trafficking of orphanage children): a person arranges or facilitates the travel of another person to be exploited, without that person's knowledge or consent. This can be even where the person consents to the travel as they may have been deceived or unduly influenced.
- forced marriage: a person enters a marriage without freely and fully consenting, because he or she was coerced, threatened, or deceived or otherwise incapable of understanding the nature and effect of the marriage ceremony.

In addition, the definition of "modern slavery" in the Modern Slavery Act 2018 (Cth) (Modern Slavery Act) includes:

- child labour: children below 12 years of age undertaking at least one hour of economic activity or 28 hours of domestic work or children aged between 12 and 14 years of age undertaking at least 14 hours of economic activity or 42 hours of domestic work and economic activity combined.
- debt bondage: a person's pledge of labour or services as security for the repayment of a debt or other obligation, but there is no hope of repaying the debt. The services required to repay the debt, or the time in which to repay the debt, may be undefined.

## 4.0 Modern Slavery Policy

Dunlop Flooring employees, contractors, subcontractors, vendors, suppliers, partners, representatives, agents, and others through whom Dunlop Flooring conducts business with must not engage in any practice that constitutes any form of Modern Slavery.

This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Using forced labour in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment or offering of employment/contract positions to candidates; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs, any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place.
- Charging applicants / candidates recruitment fees.
- If required by law or contract, failing to provide return transportation, or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country's housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

## 5.0 Audits

All of Dunlop Flooring's employees and third parties through whom Dunlop Flooring conducts business are required to fully and promptly cooperate with the internal and external auditors and investigators of Dunlop Flooring, and must respond fully and truthfully to their questions, requests for information, and documents.

Any failure by an employee to completely cooperate, or any action to hinder an investigation or audit, including for example, hiding, or destroying any information or documentation, providing false answers or false information, or deleting emails or other documents, may be grounds for disciplinary action, up to and including termination.

## 6.0 Reporting

Employees are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that you become aware of.

Complaints will be kept confidential and will be dealt with appropriately.

## 7.0 Breaches

Any employee who breaches this Policy by engaging in or conspiring to engage in any Modern Slavery conduct will face disciplinary action.

This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and, if warranted, legal proceedings may be brought against the employee.

## 8.0 Key Contacts

If you believe that a breach of this Policy has occurred or is likely to occur, you must notify your manager and the Managing Director as soon as possible.

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