



## Modern Slavery Policy

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Otto IT Pty Ltd  
ABN. 23 968 132 622  
4/405 High St Northcote,  
VIC 3070, Australia  
1300 688 648

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<b>To:</b>	Otto IT Leadership Team
<b>From:</b>	Integrator

## Modern Slavery Policy

Otto IT is committed to its contribution to ending all forms of modern slavery, taking meaningful action to identify and address modern slavery while regulating the modern slavery risks in our operations, supply chain and across all business relationships.

The purpose of this Policy is to ensure that Otto IT is compliant with applicable laws and regulations with set standards of behaviour required of all persons working for or on behalf of Otto IT.

### Definitions

“Modern slavery” describes situations where a person or entity uses coercion, threats, or deception to seriously exploit and undermine their freedom.

Modern slavery is defined in the Modern Slavery Act 2018 (Cth) as:

- Slavery, servitude, forced and compulsory labour;
- Committing any offense with the intention to commit human trafficking;
- Aiding, abetting, counselling, or procuring any of the above offences;
- Forced marriage, bonded labour, the worst forms of child labour; or
- Deceptive recruiting for labour or services

“Human trafficking” - the recruitment, harbouring and transportation/transfer or receipt of a person, by means of coercion, threat, deception, fraud, abuse of power and abduction for the exploitation through means of modern slavery.

“Slavery” – the condition where an offender exercises the powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way;

“Servitude” – the condition where the victim’s personal freedom is significantly restricted and because of the use of coercion, threat or deception, they are not free to stop working or leave their place of work;

“Forced labour” – the condition where the victim is not free to stop working or leave their place of work because of the use of coercion, threat or deception;

“Forced marriage” – the condition where the marriage in which one or both of the parties is married without his or her consent, against his or her will, through coercion, threat or deception or the victim does not comprehend or is incapable of understanding the nature and influence of the marriage ceremony;

“Deceptive recruiting” – the condition of a victim being deceived about whether they will be exploited through a form of modern slavery

“Bonded labour” – also referred to as debt bondage is the condition where a person must work to pay back an inherited debt or debt incurred as part of the terms of employment. The debt is unmistakably disproportionate, the victim’s services are not applied to eliminate the debt, or the duration and nature of the services are not limited and identified;

“Worst forms of child labour” – the condition where the work deprives the children of their childhood, their potential, and their dignity; work that exceeds a minimum number of hours; work that is mentally, physically, socially or morally dangerous and harmful to children; work that interferes with their schooling; or where children are used to produce or traffic drugs;

The terminology of “modern slavery” is only used to capture serious exploitation.

- a) It does not include practices related to substandard working conditions or underpayment of workers. Nevertheless, these practices are also illegal and harmful and may be present in some situations of the modern slavery act.
- b) These situations may escalate into a modern slavery breach if not addressed.

## Scope

This policy applies to all persons working for or on behalf of, or providing services to the Otto IT, including:

- Suppliers – any persons who supplies goods and services to the Otto IT including contractors, agents and consultants and their employees;
- Employees – any employees, directors, or officers of Otto IT;
- Associated entities – Any person/s affiliated with Otto IT as per the Corporations Act 2001, Section 50AAA.

## Obligations

- Otto IT does not use or condone child or forced labour in any of its operations or premises and will proactively work to ensure these practices are not present in its operations or supply chain.
- Otto IT will not tolerate any form of unacceptable treatment of workers identified in the *Modern Slavery Act 2018 (Cth)*.
- Otto IT will abide to all laws and regulations regarding pay practices and the classifications of employment according to the job level and status.
- Otto IT will actively promote awareness of modern slavery through training and support of Suppliers and Employees.
- Otto IT will commit to applying a continuous improvement approach to reducing the risks of modern slavery.
- Otto IT will continually monitor and review the effectiveness of this Policy.

## Supply Chain

- Otto IT will conduct risk assessments to determine which parts of the business and supply chains are most at risk from modern slavery.
- Otto IT will actively undertake risk-based assessments and due diligence in ensuring that all Suppliers operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed.
- Otto IT will partner with the Suppliers to gain a proper understanding of the measures they have in place to identify and address modern slavery risks.
- Otto IT will include specific modern slavery provisions in contractual documentations with suppliers.
- Suppliers are expected to operate with similar values to Otto IT in relation to modern slavery and demonstrate ongoing commitment to eradicating modern slavery in its own business and supply chain.
- In the event Otto IT becomes aware that any supplier does not meet their contractual obligations to anti-slavery, Otto IT will engage directly with the Supplier and develop an action plan to eradicate the practice in a transparent, timely and efficient manner.

## Discipline under this policy:

Management of Otto IT has the responsibility of overseeing this policy. Supervisors and managers will ensure employees are compliant with all areas of this policy, including any disciplinary action resulting from non-compliance. This action can range from a warning through to possible legal action, to termination if proven responsible.

## Version Control

Version	Date	Author	Comment
1.0	28/08/2023	A. Kane	Policy created