

**Innovating with Precision**

**Solving Metal Problems**

**Building a Circular Future**

## 1. Policy Statement (Summary)

Jenner Engineering Mackay has **zero tolerance** for modern slavery, forced labour, bonded labour, human trafficking, or child labour.

We are committed to:

- Complying with the **Australian Modern Slavery Act 2018**.
- Embedding risk controls into our **ISO 9001 Quality Management System**.
- Promoting transparency, accountability, and ethical supply chains.

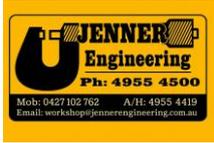
This policy applies to all employees, contractors, suppliers, and business partners.

**Signed:**

**Colin Norris** - Managing Director & Head of Operations

**Carol-Anne Norris** - Director of Growth & Compliance

**Date:** January 2025



## **2. Modern Slavery Policy (Detailed)**

### **2.1 Commitment**

We recognise that modern slavery can occur in complex supply chains. Jenner Engineering Mackay actively identifies, manages, and reduces risks across operations and suppliers.

### **2.2 Scope**

This system applies to:

- All Jenner Engineering Mackay employees, contractors, and directors.
- All suppliers, subcontractors, and business partners.

### **2.3 Standards**

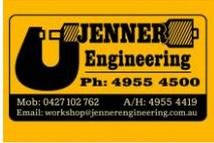
Aligned with:

- **ISO 9001: Quality Management Systems**
- **ISO 26000: Social Responsibility**
- **ISO 20400: Sustainable Procurement**
- **ISO 37001: Anti-Bribery**
- **ISO 45001: Occupational Health & Safety**

### **2.4 Supplier Expectations**

Suppliers must:

- Prohibit modern slavery, forced and child labour.
- Provide fair wages and safe conditions.
- Apply ethical recruitment practices.
- Cascade standards through their supply chain.
- Cooperate with due diligence requests.



## 2.5 Reporting Concerns

- Concerns may be reported to either Director confidentially.
- Anonymous reporting is allowed.
- Whistleblowers are protected.
- All reports will be investigated and documented.

## 2.6 Continuous Improvement

- Risks reviewed annually.
- Policy updated as needed.
- Controls scaled as business grows.

## 3. Management Procedure (Internal)

### 3.1 Purpose

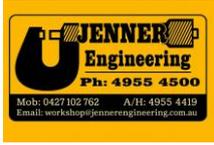
To provide practical controls to prevent modern slavery, integrated with ISO 9001.

### 3.2 Responsibilities

- **Managing Director & Head of Operations**
  - Implements controls in daily operations.
  - Ensures supplier checks are completed.
  - Oversees recruitment and contractor onboarding.
- **Director of Growth & Compliance**
  - Reviews and approves policy annually.
  - Manages modern slavery reporting obligations.
  - Ensures training delivery and record keeping.
  - Leads stakeholder engagement and continuous improvement.
- **Employees & Contractors**
  - Complete training.
  - Report concerns confidentially.

### 3.3 Supplier Risk Management

- **Low Risk (local suppliers):** ABN check + sign Code of Conduct.
- **Medium Risk (national/subcontractors):** Questionnaire + contract clause.
- **High Risk (overseas/high-risk industries):** Provide evidence (audits, certifications).

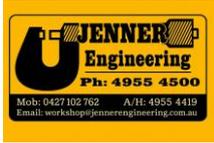


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All results recorded in Supplier Register.



### **3.4 Training & Awareness**

- 15-minute induction for new staff.
- Annual refresher (toolbox talk).
- Role-specific training for procurement/HR functions.
- Records stored in HR files.

### **3.5 Reporting & Grievance**

- Reports made to either Director (verbal or written).
- Anonymous reporting permitted.
- All cases logged and investigated.

### **3.6 Remediation**

- Protect affected individuals.
- Escalate to authorities if required.
- Engage external support services.
- Corrective actions logged in QMS.

### **3.7 Monitoring & KPIs**

- % suppliers checked (target: 100%).
- % staff trained (target: 100%).
- Reports raised/resolved.

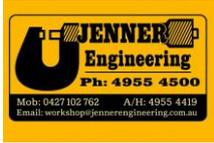
Reviewed annually by both Directors.

### **3.8 Audit Checklist**

- Is the policy signed and current?
- Supplier checks recorded?
- Staff trained within last 12 months?
- Any reports resolved?
- Reviewed in management review?

### **3.9 Continuous Improvement**

- Risks reviewed annually.
- Controls updated with growth and legislation.



#### 4. Supplier Code of Conduct

Suppliers must:

- Comply with all applicable laws, including the Modern Slavery Act.
- Prohibit modern slavery, forced and child labour.
- Provide safe working conditions and fair pay.
- Conduct business ethically and transparently.
- Apply standards to subcontractors.
- Report concerns to Jenner Engineering Mackay.

#### Supplier Acknowledgement

I confirm compliance with Jenner Engineering Mackay's Supplier Code of Conduct.

Supplier Name: \_\_\_\_\_

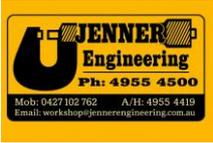
Authorised Representative: \_\_\_\_\_

Signature: \_\_\_\_\_

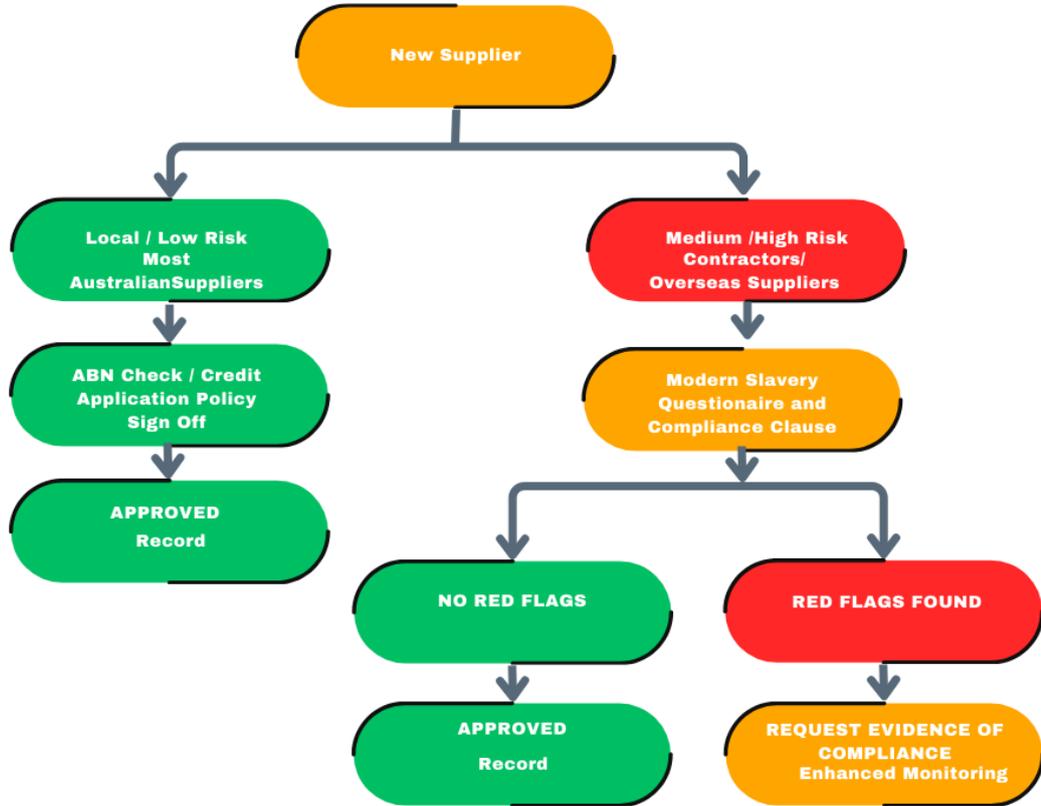
Date: \_\_\_\_\_

#### 5. Supplier Risk Matrix

Risk Factor	Low	Medium	High
Geography	Australia/NZ	Regional APAC	High-risk regions
Industry	Local machining	Manufacturing	Textiles/Mining inputs
Transparency	Open records	Limited disclosure	No disclosure
Labour	Direct hires	Some subcontracting	Heavy subcontracting
History	None	Minor issues	Known breaches



### 6. Supplier Risk Flowchart



### 7. Leadership Endorsement

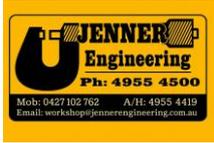
This system is approved and supported by Jenner Engineering Mackay's Directors.

Signed:

Colin Norris - Managing Director & Head of Operations

Carol-Anne Norris - Director of Growth & Compliance

Date: January 2025



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## Document 2 – Modern Slavery Policy Statement (Handout Version, Updated)

### Jenner Engineering Mackay

#### Modern Slavery Policy Statement

Document Ref: JEM-MLP-01 | Version: 1.0 | Issue Date: January 2025

Jenner Engineering Mackay has **zero tolerance** for modern slavery, forced labour, bonded labour, human trafficking, or child labour.

We are committed to:

### 1. Compliance with the Modern Slavery Act

How:

- The **Director of Growth & Compliance** monitors laws and updates this policy annually.
- The **Managing Director & Head of Operations** ensures supplier contracts and practices comply.

### 2. Embedding controls into our ISO 9001 QMS

How:

- The **Managing Director & Head of Operations** ensures supplier onboarding includes checks (ABN, questionnaires, or evidence).
- The **Director of Growth & Compliance** reviews risks during management reviews.

### 3. Ethical and sustainable practices in operations and supply chains

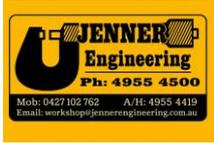
How:

- All suppliers must sign our **Supplier Code of Conduct**.
- Supplier risks assessed by both Directors using a low/medium/high approach.
- Support provided to suppliers instead of unnecessary barriers.

### 4. Transparency, accountability, and continual improvement

How:

- The **Director of Growth & Compliance** ensures all staff receive training.
- The **Managing Director & Head of Operations** oversees the confidential reporting channel.
- Both Directors review effectiveness annually and document improvements.



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This policy applies to all employees, contractors, suppliers, and business partners.

Concerns may be reported confidentially to either Director. Whistleblowers are protected, and all reports will be investigated promptly and fairly.

**Signed:**

**Colin Norris** - Managing Director & Head of Operations

**Carol-Anne Norris** - Director of Growth & Compliance

**Date:** January 2025