



TOURISM &  
LEISURE LTD

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# Modern slavery policy

Apollo Tourism & Leisure Ltd ACN 614 714 742 (Apollo or **Company**)

**Effective Date:** July 2020 (Reviewed July 2021)

## Modern slavery policy

### 1 Introduction

The Company is committed to limiting the risk of modern slavery within its own business, within its supply chains or through any other business relationship.

Modern slavery is defined by the *Modern Slavery Act (Cth) 2018* (the **Act**) to include the following types of serious exploitation:

- **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;
- **slavery:** which is where the offender exercises powers of ownership over the victim;
- **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;
- **forced labour:** which is where the victim is either not free to stop working or not free to leave their place of work;
- **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;
- **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;
- **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
- **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.

Modern slavery can also extend to:

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

## 2 Purpose

The Act took effect on 1 January 2019 and requires the Company to make annual reports (**Modern Slavery Statements**) on the actions of its divisions to address modern slavery risk.

The purpose of this Modern slavery policy (**Policy**) is to ensure that the Apollo group of companies:

- is compliant with the Act and other applicable local and national laws and regulations in the areas in which the businesses operate;
- sources products and services in accordance with legal obligations and community expectations while working with suppliers to improve their social practices; and
- acts to prevent, mitigate where appropriate, remedy modern slavery in their operations and supply chains.

The Company is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery and human trafficking throughout its supply chains, consistent with its disclosure obligations under the Act.

In addition to the above, the Company provides safe and fair working conditions for all its employees and ensures that no child labour is employed, in line with minimum age laws, within the countries that it operates. The Company expects the same standards from all of its contractors, suppliers and other business partners and as part of its contracting processes.

## 3 Policy Application

This Policy applies to all persons working for or on behalf of, or providing services to, the Company in any capacity, including all suppliers, employees, directors, officers, agency workers, contractors, consultants and any other third-party representatives who deal with the Company.

The Company expects that all who have, or seek, a relationship with the Company to familiarise themselves with this Policy and to act in a way that is consistent with its values.

The Company will proactively work to reduce modern slavery in two key ways:

- in the preparation and submission of the Company's annual Modern Slavery Statement in accordance with the requirements of the Act; and
- in adopting a risk management approach, both internally and with our suppliers to identify high risk areas where modern slavery could be present, encourage reporting of modern slavery risks, and evaluating and monitoring these risks.

## 4 Policy

All employment with the Company is voluntary.

The Company does not use or condone, child or forced labour in any of its operations or premises and works to ensure these practices are not present in its workforce or supply chain.

The Company does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude.

The Company abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.

Where the Company is made aware of modern slavery practices in its own business or within its supply chain, the Company will investigate all claims and if valid, resolve the issue in line with the values expressed in this Policy.

The Company conducts risk assessments to determine which parts of the business and supply chains are most at risk from modern slavery to ensure focus on those areas.

This Policy will be used to underpin and inform any statement on modern slavery that the Company is required to produce as a result of legislative requirements in any country in which the Company operates.

## **5 Reporting**

Internal reporting is critical to the Company's success and it is both expected and valued. Any suspected violations of this Policy or any illegal or unethical behaviour should be promptly reported. Complaints will be kept confidential and will be dealt with appropriately.

If a member of staff believes that a breach of this Policy has occurred or is likely to occur, they must notify their manager and/or the Company Secretary as soon as possible. If the staff member is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, it should be raised with their manager and/or the Company Secretary.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains.

## **6 The Company's Supply Chain**

The Company expects all of its new and existing suppliers to comply with the requirements of the Act. The Company will conduct due diligence on suppliers and seek to only procure goods and services from entities that meet the requirements under the Act. The extent of the due diligence conducted will depend on the types of goods or services being sourced, and the supplier. Examples of the due diligence that may be conducted include requesting:

- confirmation from the supplier that it complies with the Act (as required);
- a copy of the supplier's most recent Modern Slavery Statement (if applicable);

- details of the structure and operations of the supplier's supply chain; and/or
- details of the actions taken by the supplier to manage and address modern slavery risks in their supply chain.

The Company's annual Modern Slavery Statement submitted to the Department of Home Affairs requires reporting on the risks of modern slavery practices in the operations and supply chain of the Company to be identified and for the reporting of actions taken by the Company to address these risks (including due diligence undertaken). The audits are undertaken with a view to satisfy these requirements in the Modern Slavery Statement.

In the event a supplier identifies any occurrence of, or a material risk of, modern slavery in their supply chains or operations, the supplier must notify the Company and take practical and effective steps to address that occurrence or risk. The Company will discontinue arrangements with suppliers where it is apparent that those suppliers have not taken reasonable steps to prevent or prohibit modern slavery in their business operations.

## **7 Non-compliance with this Policy**

Any breaches of this Policy will be taken seriously and dealt with on a case by case basis.

A breach of this Policy by an employee may lead to disciplinary action being taken in accordance with the Company's disciplinary process. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to the Company's disciplinary procedure.

A breach of this Policy by a supplier will also be dealt with on a case by case basis and in accordance with the Company's Contractor management policies. Depending on the behaviour, the Company may choose to adopt a zero-tolerance stance towards the Supplier's behaviour and look at methods of preventing further engagement with the Supplier or may decide to work with the Supplier so they become compliant with this Policy.

## **8 Administration**

If you have any questions about this Policy, please contact the Company Secretary.

### **POLICY INFORMATION**

#### **Policy status**

Approved

**Approval Body:** Board