

Anti-Slavery Policy

STAR Group is committed to limiting the risk and not tolerating modern slavery by infiltrating its supply chains or through any other business relationship. Star Group will only do business with organisations who fully comply with legislation, or those who are taking verifiable steps towards Modern Slavery compliance. This policy will be used to underpin how Star Group will comply with legislation in managing the risk of slavery and human trafficking and produce transparency in procurement and supply chain requirements of the Modern Slavery Act 2018 (NSW).

Application

This Policy applies to employees and third parties including contractors, subcontractors (including temporary subcontractors) customers and agents (including suppliers, manufacturers, designers and importers) that work for the Star Group, collectively referred to in this Policy as 'workplace participants'.

What Do We Mean by Modern Slavery?

Modern slavery can take many forms; it is a complex and multi-faceted problem. There are four key criminal activities:

- Slavery: where ownership is exercised over an individual
- Servitude: involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which will not be tolerated, but are not limited to:

- Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common, the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires workplace participants to play a part and remain vigilant to the risk in all aspect of the business and business relationships.

We will:

- Provide transparency and ensure Star Group meets its ethical and legal obligations
- Embed risk assessments into procurement and supply chain activities to identify risks
- Provide and maintain information, instruction and education and training for our workplace participants about Modern Slavery
- Communicate and consult with relevant procurement and supply workplace participants about the risks
- Where appropriate, will engage directly with new suppliers in respect of the Anti-Slavery Policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.
- Contractual documentation will incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy.
- Make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.
- Identify, assess, monitor and report on risks, improvement and compliance. Will complete compliance reporting in accordance with legislation.

Your Commitment

Take reasonable care by managing risks within your area of responsibility. As well as to cooperate and comply with all policies, procedures and instructions.



CHRIS MULVEY

GROUP MANAGING DIRECTOR

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