
MODERN SLAVERY POLICY

PSION





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DOCUMENT CONTROL

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CONFIDENTIALITY

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1 POLICY STATEMENT

This policy reflects PSION's commitment to zero tolerance for modern slavery in any part of our business operations or supply chain.

We are committed to acting ethically and with integrity in all business dealings and relationships. As part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.

Our business also expects its service providers, suppliers and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or within its supply chain.

2 SCOPE

Applies to all staff, contractors, volunteers, interns and persons engaged to work for PSION, at all locations during work-related activities.

Applies to all partners, vendors, suppliers and other entities who form part of PSION's supply chain.

3 DEFINITIONS

WHAT IS MODERN SLAVERY?

The term 'modern slavery' describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats and deception can be explicit or implicit.

The Modern Slavery Act 2018 (Cth) defines modern slavery as including eight types of serious exploitations; trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.

The worst forms of child labour means extreme forms of child labour that involve the serious exploitation of children, including through enslavement or exposure to dangerous work. The worst forms of child labour does not mean all child work.

Under Australian law, modern slavery is defined in the Act, in the event of any inconsistency, the definitions in the Act take precedence over this policy.

4 EXAMPLES OF MODERN SLAVERY

Modern slavery can occur in many forms, however some of the common forms which can occur in office based-work include (but are not limited to) the following:

FORCED LABOUR

In addition to general [warning signs](#) of modern slavery, there are other signs that someone might be experiencing forced labour.

Someone experiencing forced labour may:

- Be forced to work
- Work in unskilled manual labour for little or no pay
- Have to pay for tools, food, or accommodation or have these costs deducted from their wages.
- Face security measures to keep them on the work premises

DEBT BONDAGE

Debt bondage is when someone is forced to work to repay an excessive debt.

An employer or recruiter may tell someone the debt is to pay back:

- Recruitment fees
- Travel costs for getting them to Australia
- Visa sponsorship
- Accommodation, food and other costs.

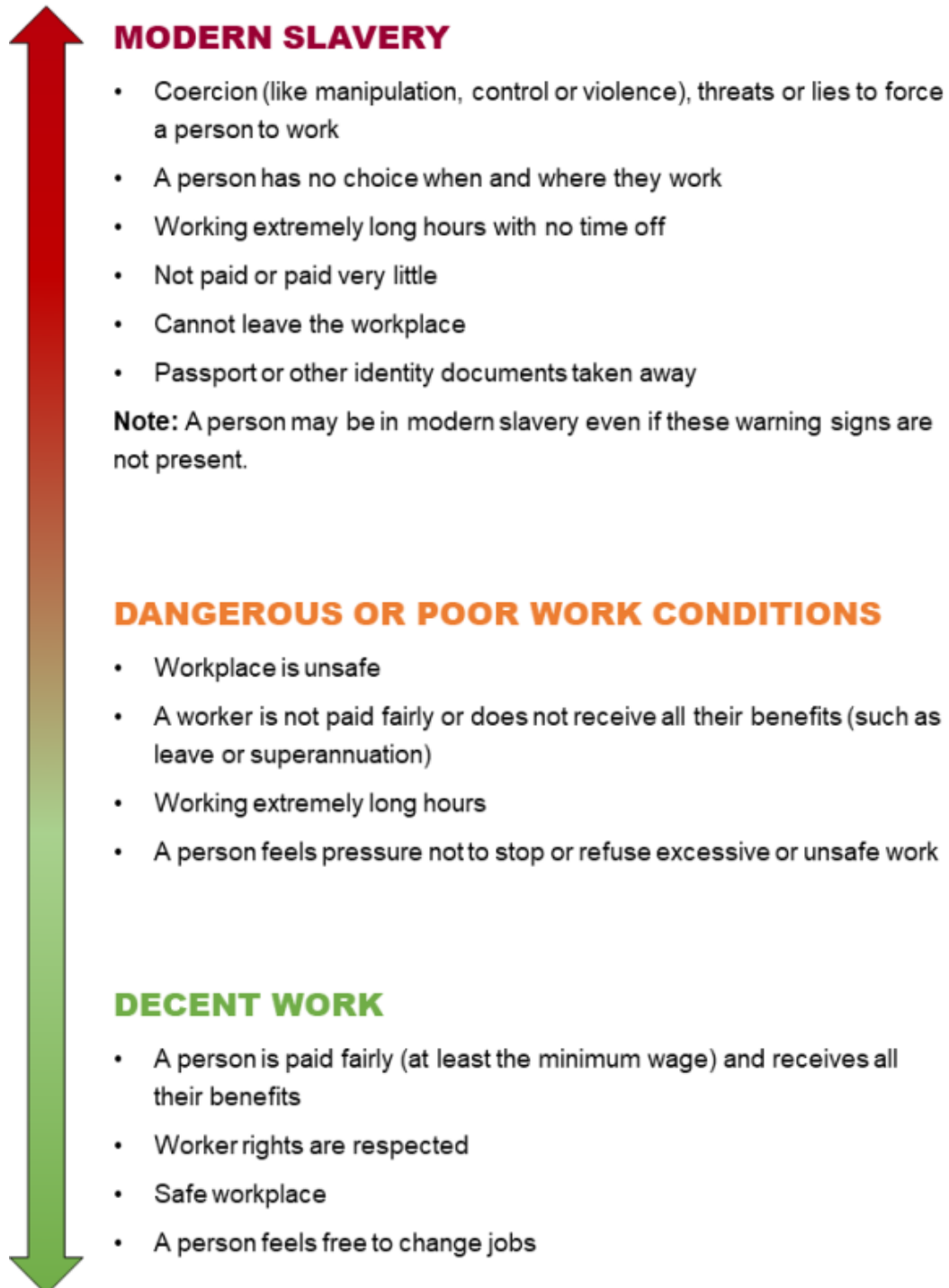
It is illegal in Australia for an employer or recruiter to request payment for visa sponsorship or a visa.

It is also illegal for an employer or recruiter to demand payment in return for a job (whether short-term or permanent in nature).

An employer or sponsor cannot cancel your visa, even if you have not followed your visa conditions. Only the Australian Government Department of Home Affairs can cancel a visa.

If your employer treats you poorly and you report it to the Fair Work Ombudsman, your visa will not automatically be cancelled, even if your employer sponsored you to come to Australia.

Modern Slavery includes the **most serious forms** of worker exploitation:





5 RISK MANAGEMENT AND DUE DILIGENCE

RISK ASSESSMENT

We recognise that modern slavery risks may exist in various areas, particularly:

- Hardware and electronic component suppliers, especially in regions with weak labour protections.
- Third-party IT service providers, including data centres and offshore development firms.
- Contract and gig-economy workers may be subject to exploitation.

We will conduct periodic assessments to identify and prioritise areas of heightened risk.

SUPPLY CHAIN DUE DILIGENCE

PSION implements the following due diligence measures:

- Incorporating anti-modern slavery clauses in all contracts with suppliers and partners.
- Requiring suppliers to provide evidence of their modern slavery and human rights policies.
- Issuing questionnaires and conducting audits to assess supplier practices and compliance.
- Prioritising ethical sourcing, giving preference to suppliers with demonstrated human rights due diligence and certification.

6 ROLES AND RESPONSIBILITIES

EXECUTIVE MANAGEMENT

- Provide strategic oversight and approve this policy.
- Review and endorse annual reports related to modern slavery compliance.

PROCUREMENT AND CONTRACTING TEAMS

- Conduct supplier due diligence.
- Ensure all supplier contracts include appropriate modern slavery clauses.
- Monitor supplier compliance and escalate issues where necessary.



TEAM & CULTURE (HR) DEPARTMENT

- Monitor internal employment practices to ensure compliance.
- Provide training and guidance to staff on modern slavery risks.
- Ensure fair recruitment, onboarding, and employment standards.

ALL PSION STAFF

- Are expected to familiarise themselves with this policy.
- Must report any suspected breaches or concerns regarding modern slavery through approved channels.

7 TRAINING AND AWARENESS

EMPLOYEE TRAINING

- All employees will receive basic awareness training on modern slavery as part of induction.
- Tailored training will be provided for high-risk roles, including:
- Procurement training on risk identification and supplier due diligence.
- HR provisioned training on ethical recruitment and labour rights.

SUPPLIER COMMUNICATION

- All suppliers and third-party partners will be made aware of PSION's expectations and provided with this policy.
- We will communicate our standards clearly and support our partners in meeting them.

8 GOVERNANCE AND REPORTING

MONITORING AND REPORTING

PSION will monitor the effectiveness of this policy through:

- Internal audits
- Supplier reviews
- Feedback from employees and stakeholders
- An annual report will be prepared to summarise key activities, findings, and actions taken.



GRIEVANCE MECHANISMS

PSION will provide a confidential and accessible reporting channel for:

- Employees
- Contractors
- External stakeholders

Reports can be made anonymously, and no retaliatory action will be taken against whistleblowers.

9 REMEDIATION

Where instances of non-compliance are identified, PSION will:

- Work with the party to implement a corrective action plan.
- If necessary, terminate contracts or relationships where remediation is not possible or effective.

10 PERIODIC REVIEW

This policy will be reviewed at least once annually or more frequently if needed.

Updates will reflect changes in legislation, industry best practice, or internal policy improvements.

11 CONTACT AND FURTHER INFORMATION

For questions or to report concerns related to this policy, please contact:

PSION Ethics & Compliance Officer

Email: ethics.compliance@psion.com.au

PSION Team & Culture (HR)

Email: team.culture@psion.com.au