

# Modern Slavery Act Statement



## Introduction

This statement outlines the actions undertaken by Finsbury Green Pty Ltd that are within the scope of the *Modern Slavery Act 2018* in relation to activities undertaken to identify and mitigate the risk of modern slavery and human trafficking occurring in its supply chain or business.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Finsbury Green has zero tolerance to any form of modern slavery. We are strongly committed to playing our part in eradicating modern slavery by ensuring we act ethically and with integrity and transparency in all business dealings and putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Finsbury Green is a leading Australian provider of print, managed services and logistics delivered with a high degree of expertise, flexibility and integrity.

## Our policies

Our internal policies ensure we are conducting business in an ethical and transparent manner which includes:

### Employees

Finsbury Green is committed to maintaining a safe workplace that values equal opportunity and that is free from discrimination, harassment and victimisation. Finsbury Green operates in a highly regulated environment and has robust policies and procedures concerning employment screening (including work eligibility checks), employment conditions and appropriate workplace behaviour.

### Codes of conduct

Our policies define the objectives and rules that reflect our commitment to responsible, ethically and legally compliant behaviour from all employees and contractors.

### Whistleblowing

Where there is concern regarding any unethical conduct within our business, including any forms of modern slavery, we strongly encourage our employees to report the concern so we may properly and quickly resolve the situation.

### Suppliers

Finsbury Green's procurement process involves over 300 suppliers across Australia. Based on the supply chain profile, the risk of modern slavery is considered to be relatively limited.

Finsbury Green works with a wide and varied network of suppliers to execute and support solutions that we design for customers. Supplier due diligence is a critical part of what we provide for our customers and essential for the security and performance of our own business.

All suppliers to Finsbury Green must go through our due diligence process at the on-boarding stage and are then subject to regular audits and reviews.

We ensure our Supplier Agreements are signed by each supplier as part of the on-boarding process, with follow-up to ensure our policies are adhered to. We also review supply chain contracts to ensure they contain the appropriate legislative requirements.

These audits are based on perceived risk with a tiered approach taken to ensure each supplier's corporate social responsibilities are aligned with that of Finsbury Green and United Nations Global Compact, the UN Universal Declaration of



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Human Rights, as well as the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work, in addition to full compliance with Australian legislation, including the Modern Slavery Act 2018.

If we find breaches of our code or the Modern Slavery Act within our supply chain, we investigate the issues in detail. We support companies in their efforts to comply with the legislation. In the event of a serious breach, termination of the supplier relationship is considered.

### Key performance indicators

We measure the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain by:

- No reports being received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Completing annual due diligence, where necessary, on our supplier's code of conduct.

### Continuous improvement

We are committed to continually improving the way we educate and inform our employees about modern slavery. Going forward, we aim to:

- Further raise awareness across our procurement teams on indicators of modern slavery in the supply chain, and how best to respond and escalate any concerns identified.
- Continue to develop training for Finsbury Green employees to raise a general and consistent understanding of this subject, outlining what modern slavery is, how to identify it and what individuals should do if they suspect it is taking place within, or associated to, our organisation.

### Governance

This Modern Slavery Act Statement was approved by the Finsbury Green Board and will be updated annually.

#### **Luke Tindale**

*Chief Executive Officer*