

Modern Slavery and Ethical Conduct Policy

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Purpose

Pandanus Workforce is committed to operating ethically, responsibly, and in full compliance with the **Modern Slavery Act 2018 (Cth)**. This policy outlines our commitment to preventing all forms of modern slavery, forced labour, human trafficking, and exploitation within our operations and supply chain.

It supports our broader mission of *“Empowering Humanity to Achieve Greatness”* and reflects our belief that every individual deserves to work freely, safely, and with dignity.

Scope

This policy applies to:

- All Pandanus Workforce employees, contractors, and temporary workers.
- All suppliers, subcontractors, and business partners engaged in the delivery of our services.
- All operations nationally, including renewable energy, civil construction, and infrastructure projects.

Policy Statement

Pandanus Workforce maintains a **zero-tolerance approach** to modern slavery in any form. We are committed to:

- Ensuring all work is freely chosen and free from coercion.
- Upholding fair, lawful, and transparent employment practices.
- Partnering only with suppliers and subcontractors who share our commitment to ethical and legal compliance.
- Continuously monitoring and improving our practices to identify, assess, and mitigate risks of modern slavery.

Employment Practices

Pandanus Workforce directly employs and engages its workforce under **lawful employment contracts** that comply with the **Fair Work Act 2009**, **National Employment Standards (NES)**, and relevant **Modern Awards**.

Our employment practices include:

- **Right-to-Work Verification:** All workers undergo identity and visa checks through our compliance partner **WorkPro** to confirm legal entitlement to work in Australia.
- **Transparent Pay and Conditions:** Employees receive full payment for all hours worked, inclusive of superannuation, overtime, and allowances. No unlawful deductions or bond arrangements are permitted.
- **Freedom of Movement and Association:** Employees have the right to leave employment, join unions, and express workplace concerns freely.
- **Health, Safety, and Wellbeing:** Every worker has access to a safe workplace and fair conditions in line with our ISO 45001-aligned Health & Safety Management System.

Supply Chain and Contractor Expectations

Pandanus Workforce requires all suppliers, subcontractors, and labour partners to uphold the same ethical and legal standards. Our **Supplier Code of Conduct** forms part of all procurement and subcontractor agreements and requires:

- Compliance with all workplace laws and regulations.
- No use of forced, bonded, or child labour.
- Transparent employment practices with freely chosen work.
- Fair remuneration, safe working conditions, and respect for human rights.

Suppliers are subject to pre-engagement vetting, ongoing monitoring, and may be reviewed or audited where potential risks are identified.

Risk Identification and Mitigation

We proactively assess and manage risks through:

- **Due diligence** during supplier onboarding and renewal.
- **Modern slavery risk assessments** across high-risk categories such as subcontracted labour, cleaning, PPE, and imported goods.
- **Internal training and awareness** for managers and employees on ethical sourcing and modern slavery risk.
- **Contractual obligations** requiring adherence to Pandanus Workforce's ethical standards.

Reporting and Accountability

Any employee, supplier, or stakeholder who suspects a breach of this policy is encouraged to report it confidentially to management or through our **Whistleblower and Grievance Reporting Procedure**.

Pandanus Workforce commits to:

- Investigating all reports promptly and confidentially.
- Taking corrective action where non-compliance is identified.
- Cooperating fully with authorities if required.

Retaliation or adverse treatment against any person reporting a concern in good faith will not be tolerated.

Continuous Improvement and Review

This policy is reviewed annually or as required by legislative or operational changes. Our findings, actions, and commitments to addressing modern slavery risks are disclosed in our **Modern Slavery Statement**, submitted in line with Commonwealth reporting requirements.

Responsibilities

- **Managing Director:** Ultimate accountability for policy compliance and modern slavery reporting.
- **Operations and Procurement Teams:** Implementation of due diligence, supplier engagement, and ongoing compliance checks.
- **All Employees:** Responsible for adhering to this policy and reporting any concerns or suspected breaches.

Policy Endorsement

Pandanus Workforce believes ethical practice is fundamental to sustainable business. By maintaining transparency, accountability, and respect for human rights, we protect our people, our clients, and the communities in which we work.