



## **PROPHECY INTERNATIONAL HOLDINGS LIMITED**

### **MODERN SLAVERY POLICY**

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## INTRODUCTION

Modern Slavery is a crime and violation of human rights and is defined under the Australian Modern Slavery Act 2018 (the Act). <https://legislation.gov.au/details/C2018A00153>

The Modern Slavery Reporting Requirement applies to large businesses and other entities in the Australian market with annual consolidated revenue of at least A\$100 million. The Reporting Requirement supports the Australian business community to identify and address their modern slavery risks and maintain responsible and transparent supply chains.

Prophecy International does not meet the annual revenue requirements, so it is not mandated to prepare an annual Modern Slavery Statement. However, as an organisation we understand the significant importance of Modern Slavery and we have prepared this Policy to ensure its commitment to supporting and eliminating modern slavery.

## POLICY STATEMENT

Prophecy International has a zero-tolerance approach to Modern Slavery. The company is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in its own business operations or its supply chains.

The Company is also committed to ensuring there is transparency in its approach to tackling Modern Slavery throughout its business operations. The prevention, detection and reporting of Modern Slavery in any part of the business is the responsibility of all those working for it or under its control.

Employees which also include contractors, are encouraged to raise concerns with their manager, the CISO or the Global Director of Human Resources, about any likely Modern Slavery breaches in any parts of the company's supply chains or business, at the earliest possible stage. Prophecy International expects the same high standards from all of its contractors, suppliers and other business partners. We also expect suppliers to hold their own suppliers to the same high standards.

## WHAT IS THE PURPOSE OF THIS POLICY?

The purpose and intent of this policy is to limit risks of modern slavery practices in our business and supply chain.

This policy supports our commitment and underpins our position and intent on modern slavery.

## WHO DOES THIS POLICY APPLY TO?

This policy applies to you if you are involved in our business, including if you are an employee, director, officer, labour hire staff, contractor, or other representative of our business or of any business in our supply chain.

While this policy is not part of any contract you may have with us, you are expected to comply with it. If you do not comply with this policy, we may end our business relationship with you and if you are an employee, you may be disciplined or dismissed.



# PROPHECY

## WHAT IS MODERN SLAVERY?

Modern slavery is depriving a person of freedom for commercial gain and in violation of fundamental human rights.

It describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery involves serious exploitation, sub-standard working conditions or the underpayment of workers.

Modern slavery can take many forms including:

- (a) **trafficking in persons**, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery, or practices similar to slavery, servitude or the removal of organs;
- (b) **slavery**, which is where the offender exercises powers of ownership over the victim;
- (c) **servitude** which is where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work;
- (d) **forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work;
- (e) **forced marriage**, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
- (f) **debt bondage**, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
- (g) **the worst forms of child labour**, which involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
- (h) **deceptive recruiting for labour or services** which is where the victim is deceived about whether they will be exploited through a type of modern slavery.

It can also extend to:

- (a) entering a commercial transaction involving a slave;
- (b) exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading;
- (c) conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it).

**Modern slavery can be complex and multi-faceted and can be difficult to spot.**

## WHAT ARE SOME OF THE INDICATORS OF MODERN SLAVERY PRACTICES?

Modern slavery indicators may include where a person:

- (a) is not in possession of their own passport, ID or travel documents;
- (b) is acting as though they are being instructed or coached by someone else;



- (c) allows others to speak for them when spoken to directly;
- (d) is dropped off and collected from work;
- (e) is withdrawn or appears frightened or have physical indicators of slavery, such as injuries;
- (f) unable to contact friends or family freely;
- (g) has limited social interaction or contact with people outside their immediate environment;
- (h) story contains obvious errors;
- (i) acts with hostility or have difficulty in concentrating due to trauma;
- (j) has few possessions;
- (k) has little or no control over their finances or no access to a bank account, or they are being significantly overcharged for their accommodation; and
- (l) is living in a very poorly maintained and overcrowded place.

These indicators are not exhaustive and do not necessarily mean they are modern slavery practices. Sometimes there may be other reasons or circumstances that indicate that something is not right.

### **WHY DO WE WANT TO LIMIT RISKS OF MODERN SLAVERY?**

Limiting modern slavery practices makes good business sense, protecting our workers and our reputation.

It also supports us in assessing and addressing modern slavery risks as required by Modern Slavery Legislation.

### **WHAT ARE OUR RESPONSIBILITIES?**

We will endeavour to:

- (a) prepare a modern slavery policy as required by Australian Law;
- (b) comply with the Modern Slavery Act 2018;
- (c) identify and address modern slavery risks in our business;
- (d) commit to enhancing our existing policies to include Modern Slavery;
- (e) have adequate safeguards in place;
- (f) include Modern Slavery in high level assessment of risks;



- (g) Ensure Employees are free to choose to work for their employer and to leave the company upon reasonable notice;
- (h) Ensure that all employees are provided with a clear contract of employment, which complies with local legislation;
- (i) Ensure that all employees are treated in a fair and equal manner and with dignity and respect;
- (j) Ensure that any form of discrimination, victimisation, or harassment on any prescribed grounds under commonwealth, state or territory laws will be prohibited. This includes marital status, pregnancy, family responsibilities, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, religious belief, age, union activity or any other prescribed ground;
- (k) Ensure that all applicable laws and industry standards on employee wages, benefits, working hours and minimum age is adhered to in all countries of operation, without any unauthorised deductions;
- (l) Ensure that all slavery and human trafficking laws are complied with including, but not limited to, the provisions of the Act and any applicable state legislation;
- (m) Encourage Suppliers to ensure their business operations are free from slavery and human trafficking practices whether in Australia or elsewhere, both internally and within their supply chains and other external business relationships;
- (n) provide training via Security Awareness CBT tool to relevant employees on policies and their responsibilities;
- (o) take steps to raise your awareness of modern slavery risks, including by having this policy;
- (p) Verifying the identity of each of our workers and their right to work before employment commences;
- (q) Use our best endeavours to procure from our suppliers by contract and that have a Modern Slavery Policy in place; and
- (r) Human Resource – We are committed to ensuring the health, safety and wellbeing of our workforce, and we maintain a suite of policies that are informed by and compliant with Australian workplace and occupational health and safety law. All employees will be engaged on Employment Contracts and Offer Letters that comply with all relevant laws.

## **WHAT ARE YOUR RESPONSIBILITIES?**

You must take all reasonable steps to ensure our business and supply chain is free of modern slavery practices.



# PROPHETCY

However senior you are and regardless of your business or working relationship with us, you must pay close attention to the high-risk areas identified in our Modern Slavery Statement.

Examples of specific responsibilities include:

- (a) participating in any training, including in this policy;
- (b) leading by example by making appropriate background checks on all employees, recruitment agencies, contractors, etc to ensure we know who is working for us;
- (c) remaining alert to indicators of slavery (see above);
- (d) using only approved contracts which include modern slavery clauses; and
- (e) obeying our instructions regarding modern slavery.

Turning a blind eye is unacceptable and if you reasonably suspect there may be modern slavery, report it under this policy.

## HOW DO I REPORT SLAVERY CONCERNS?

If you have a reasonably held suspicion of modern slavery practices, discuss your concerns with the Global Director of Human Resources ([slaycock@prophecyinternational.com](mailto:slaycock@prophecyinternational.com)) or Chief Information Security Officer ([schallans@prophecyinternational.com](mailto:schallans@prophecyinternational.com)) who will decide a course of action and provide any further advice.

The often-hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. It is important to respond in a way that is safe, ethical and respects the dignity and rights of the person at risk or affected by modern slavery practices.

**Important:** Not all victims may want to be helped and sometimes, reporting a suspected trafficking case puts the potential victim at risk, so it is important that unless there is immediate danger, you discuss your concerns with the Global Director of Human Resources or CISO before taking any further action.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 237 to discuss or report a suspected case. Contact can be made anonymously.

In an emergency and if someone is in immediate danger, please call Triple Zero (000) for police assistance.

Don't tackle a situation on your own as dangerous criminals can be behind modern slavery and human trafficking.

Keep your eyes and ears open—your awareness and actions may stop someone from being exploited or abused.

## PROPHETCY REPORTING REQUIREMENTS

As Prophecy International is not classified as a mandated reporting entity under the Modern Slavery Act 2018, no formal reporting is required under this policy or legislation.

Prophecy International is not required to provide a Modern Slavery Statement to the Attorney General's Department. Only mandated organisations as described by the Modern Slavery Act (2018) need to submit a Modern Slavery Statement for publication on an on-line public register at:

(<https://modernslaveryregister.gov.au>).



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## POLICY COMMUNICATION

This policy has been published on the Company website. It is also reviewed at least annually by the Executive Management Team and the Board Audit and Risk Committee to ensure its effectiveness, continued application and relevance.

## Document History

Version	Date	Approved By	
1.0	Aug 2023	Board	Policy adopted
1.1	Aug 2025	Board	Annual review – no changes required.