

# EPTEC GROUP MODERN SLAVERY POLICY

POL-024

## **INTRODUCTION**

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery. These practices may also escalate into modern slavery if not addressed.

## **DEFINITION**

The Commonwealth Modern Slavery Act 2018 (the Act) defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour mean situations where children are subjected to slavery or similar practices or engaged in hazardous work.

#### LEARN MORE: WHERE DOES MODERN SLAVERY FIT?

Modern slavery happens at the most extreme end of a spectrum that ranges from decent work to serious criminal exploitation.



## **MODERN SLAVERY**

Worker cannot refuse or cease work because of coercion, treats or deception. Worker may also be deprived of personal freedom.

## **DANGEROUS OR SUBSTANDARD WORKING CONDITIONS**

Worker can refuse or cease work but doing so may lead to detriment.

Worker is not paid fairly and does not receive some or all entitlements.

Worker may be required to work excessive hours.

Workplace is unsafe.

#### **DECENT WORK**

Workers' rights respected.

Worker free to refuse or cease work.

Worker paid fairly (at least minimum wage.)

The workplace is safe.

https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf

## **COMPLIANCE GUIDE**

Not applicable

## **PURPOSE**

Australia is not immune from modern slavery. The Australian Government (the Government) estimates there were 1,567 modern slavery victims in Australia between 2015 and 2017. Freedom from slavery is a fundamental human right. Under the UN Guiding Principles on Business and Human Rights (UN Guiding Principles) entities have a responsibility to respect human rights in their operations and supply chains. This responsibility includes taking action to prevent, mitigate and, where appropriate, remedy modern slavery in an entity's operations and supply chains.

Eptec has reviewed the 'Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities'. Eptec does not



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currently meet the criteria for reporting, however has elected voluntarily to assess the criteria to ensure compliance and to participate in the initiatives to prevent slavery.

#### **STRUCTURE**

Eptec is comprised of the Group Companies registered with both ABN and ACN listed in Section 7.0. Typically, Eptec's solutions use the latest resin technology, cement grouts, epoxy grouts, waterproof membranes, high-tech reinforcement such as carbon fibre and many other innovative and specialised products. Eptec does not manufacture products – it is purely an installer/applicator and is totally independent of any material suppliers. We will however often participate with manufacturers in the development and application of new products, always with a vision for improving industry techniques. Our specialised services are applicable across a broad spectrum of industries including Defence, Water & Wastewater, Infrastructure and Energy & Resources.

### **OPERATIONS**

Eptec operates wholly within Australia and directly employs all workers. These persons are engaged either as white collar/staff undertaking administrative, operational and management activities or; as blue collar/trade personnel undertaking remedial, asset preservation and painting/blasting work. All work locations are within Australia.

## **SUPPLY CHAINS**

Eptec sources labour from Australian markets and where there is a deficiency will bring limited labour from overseas. These persons are employed to work in Australia under suitable Visas and are paid at the same rate as the Australian resident workers and/or under our Enterprise Agreements. Eptec utilises the services of a Migration Agent and Recruitment Agents to ensure all local and international standards of ethical sourcing and compliance are met. Products and services are fully sourced in Australia with the preference being to utilise Australian-owned companies, however, a proportion of these suppliers are international Companies.

## **EPTEC GROUP COMPANY STRUCTURE**

Eptec is comprised of the following Group Companies:

Eptec Holdco Pty Ltd ABN: 14 638 785 387, ACN 638 785 387

Eptec Bidco Pty Ltd ABN: 12 638 785 378, ACN 638 785 378

Eptec MBO Co P/L ABN: 43 623 497 923, ACN 623 497 923

Eptec Holdings P/L ABN: 33 623 502 652, ACN 623 502 652

Eptec P/L ABN: 48 080 052 259, ACN 080 052 259

Eptec Services P/L ABN: 30 082 596 432, ACN 082 596 432

Eptec Marine P/L ABN: 49 118 319 547, ACN 118 319 547

Eptec Victoria P/L ABN: 37 081 384 250, ACN 081 384 250

Manikam Reddy Acting CEO