



ENVIRONMENTAL CLEAN  
TECHNOLOGIES LIMITED

## Modern Slavery Policy

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Version 1

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## 1. Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Environmental Clean Technologies Limited ["ECT"], we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We are taking concrete steps to tackle modern slavery, as outlined in this Modern Slavery Policy (the Policy).

## 2. Coverage

This policy applies to all employees, contractors, and suppliers of ECT (ACN 009 120 405), and its subsidiaries including the below:

- Environmental Clean Technologies Limited [ACN 009 120 405]
- ACN 109 941 175 Pty Ltd [ACN 109 941 175]
- Asia Pacific Coal & Steel Pty Ltd [ACN 111 577 041]
- ECT Coldry Pty Ltd [ACN 137 225 748]
- Enermode Pty Ltd [ACN 119 506 393]
- ECT Finance Ltd [ACN 619 944 099]
- ECT Waste-to-Energy Pty Ltd [ACN 633 874 790]
- Environmental Clean Technologies Development & Services India Pvt Ltd [registered in India].

## 3. Purpose

This Policy affirms our 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. It is consistent with our ethical framework, that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations.

This Policy also supports the intent of international conventions, treaties, and protocols relevant to combatting modern slavery and the Australian Modern Slavery Act 2018<sup>1</sup>.

## 4. Definitions

**Modern slavery** for the purposes of this policy is defined by the Australian Modern Slavery Act 2018 to include eight types of serious exploitation and which can be understood as:

1. **trafficking in persons**, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery, or practices similar to slavery, servitude, or the removal of organs
2. **slavery**, which is where the offender exercises powers of ownership over the victim

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<sup>1</sup> Modern Slavery Act (Cth) 2018. Available from: <https://www.legislation.gov.au/Details/C2018A00153>

3. **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
4. **forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work
5. **forced marriage**, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony
6. **debt bondage**, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined
7. **the worst forms of child labour**, which involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
8. **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.

It can also extend to:

- entering into a commercial transaction involving a slave
- exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading
- conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it).

**Indicators of modern slavery** include:

- Individuals not being paid for the work they undertake
- Individuals being held in debt-bondage (being told they "still" owe money after having paid off a previous debt)
- An individual's passport being held by their "employer" in order to keep the individual at work
- Multiple benefit claimants having their benefits being paid into the same account
- An individual not having freedom of movement (i.e. Passport being taken)
- Clear exploitation of an individual by another for financial or sexual gain.

**Suppliers** is defined as any organisation or person who provides us with goods or services, including their subcontractors, agents, related entities and consultants.

**Supply chains** is defined as the products and services (including labour) that contribute to our own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

## 5. Commitment

We are committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation as continued in the definition of Modern Slavery in any part of our organisation or in our supply chain.

We welcome transparency and this Policy sets out for the public, our stakeholders, suppliers, and employees the approach we are taking in this regard.

## 6. Approach

We will work proactively to reduce modern slavery within our supply chains and operations and expect all organisations we engage with to do the same.

### Recruitment

At the point of recruitment, appropriate checks in accordance with relevant laws are carried out on prospective employees and our HR team works closely with the relevant teams in the local territories to make sure that pay and conditions are appropriately managed.

### Operations

We maintain a Modern Slavery Policy (this Policy) outlining our approach to reducing the risk of modern slavery practices within our supply chains and operations. The Policy provides guidance on the we take to work with suppliers to reduce risks and the range of supports available for when we or a supplier becomes aware that someone is at risk of or affected by modern slavery practices.

When existing policies undergo policy review or new policies are under development, policy owners are required to identify existing modern slavery commitments that can be enhanced, or where modern slavery protections can be incorporated.

### Risk assessment

We conduct an annual risk assessment of our supply chain by considering:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

### Suppliers

Suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event Suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations

they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify us as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

### Supplier due diligence

We conduct due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to attest that:

- They don't use any form of forced compulsory or slave labour

- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

### **Supply Chain**

In accordance with our commitment to acting ethically and with integrity in all our business relationships, we intend to implement effective systems and controls to ensure Modern Slavery is not taking place in our supply chains. This will involve ensuring the effective communication and reinforcement of relevant policies, which give a clear view of the values and principles that underpin all our work and that we expect all persons involved in our business and supply chain to adhere to.

### **Training and development**

We will provide our employees with communications and training and development opportunities to enhance their understanding of the causes and humanitarian impact of modern slavery, the Modern Slavery Policy, and our approach to limiting the risk of modern slavery within our supply chains and operations.

People with high purchasing responsibilities are provided additional training. People who initiate and/or periodically review relationships with third parties are provided with training to apply the relevant due diligence processes.

## **7. Responding to concerns**

### **Reporting unethical or unlawful conduct**

A key part of supporting ethical standards is enabling our people and other people (including Suppliers and Partners) to feel free and safe to speak up when there are reasonable grounds to suspect that our Company or our people are not acting ethically or in accordance with laws and obligations. Concerns about compliance or ethical issues or illegal or unethical activities are to be reported in accordance with our Whistleblower Policy ([link](#)).

### **Responding to concerns of modern slavery practices**

The often-hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. It is important to respond in a way that is safe, ethical and respects the dignity and rights of the person at risk or affected by modern slavery practices.

There are a range of supports available for when a person becomes aware that someone is at risk of or affected by modern slavery practices, regardless of if this occurs within our supply chains and operations or in the broader community.

Our Managing Director, Company Secretary, or any ECT Director can be contacted for further information, advice, and options available when a person is at risk of affected by modern slavery practices via e-mail, or by phone, or any other means available.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 237 to discuss or report a suspected case. Contact can be made anonymously.