

Anti-Modern Slavery Policy

1. Introduction

1.1 Policy Statement

Kiama Community College Ltd affirms its commitment to end all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.

We respect the human rights of our employees, students and those of our suppliers and partners.

Our code of conduct sets out the standards of behaviour we expect of our business and people. We expressly set out our commitment to human rights and that we reject any form of modern slavery. We are committed to implementing the Anti-Modern Slavery Policy and to setting clear expectations for our employees, students, contractors and volunteers in its content and application.

This is consistent with our policies and procedures 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 Modern Slavery Act 2018

1.2 Scope

This Anti-Modern Slavery Policy applies to:

- All staff, procurement and activities under the control of Kiama Community College Ltd, including Community College operations and Shoalhaven River College school operations.
- All Employees, Students, Volunteers, Contractors and Visitors within Kiama Community College Ltd or suppliers engaged by Kiama Community College Ltd.

1.3 Definitions

Modern slavery occurs when a vulnerable individual or group are exploited for commercial or personal gain. Factors such as poverty or economic hardship, limited access to education, forced migration, discrimination, conflict, and corruption can make people vulnerable to slavery and exploitation. Perpetrators use tactics such as intimidation, coercion, manipulation, and deception to enslave victims. Modern slavery can occur in any country, any industry, to anyone.

Modern slavery examples can include slavery, servitude, slave trading, sexual servitude, forced labour, forced marriage, debt bondage, human trafficking and child labour.

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 Kiama Community College's products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

Modern Slavery Act 2018 is Australian Government Legislation.

Student, any person, including children, who attends or participates in Kiama Community College Ltd's activities.

Worker, any employee, volunteer or contractor engaged to provide or support the training and services provided by the organisation.

Volunteer, any unpaid person over the age of 16 who is invited to assist in the training and services provided by the organisation Vulnerable Person, any person who is or may be in need of community care services by reason of mental or other disability, age or illness.

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2. Policy Review

This Policy will be reviewed biennially.

3. Obligations

We expect all existing and new Suppliers to comply with the principles set out in our Code of Conduct, the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed. Suppliers must use their 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 Kiama Community College Ltd as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

KCC Ltd acknowledges that entities need to report under the Commonwealth Act if they are an Australian entity or carry on business in Australia with a minimum annual consolidated revenue of \$100 million.

3.1 Risk Considerations

The following risk factors may be an indication or precursor to modern slavery, and of which KCC Ltd leadership will remain constantly vigilant in our own operations and that of our suppliers. The presence of multiple risk factors, occurring at once, heightens the risk of modern slavery.

- Large proportion of casual or temporary workers.
- Large proportion of migrant workers, particularly from developing countries. Migrant workers are more vulnerable because they may lack knowledge about local worker's rights, where to go for help, or experience a language barrier. Employing migrant workers may also be an indication of human trafficking.
- Base skilled or low skilled workers
- Use of third-party labour hire services and recruitment agencies
- Sourcing products/services from high risk countries (e.g. limited respect for human rights or labour rights, weak rule of law, dictatorship)
- Substantially lower prices or faster turnaround times than competitors
- High risk industries (e.g. mining, agriculture, apparel)
- Immature, weak, or non-existent company processes and policies
- Limited visibility over suppliers or subcontractors
- 'Hidden' workers such as those working in rural areas, at night, or in otherwise low visibility settings
- Multiple risk factors coexisting

KCC Ltd leadership will remain constantly vigilant in our own operations and that of our suppliers of the following "red flags" that may indicate the presence of modern slavery in our operation or in the operation of our supplies:

- A company's refusal to acknowledge or investigate claims of exploitation or mistreatment.
- A lack of transparency about company practices, subcontracting arrangements, past audit results, or sanctions.
- Refusal to participate in audits or on-site inspections.
- Workers who appear frightened, withdrawn, or reluctant to speak to authorities.
- Company involvement in 'economic relief' or 'labour transfer' programs in countries with poor human rights records. These programs can involve forced migration of vulnerable populations, forced labour, and poor working conditions.

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- Company involvement in vocational training or work experience programs in countries with poor human rights records. These programs can involve forced and unpaid child labour.
- Workers paying recruitment fees or 'deposits' in order to secure their position.
- Companies withholding worker's pay or making excessive deductions.
- Holding workers to unrealistic production quotas. This tactic is used to 'justify' withholding payment or forcing workers to work unpaid overtime to complete their quota.
- Confiscation of workers identity documents
- Restriction of movement or association. This may include workers living on-site or in company provided accommodation that they are not free to leave, or restricting communication between workers and their families or unions.

3.2 Responsibility

The core expectations of our organisation require us to treat all people with fairness and dignity and to care for those who are less powerful and in need of nurture and protection. Concerns about compliance or ethical issues or illegal or unethical activities concerning modern slavery are to be reported to the CEO at Kiama Community College Ltd.

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. In an emergency and if someone is in immediate danger call triple 000 for police assistance

3.3 Legal

All relevant organisations within Australia are bound by Federal and State legislation and principles established through common law. Kiama Community College Ltd is committed to adhering to all relevant legislation.

KCC Ltd's Anti-Modern Slavery policy is based on the *Modern Slavery Act 2018* (Cth) (Commonwealth Act).

4. Policy Version and Revision Information

This Policy will commence from the effective date below. It replaces previous policies, if any, relating to modern slavery. The College reserves the right to vary, replace or terminate this Policy from time to time.

Policy Authorised by:	Board
Effective date of Original Version:	12 December 2023
Policy Maintained by:	Chief Executive Officer
Version Number/Effective date:	1.0
Review Date:	December 2025

5. References

<https://fairsupply.com.au/modern-slavery-a-brief-summary>

<https://www.legislation.gov.au/Details/C2018A00153>

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