

RPMGlobal Holdings Limited

ACN 010 672 321

Modern Anti-Slavery Policy

Adopted by the Board on 9 July 2019

Last reviewed by the Board on 23 August 2021



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1. Introduction

RPMGlobal Holdings Limited and its related subsidiaries and group companies (together 'RPM' and the 'Company') acknowledge the fundamental human rights contained in the *Universal Declaration of Human Rights 1948* ('UDHR') and agree that Modern Slavery is a serious violation of one's dignity and human rights.

Exploitative practices including but not limited to human trafficking, slavery, servitude, forced labour, debt bondage and forced marriage are all considered Modern Slavery and are serious crimes recognised and punishable under Australian law. Aligned with RPM's Core Values of Integrity, Equity and Accountability, the Company is committed to protecting and advancing human dignity and human rights by managing the risk of Modern Slavery throughout its supply chain, domestic and international business practices and any other business relationships.

This Modern Anti-Slavery Policy (the '*Policy*') reflects RPM's commitment to using its best endeavours where possible to maintain the risk of Modern Slavery and the Company's compliance with the *Modern Slavery Act 2018* (Cth) and *Modern Slavery Act 2018* (NSW).

2. Scope

This Policy applies to all persons working for or on behalf of RPM in any capacity, and includes employees, directors, officers, contractors, subcontractors, and any other third parties that deal with RPM. In conjunction with the '[United Nations; Guiding Principles on Business and Human Rights](#)', this Policy sets out to maintain and improve current business practices within RPM's scope to prevent Modern Slavery. The Company recognises the current size, operations and industry in which it functions and acknowledges the broad scope of this Policy.

3. Compliance with the Policy

RPM prohibits conduct that constitutes *Modern Slavery* as defined in the *Modern Slavery Act 2018* (Cth). RPM and its employees, directors, officers, contractors, subcontractors, and any other third parties that deal with RPM must not directly or indirectly, encourage or engage in any conduct that constitutes Modern Slavery, this includes, but is not limited to:

- a) Engaging in the trafficking in persons through the recruitment, harbouring and movement of persons for exploitation through modern slavery;
- b) Engaging in the conduct of business involving sexual servitude such as procurement of commercial sex acts;
- c) Engaging in conduct involving slavery where a person or organisation exercises powers of ownership over another person, including the power to make a person an object of purchase and use their labour in an unrestricted way;

- d) Engaging in conduct involving servitude where a person's personal freedom is significantly restricted and they are not free to stop working or leave their place of work;
- e) Engaging in conduct involving forced labour where a person is either not free to stop working or not free to leave their place of work;
- f) Engaging in conduct involving forced marriage where coercion, threats or deception are used to make a person marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
- g) Engaging in conduct involving debt bondage where a person's services are pledged as security for debt and the debt is manifestly excessive or the person's services are not applied to liquidate the debt, or when the length or nature of the services are not limited and defined;
- h) Engaging in conduct involving child labour where children are exploited through slavery or similar practices, including for sexual exploitation, or where children are engaged in hazardous work which may harm their health, safety or morals, or where children are used to produce or traffic drugs; or
- i) Engaging in conduct involving deceptive recruiting for labour or services where a person is deceived about whether they will be exploited through a form of modern slavery.

4. Modern Slavery Statement

As part of RPM's obligations under the *Modern Slavery Act 2018* (Cth) and *Modern Slavery Act 2018* (NSW), the Company will prepare a Modern Slavery Statement within six (6) months of the end of each Australian Financial Year. Each Modern Slavery Statement will describe:

- a) The risks of modern slavery practices in the operations and supply chains of the Company;
- b) The actions taken by the Company to assess and address these risks, including due diligence and remediation processes;
- c) The methods adopted by the Company to assess the effectiveness of these actions;
- d) The process of consultation with RPM's subsidiaries in relation to this Policy; and
- e) Any other information that may be relevant.

A copy of RPM's Modern Slavery Statement for the Financial Year ending 30 June 2020 can be found on the Australian Border Force's website.

5. Due Diligence Processes

RPM acknowledges and understands that serious penalties may be incurred and reputational damage may be inflicted on the Company if it encourages or engages in conduct constituting Modern Slavery. RPM requires all of its suppliers and third parties to observe the Supplier Code of Conduct (the 'Code'). The Code

requires suppliers, contractors, subcontractors, partners and any other third parties that deal with RPM to comply with all applicable laws and regulations in the countries in which they operate, and prohibit forced labour, human trafficking, debt bondage and the use of and Modern Slavery within their organisation and supply chains.

6. Review

This Policy will be reviewed annually by the Board of Directors (the 'Board') and if necessary, will be amended by way of resolution to ensure RPM remains transparent on their current business practices.

This Policy was made in accordance with the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2019 (NSW) and represents RPM's current position on Modern Slavery for the financial year ended 30 June 2020.

This Policy was approved by the Board on 9 July 2019 and last reviewed on 23 August 2021.