



Modern Slavery Policy



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Modern Slavery Policy

1. The Company.

Milspec & GSE Holdings Pty Ltd

Trading as Milspec Services Pty Ltd and GSE Services Pty Ltd

operating at

Unit 2, 99 Spencer Rd,

Carrara, QLD 4211

Australia

2. Purpose.

The Company Policy is intended to provide an awareness of the risks of Modern Slavery to the company, employees and shareholders. The company is committed to ensuring there is no modern slavery or any scope for modern slavery in our supply chain or in any part of our business operations.

Note: The company is not legally required to provide an annual statement, or formally report under the current

3. Responsibility.

It is the responsibility of all people within the company to declare any such knowledge of or concern regarding Modern Slavery to their upstream manager who will consult with the Compliance Manager.

Where applicable the information and or concern will be elevated to the Management Team.

This Policy is reviewed with all staff at initial publication, change of policy and included as part of the induction process for new staff.

4. Monitoring, Review and Continuous Improvement.

The Policy is reviewed at minimum by inclusion within the scheduled six-month Management Reviews, or as required from time to time. Where review determines an update is required, the update is reviewed and published within the Quality Management System (QMS) in accordance with QMS document control procedures.

5. Company Operations.

By operating and employing all staff in a manner which is compliant with Local, State, Federal Laws and Regulations there is no scope for modern slavery within the company internal business operations.

The company operates and is committed to a Total Quality Management System which covers all aspects of compliance relevant to the operation of the company.

6. Supply Chain.

The company operates within the scope

“The sourcing and supply of components, systems, inventory, and ground support equipment for aviation applications, (including the management of maintenance, overhaul, and repairs) to defence forces, defence force contractors and commercial organizations.”

While it may be difficult to ensure a 100% risk free supply chain, the following risk identification and mitigation factors apply.

- a. Training of all staff to create awareness of Modern Slavery and the risks within the supply chain.
- b. Lower risk supply chain environment based around Aerospace and Defence.
- c. Sources of supply in virtually all cases are restricted to those already approved by the defence customer base.
- d. A detailed vendor verification process within the QMS (Quality Management System).
- e. High risk countries have been identified

Afghanistan, Bangladesh, Burundi, Cambodia, Central African Republic, China, Democratic Republic of Congo, Ethiopia, Eritrea, India, Iran, Mauritania, Myanmar, Nigeria, Pakistan, Russia, South Sudan, Thailand.

Sources of supply within these countries are not to be procured from, either directly or indirectly without first consulting the Compliance Manager. The Compliance Manager may, if required, be transferred to the Management Team.

Should there be no other option available, the Compliance Manager is to ensure that appropriate due diligence is carried out prior to any procurement taking place.

7. Reporting and Remedial Actions

Where an instance is suspected, all procurement activity either directly or indirectly with the entity concerned is to cease and be reported to the Compliance Manager.

The Compliance Manager will inform other senior management and take appropriate steps to confirm or deny. In the first instance via a formal letter and supplier questionnaire in accordance with the Australian Government Home Affairs guidelines.

No further actions are to be taken without further consultation with either the AFP (Australian Federal Police) and or other expert legal advice due to the legal complexities involved.

8. What is Modern Slavery?

Extract from [Attorney Generals Department](#)

“Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom”

Practices that constitute modern slavery can include:

human trafficking

slavery

servitude

forced labour

debt bondage

forced marriage, and

the worst forms of child labour

Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. These practices are also harmful and may be present in some situations of modern slavery. For more information on workplace rights and obligations in Australia, visit the Australian Government Fair Work Ombudsman website.

Modern Slavery Policy

Modern slavery can occur in every industry and sector and has severe consequences for victims. Modern slavery also distorts global markets, undercuts responsible business and can pose significant legal and reputational risks to entities.

Entities have a responsibility to respect human rights in their operations and supply chains, as outlined in the United Nations Guiding Principles on Business and Human Rights. This includes taking steps to assess and address modern slavery risks.

Taking action to combat modern slavery also makes good business sense. Entities that take action to combat modern slavery in their operations and supply chains can protect against possible business harm and improve the integrity and quality of their supply chains.

9. External references

[Attorney-General's Department Modern Slavery](#) - website

[Fair Work Australia](#) - website

[Queensland Government Employee rights, entitlements and pay](#) - website

[WorkSafe.qld.gov.au](#) – website