



# MODERN SLAVERY POLICY

March 2022

**Infomedia LTD**

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## 1. POLICY APPLICATION

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- 1.1. In this policy, a reference to '**Infomedia**' or to '**Company**' is a reference to Infomedia Ltd ACN 003 326 243 and its related bodies corporate, including without limitation, all subsidiary companies.
- 1.2. This policy applies to all directors, officers, employees and contractors of Infomedia, whether permanent, fixed term or temporary (**Infomedia personnel**) and all suppliers making a supply to Infomedia.

## 2. POLICY STATEMENT

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Infomedia is committed to acting ethically and with integrity in all business relationships and maintaining and improving systems and processes to avoid complicity in human rights violations within our own operations and within our direct supply chain.

At Infomedia we acknowledge our role, where appropriate, in seeking to safeguard human rights through ethical and sustainable business practices. We also recognise the growing importance of human rights issues to our key stakeholders including our employees, shareholders and our customers.

## 3. PURPOSE OF THIS POLICY

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- 3.1. The purpose of this policy is to:
  - 3.1.1. provide awareness about Modern Slavery;
  - 3.1.2. encourage individuals to be on the lookout for and to report suspected acts of Modern Slavery;
  - 3.1.3. outline the responsibilities of Infomedia personnel in recognising and dealing with Modern Slavery; and
  - 3.1.4. ensure Infomedia has methods in place to detect and, where possible, prevent Modern Slavery.

## 4. WHAT CONSTITUTES MODERN SLAVERY

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Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.

Practices that constitute modern slavery can include:

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|---------------------|-----------------------------------|
| ▪ human trafficking | ▪ debt bondage                    |
| ▪ slavery           | ▪ forced marriage, and            |
| ▪ servitude         | ▪ the worst forms of child labour |
| ▪ forced labour     |                                   |

Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. These practices are also harmful and may be present in some situations of modern slavery.

Modern slavery can occur in every industry and sector and has severe consequences for victims. Modern slavery also distorts global markets, undercuts responsible business and can pose significant legal and reputational risks to entities.

## 5. INFOMEDIA'S ACTIONS TO COMBAT MODERN SLAVERY

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### *Training*

Infomedia provides appropriate compliance training for its people to help them understand what Modern Slavery is, warning signs and indicators of Modern Slavery and regulatory compliance.

## *Supplier Due Diligence*

Where appropriate and feasible, Infomedia will:

- (a) conduct due diligence on its immediate supply chain;
- (b) conduct a risk assessment to determine areas of its supply chain which are most at-risk of Modern Slavery;
- (c) include clauses in its procurement contracts pertaining to modern slavery which:
  - provide commitments to addressing and eradicated Modern Slavery within the supplier's supply chain;
  - warranting that the supplier has not been convicted of a Modern Slavery offence;
  - warranting that the supplier has conducted Modern Slavery due diligence on its own supply chain and that it has implemented appropriate risk minimisation strategies.

The Company recognises that some or all of these actions may not be achievable in every instance, particularly where the market for relevant goods is marked by limited competition and/or large industry players with whom contract terms are non-negotiable. In those instances, Infomedia will make an informed decision weighing up all relevant factors to make the best possible decision which is, foremost, in the interests of the Company. Stakeholder interests, the Company's policies and risk will be factored into the decision-making process.

## *Modern Slavery Statements*

Infomedia will prepare and publish Modern Slavery Statements in accordance with the *Modern Slavery Act 2018* (Cth) or such other laws to which Infomedia Ltd is amenable.

## **6. REPORTING BREACHES AND SUSPICIOUS BEHAVIOUR**

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If an employee, contractor or shareholder of Infomedia is aware that Infomedia, or any supplier of goods or services to Infomedia, is engaged in Modern Slavery practices, or is in breach of the law, the individual should report the breach pursuant to the Company's Whistleblower Policy.

Infomedia will protect those individuals that report or identify Modern Slavery occurring within the Company and its supply chains in the manner and circumstances described in the Whistleblower Policy.