

MODERN SLAVERY POLICY

Purpose

The policy outlines Zeal Futures' commitment to identifying, preventing, and addressing modern slavery risks in our supply chains and operations. We are dedicated to upholding human rights and ensuring our business practices do not contribute to modern slavery, in accordance with the Modern Slavery Act 2018 (Cth) and relevant provisions of the Criminal Code Act 1995.

Scope

All Zeal Futures Staff, Directors, Hosted Employees, Independent Contractors, and Volunteers (henceforth referred to as Zeal Futures Associates) are covered by this policy.

Responsibilities

Human Resources is responsible for the development, implementation, and review of this policy.

It is the responsibility of all Zeal Futures Board Members, Staff and Suppliers to ensure that they adhere to this policy.

Document Owner

Group HR & Safety Manager

Policy

1. Our commitment

We are committed to acting ethically and with integrity in all our business dealings, which includes implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our business or supply chains. We commit to complying with all applicable laws, including the Modern Slavery Act 2018 (Cth) and relevant criminal provisions under the Criminal Code Act 1995, such as those relating to slavery, servitude, forced labour, and human trafficking.

2. Defining Modern Slavery

Modern Slavery means conduct which would constitute:

- a) An offence under Division 270 or 271 of the Criminal Code; or
- b) An offence under either of those Divisions if the conduct took place in Australia; or
- c) Trafficking persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organised Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- d) The worst forms of child labour, as defined in Article 3 of the ILO Convention (No.182) concerning the Prohibition and Immediate Action for the Elimination of the Works Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

The Australian government has developed definitions of human trafficking, slavery and slavery-like practices.

Human Trafficking: the movement of a person into, out of, or within Australia using coercion, threats or deception for certain exploitive end purposes. These exploitive end purposes are slavery, servitude, forced labour, forced marriage and debt bondage.

Slavery: occurs when a person exercises the rights of ownership over another person. This includes the power to make the victim an object of purchase or to use their labour or services in a substantially unrestricted manner.

Servitude: occurs when the victim does not consider themselves free to cease providing their labour or services or to leave their place or area of work because of the use of coercion, threats or deception. To be in a condition of servitude, the victim must also be significantly deprived of their personal freedom.

Forced labour: occurs when the victim does not consider themselves free to cease providing their labour or services or to leave their place or area of work because of the use of coercion, threats or deception.

Forced marriage: occurs when the victim gets married without freely and fully consenting because they have been coerced, threatened or deceived or because they are incapable of understanding the nature and effect of a marriage ceremony.

Debt Bondage: occurs when the victim pledges their services or the services of a third person as security for a real or purported debt where this debt is: manifestly excessive; or the reasonable value of their services is applied to the debt; or the length and nature of their services are not limited or defined.

Under the Act, modern slavery broadly includes all forms of trafficking in persons, slavery and slavery-like practices and the works forms of child labour. This includes forced labour, forced marriage, child prostitution and children working hazardously, and other conduct that would be an offence under the Criminal Code Act 1995 (Cth)

3. Zeal Futures Approach to limiting the risk of Modern Slavery practices

3.1 Risk Identification and Management

To maintain our commitment, Zeal Futures conducts regular risk assessments of our operations and supply chains. This includes mapping of our supply chains to identify areas of potential risk and engaging with suppliers to ensure they understand and comply with our standards.

Zeal Futures requires suppliers to confirm they have policies and procedures in place to prevent modern slavery, this process includes supplier vetting and onboarding procedures, contractual clauses requiring compliance with anti-slavery laws.

3.2 Zeal Futures Operations

Zeal Futures maintains a Modern Slavery Policy (this policy) outlining our approach to reducing the risk of modern slavery practices with our supply chains and operations. The policy provides guidance on the steps Zeal Futures take to reduce risks and outline the range of support available for when a Zeal Futures person becomes aware that someone is at risk of or affected by modern slavery practices.

When existing policies undergo review or new policies are developed, policy owners are required to identify existing modern slavery commitments that can be enhanced, or where modern slavery protection can be incorporated.

Zeal Futures supply chain includes sourcing apprentices and trainees for our clients. This may involve the introduction of external agencies for onward supply of candidates to our clients, or the direct introduction of candidates to our clients by Zeal Futures.

As a Group Training Organisation, Zeal Futures are not required to hold a Labour Hire Licence in NSW. Zeal Futures is licensed in both QLD and ACT, as required by their state legislation. The final report of the Migrant Worker's Taskforce handed down in March 2019 identified four high risk sectors which were horticulture, meat processing, cleaning and security. Zeal Futures only supplies limited apprentices and trainees in horticulture and does not currently supply apprentices or trainees to the meat processing, cleaning or security industries.

3.3 Zeal Futures Suppliers

Zeal Futures contract third parties who provide services to assist with the everyday running of our business, such as cleaners and IT service providers as well as companies who provide office supplies and other consumables to our offices.

Acknowledging that by engaging third party organisations, there is a risk that we unwittingly contribute to modern slavery practices. Zeal Futures require all suppliers to use their best endeavours to ensure that there is no modern slavery practices in their supply chains and operations; and that they aspire to high ethical standards where they operate in an ethical, legally compliant and professional manner. Zeal Futures expect all existing and new suppliers to comply with all laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed.

In the event suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify Zeal Futures as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

3.4 Training and Awareness

Zeal Futures provides training for employees to raise awareness of modern slavery risks and reporting mechanisms.

4. Reporting Concerns of Modern Slavery

A key element of Zeal Futures' approach to contributing positively to the ending of modern slavery practices is to enable all Zeal Futures Associates to feel comfortable in speaking up when there are reasonable grounds to suspect that Zeal Futures or Zeal Futures employees are not acting ethically or in accordance with laws and obligations.

Where a Zeal Futures Associate believes in good faith and on reasonable grounds that a Zeal Futures associate or supplier is not acting in compliance of this policy, suspects ethical issues or illegal activities; that associate should report their concern to their Zeal Futures Supervisor or Workforce Solutions Specialist (WSS) in the first instance. Where the Zeal Futures Supervisor or Workforce Solutions Specialist (WSS) may be complicit in the breach, the report should be referred to the Group HR & Safety Manager. Depending on the nature of the issue, the matter may be discussed with the Zeal Futures Chief Executive Officer.

Approved by the Board of Directors on 19th February 2026

Due consideration has been given to legislation that may have been pertinent in the development of this policy. The relevant components have been incorporated and are again considered when conducting the policy review process.

Document History

Version	Prepared By	Approved By	Date	Description
1.0	A Malloy	Board of Directors	01/05/2024	Updated
1.1	A. Malloy		01/10/2024	Update- extend Board Review to 2025 pending consolidation of Company Policies
2.0	T. Oswald	Board of Directors	19/02/2026	Updated – ownership transferred to Group Finance Manager