

MODERN SLAVERY POLICY STATEMENT

In accordance with the Modern Slavery Act 2018, this policy statement outlines the steps that Marsh Alliance has taken, and is continuing to take, to assess and reduce risks of modern slavery within our business and our supply chain, and also our plans for review and improvement.



INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes many forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We recognise we have a responsibility to take a strong approach to reject any forms of modern slavery and human trafficking.

About Us

Marsh Alliance has been Australia's largest spring manufacturer for a number of years and has expanded to offer a wide range of other products. Many of our over 100 employees are long serving team members, some with up to 40 years of service making springs with us! That deep manufacturing knowledge is backed up by state-of-the-art CNC equipment complementing old school methods. We supply custom made products to a range of industries and thousands of customers each year.

STATEMENT

We are committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both in our own business and our supply chain.

Marsh Alliance is committed to limiting the risk of modern slavery occurring in our business by ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chain. We expect our employees and our suppliers to share our commitment to help ensure modern slavery does not occur.

At present (2022) we have a policy statement, basic process and a person in place helping oversee this important issue due to the size and limited resources within our company. However, we understand the importance of this issue and are making plans to turn these rudimentary processes into more robust processes in future.

Initial reviews of our company and primary suppliers indicate compliance to the best of our knowledge and we thank you for your patience as we continue to build and implement these more robust processes moving forward.

We Explicitly Prohibit

- All forms of modern slavery such as forced labor, human trafficking and child labour
- Using recruiters that do not comply with local labor laws of the country
- Charging workers or potential workers recruitment fees
- Withholding worker identity or immigration documents
- Procuring commercial sex acts

We will ensure to the best of our ability

- All employee wages meet applicable host country legal requirements in accordance with local law or governing award requirements.
- All Employees, including those hired by recruiters, are given detailed and accurate work agreements in a language understood by the worker.

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- Document checks (including Proof of Age documents and Right to Work documents) of all employees will be sighted before they begin working to confirm they are allowed to work according to legal standards.
- All employees have the ability to cancel their work contracts at any time with no financial penalty, subject to giving reasonable notice, in accordance with local laws or award requirements.
- Engagement of foreign and or domestic migrant workers will be monitored. If foreign migrant workers are ever engaged for employment and brought to our host country, in addition to approved local pay rates and conditions, they will be provided:
 - *Provision of return transportation to their country of origin, upon the request of the employee at the end of the employment contract.
 - *Initial housing arranged in the host country will meet housing and safety standards.
- Encouragement of supplier compliance with international standards governing Modern Slavery.
- Formal screening and evaluation of prospective recruitment companies to determine if they (i) operate in compliance with the law and applicable organization policies, and (ii) observe the "employers pay" principle of not charging any recruitment fees to workers.
- Prioritize the use of ethical recruitment agencies certified by a credible authority.
- Engage in due diligence activities to identify, prevent and mitigate risks specific to slavery and human trafficking in the areas of; our operations, our supply chain, and our labor supply chain. These are still being implemented.
- We will ensure employees in the functional areas of Supply chain management and Recruitment receive training on how to mitigate risk of slavery and human trafficking.
- We will encourage workers and agents to report, without fear of retaliation, matters related to slavery and human trafficking.
- We will maintain internal tracking and procedures to respond to any failure of workers or agents to meet organization policies regarding slavery and human trafficking.

Overview of Our Supply Chain

We procure goods and services needed for our business's day-to-day operations from many preferred suppliers with our main supply chain arrangements coming from the metal wire manufacturing industry.

IDENTIFYING RISKS OF MODERN SLAVERY

Our Operations

We believe there is no risk of modern slavery in our directly employed workforce, as the labour market in Australia is well regulated. Regulations apply to the manufacturing sector and the presence of The Manufacturing and Associated Industries and Occupations Award 2020 governs our Australian employment conditions and contracts in conjunction with the Australian National Employment Standards and The Fair Work Act 2009 legislation. In addition to this, our policies and communications enable employees, and suppliers, to disclose any potential issues in our business and supply chain for investigation.

Review of Our Supply Chain

Marsh Alliance undertakes risk assessments of our key suppliers of goods and services. Our review of suppliers focused on the type of goods and services delivered (i.e. wire products)

A substantial number of our supplier's operations are based in Australia. We believe these suppliers have a lower risk of modern slavery occurring in their supply chains, as their operations are Australian based, therefore they are likely required to comply with the Modern Slavery Act within their own supply chains.

However, our procurement activities do include occasional purchases of goods and services from international suppliers who provide potentially higher risk products, such as wire products.

We have listed our key suppliers and service providers enabling us to undertake a risk assessment of any modern slavery risks, or potential risks, within our supplier's operations and

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supply chains.

We identified a small number of suppliers who are either located overseas or source their goods from manufacturing plants overseas.

These suppliers are requested to complete a Modern Slavery Supplier Questionnaire.

The results of the Modern Slavery Supplier Questionnaire did not indicate the need for any further actions at this time, however they will remain listed and reassessed annually.

Our Framework

Marsh Alliance is implementing further governance framework and as part of our commitment to informing our employees and suppliers in modern slavery risks, we undertook a review of our supplier agreements and procurement processes to ensure that we have sound processes in place to meet compliance.

In summary our review included the following activities:

- Publication of our Modern Slavery Statement Policy
- Updating our documents to include the Modern Slavery Supplier Questionnaire to ensure we identify any modern slavery risks early with suppliers during the procurement process
- Review of our procurement procedures to ensure inclusion of modern slavery checks; and
- Review of supplier agreements to understand contractual obligations addressing modern slavery compliance

Raising Awareness

Marsh Alliance aims to raise awareness and strengthen our understanding of the risk of modern slavery within our business and our supply chain by:

Employees: Will receive online learning to provide information on modern Slavery and training on their role in eliminating modern slavery.

Suppliers: Will receive Modern Slavery Supplier Questionnaire for completion and assessment.

FUTURE DEVELOPMENTS

Over time we will continue to revise and develop our approach to modern slavery compliance aiming to build further capacity and a more robust framework within our business to monitor and act on modern slavery risks.

Marsh Alliance will continue to review policies and procedures to ensure:

- We have adequate processes in place to meet modern slavery compliance
- Inclusion of modern slavery clauses to increase awareness across our business and supply chain.

APPROVAL

This statement has been approved by Marsh Alliance's General Manager.

Signed: 

Date: 13/06/2022