



Anti-Slavery Policy

Reozone is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains, or through any other business relationship.

This policy applies to all persons working for or on behalf of Reozone, in any capacity, including employees, directors, officers, agency workers, suppliers, contractors, consultants, and any other third-party representatives.

Reozone expects all who have, or seek to have, a business relationship with the company to familiarise themselves with this policy and to act consistently with our values. Reozone will only do business with organisations that fully comply with this policy, or those who are taking verifiable steps towards compliance.

This policy underpins and informs Reozone's annual Modern Slavery Statement as required under the Commonwealth Modern Slavery Act 2018 (Cth).

What do we mean by Modern Slavery?

Modern slavery is the severe exploitation of people for personal or commercial gain. The Commonwealth Modern Slavery Act 2018 defines modern slavery as including eight forms of exploitation:

1. Trafficking in persons – arranging or facilitating the movement of people for exploitation.
2. Slavery – exercising powers of ownership over an individual.
3. Servitude – where a person is significantly deprived of their freedom and cannot refuse or leave due to coercion.
4. Forced marriage – where a person is married without free and full consent because of threats, coercion, or deception.
5. Forced labour – work or services extracted from a person under threat, coercion, or deception, where they cannot refuse or leave.
6. Debt bondage – work demanded to repay a debt, where the debt is manipulated or repayment terms are unfair.
7. Deceptive recruiting for labour or services – misleading a person about the conditions of work or services, causing them to be exploited.
8. The worst forms of child labour – situations where children are subjected to slavery or similar practices, or engaged in hazardous work that threatens their health, safety, or morals.

Embedding the Policy in Practice

To give effect to this policy, Reozone will:

- Conduct risk assessments to identify which parts of our business and supply chains are most at risk of modern slavery, so efforts can be focused accordingly.
- Engage directly with new and existing suppliers to understand the measures they have in place to prevent modern slavery.
- Incorporate prohibitions against slavery, servitude, forced labour, trafficking, child labour, forced marriage, debt bondage, and deceptive recruiting into our contractual documentation.
- Require contracted suppliers to hold their own suppliers to the same standards.
- Reserve the right to terminate contractual arrangements if a supplier is found to be in breach of this policy.

Grievance Mechanism

Reozone has established a confidential grievance mechanism for employees, contractors, and suppliers to report any concerns related to modern slavery or workplace conditions.

- Multiple reporting channels are available (line manager, QHSE Officer, confidential hotline, complaint box).
- Reports can be made anonymously and will be treated in strict confidence.
- No worker will face retaliation for raising concerns in good faith.

Responsibility for This Policy

Senior management has overall responsibility for this policy and in ensuring that Reozone complies with all its legal and ethical obligations. The General Manager will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively. The QHSE Team is responsible for maintaining risk assessments, supplier due diligence, and reporting on compliance.

Training and Awareness

- All employees will receive awareness training on modern slavery risks and reporting mechanisms.
- Managers, HR, Procurement, and QHSE staff will receive additional role-specific training.
- Suppliers will be made aware of this policy and our expectations through onboarding and engagement processes.

Review

This policy will be reviewed annually, or more frequently if required, to ensure it remains relevant, effective, and aligned with legislative requirements.

Aaron Hadfield & John Incollongo
Managing Directors