



Modern Slavery Policy

Ref [Attorney Generals Department](#)



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1. The Company.

Milspec & Ground Support Group Pty Ltd, trading as Milspec Services Pty Ltd and GSE Services Pty Ltd hereafter referred to as the company operating at Unit 2, 99 Spencer Rd, Carrara, QLD 421, 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, (The reporting requirement applies to commercial and not for profit entities with annual consolidated revenue of at least AU\$100 million).

3. Responsibility.

It is the responsibility of all persons within the company to declare any such knowledge or concerns to their upstream manager who will consult with the Compliance Manager.

This Policy is reviewed with all staff at initial publication within the QMS and included as part of the induction process for new staff. It contains a sign off section to acknowledge having been read and understood.

4. Monitoring, Review and Continuous Improvement.

The Policy is reviewed at the scheduled Management Reviews.

Where review determines an update is required, the update is reviewed and published within the QMS IAW QMS document control procedures,

5. Company Operations.

By operating and employing all staff in a manner which is compliant with Local, State and Federal Laws and Regulations which includes for example the Work Health and Safety Act 2011 QLD, the guidance of [Home | WorkSafe.qld.gov.au](#), and [Fair Work Australia](#) there is no scope for modern slavery within the company internal business operations.

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

6. Supply Chain.

While it may be difficult to operate a 100% risk free supply chain, by ensuring awareness of the risks and understanding of what Modern Slavery is, risk will be reduced.

The company of less than 20 personal operates within the below 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.”

Given the broad nature of the company’s supply chain, it is not possible to carry out a formal due diligence form of appraisal for all.

Risk is identified and mitigated by the following;

- a. Source of supply is in most instances at the direction of the customer the majority of which are either ADF, NZDF or their Prime Contractors.
- b. The QMS Procurement Procedures Manual, Work Instruction 2D, Vendor Approval, outlines a two-tier system of Vendor Approvals.

Wherever possible Tier Two Suppliers are to be used which are defined as having appropriate third-party authorizations\certifications.

- c. In most cases supporting documentation is required enabling transparency of the supply chain.
- d. The following countries have been identified as high risk and not to be procured from either directly or indirectly without first advising the company Compliance Manager.
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.
Afghanistan, Bangladesh, Burundi, Cambodia, Central African Republic, China, Democratic Republic of Congo, Ethiopia, Eritrea, India, Iran, Mauritania, Myanmar, Nigeria, Pakistan, Russia, South Sudan, Thailand.

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 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.



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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. Acknowledgement and Employee Sign Off

I understand and will abide by this Modern Slavery Policy.

Employee Name

Signature

Date