



Modern Slavery Policy

Modern Slavery Policy

AUT-CORP-PO-CS-0006 | Revision 1 | 04 Aug 2026

Revision History				
Rev	Date	Summary of Changes	Author	Approved
0	17-Jan-25	Original issue	John Ha	Adrian Krop
1	04-Aug-26	Reissued in the AUTONOMA controlled-document template. Reporting status, risk indicators, due diligence and remediation sections added.	Adrian Krop	John Ha



DOCUMENT CONTROL

Document number	AUT-CORP-PO-CS-0006
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CHANGES IN THIS REVISION

- Reissued in the AUTONOMA controlled-document template and assigned document number AUT-CORP-PO-CS-0006.
- AUTONOMA's status stated as below the consolidated revenue threshold for a reporting entity under the Modern Slavery Act 2018 (Cth), applying the Act's principles voluntarily and supporting clients' reporting obligations.
- Citation corrected to the Modern Slavery Act 2018 (Cth), and the Criminal Code Act 1995 (Cth) and Fair Work Act 2009 (Cth) added.
- Definitions section added.
- New section added identifying modern slavery risk indicators in AUTONOMA's own operations and supply chain, including imported equipment and components, labour hire, cleaning and freight.
- New sections added for supplier due diligence and self-assessment, contract requirements, recruitment and labour hire, and the response to an identified case, with remediation stated as the first response and termination as the last.
- Grievance channels and access to remedy stated, cross-referenced to AUT-CORP-PO-CS-0002 Code of Conduct.
- Responsibilities restated against the standard AUTONOMA role set, replacing Management and the Procurement Team.
- Training and Competency, and Monitoring, Records and Review sections added, including a records and retention table and the review trigger.



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1 PURPOSE

Autonoma Technology Pty Ltd (AUTONOMA) imports laboratory automation equipment, instruments and components, engages labour hire, cleaning, freight and installation services, and supplies clients who are themselves accountable for the labour conditions in their supply chains. This policy exists so that no person is exploited in the production, transport, installation or servicing of anything AUTONOMA buys, builds or sells, and so that where exploitation is found the people affected are made better off rather than simply cut loose.

It affirms AUTONOMA's commitment to respecting human rights and rejecting every form of modern slavery, including forced labour, human trafficking, debt bondage and child labour, and sets the principles, risk assessment, due diligence, contract, remediation, grievance and training requirements that give effect to that commitment.

2 SCOPE

This policy applies to all AUTONOMA workers, officers and Directors, and to contractors, consultants, agents, labour hire providers, suppliers and business partners, across all regions and operations.

It covers all activities, including procurement, recruitment, engagement of labour hire, subcontracting, importing, freight and logistics, facilities services, and supply chain management, and it extends beyond AUTONOMA's direct suppliers to the suppliers of those suppliers to the extent that AUTONOMA has leverage over them.

It does not create an obligation on AUTONOMA to publish a statement under the Modern Slavery Act 2018 (Cth), because AUTONOMA is not a reporting entity. It does not displace the primary legal duty of an employer, labour hire provider or supplier to comply with the labour law applying to it.

3 DEFINITIONS

Term	Meaning
Modern slavery	Conduct amounting to a practice defined in section 4 of the Modern Slavery Act 2018 (Cth), including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.
Forced labour	Any work or service exacted from a person under the menace of a penalty, and for which the person has not offered themselves voluntarily, including work rendered voluntarily but continued under threat of a sanction.
Debt bondage	The status or condition arising where a person pledges their labour, or the labour of a person under their control, as security for a debt, where the value of the work is not reasonably applied to the debt or the term and nature of the work are not limited and defined.



Term	Meaning
Deceptive recruiting	Recruiting a person for work by deceiving them about the nature of the work, the pay, the hours, the location, the conditions, the existence of a debt or the freedom to leave.
Worst forms of child labour	Work performed by a child that is slavery, sexual exploitation, use in illicit activities, or work that is likely to harm the child's health, safety or morals.
Reporting entity	An entity with consolidated revenue at or above the threshold in section 5 of the Modern Slavery Act 2018 (Cth), which must give the Australian Border Force an annual modern slavery statement.
Recruitment fee	Any fee, charge, deposit, bond, commission or deduction imposed on a worker in connection with obtaining or retaining work, including for recruitment, placement, transport, accommodation, training, visas, medical checks or documentation.
Higher-risk supplier	A supplier assessed as presenting elevated modern slavery risk on the basis of its sector, its country of operation, its use of low-skilled or migrant labour, its use of labour hire or subcontracting, or the opacity of its own supply chain.
Remediation	The action taken to correct a harm suffered by a worker and to prevent its recurrence, including repayment of fees, payment of unpaid wages, return of documents, restoration of freedom of movement, safe exit, and correction of the practice that caused the harm.
Grievance channel	A route by which a worker, in AUTONOMA or in its supply chain, can raise a concern about their working conditions and have it acted on without reprisal.

4 POLICY STATEMENT

AUTONOMA is committed to the following principles and will:

1. Respect internationally recognised human rights, including those in the International Bill of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.
2. Apply zero tolerance to modern slavery in any form, in its own operations and in its supply chain, and refuse to knowingly benefit from it.
3. Require ethical recruitment, in which no worker pays a fee to obtain or keep work, every worker retains their own identity and travel documents, and every worker receives a written contract before starting work in a language in which they are proficient.
4. Require safe, fair and voluntary working conditions, with lawful wages paid on time, lawful hours, no unlawful deduction, freedom of movement, and freedom to end employment on reasonable notice.
5. Maintain transparency and accountability in its operations and supply chains, including by answering client and stakeholder questions about them truthfully and on the basis of evidence held.



6. Assess modern slavery risk across its own operations and its supply chain at least annually, and record the assessment in AUT-CORP-RG-SA-0005 Corporate Risk Register.
7. Conduct due diligence on suppliers and contractors before engagement, proportionate to the assessed risk, and require a written self-assessment from every higher-risk supplier.
8. Include modern slavery obligations in its purchase orders and supply agreements, including the right to audit, the obligation to disclose and the obligation to remediate.
9. Treat remediation, capability building and continued engagement as the first response to an identified case, and treat termination of the relationship as the last response.
10. Provide grievance channels through which any worker, including a worker in its supply chain, may raise a concern, including anonymously, and protect that person from reprisal.
11. Train every worker whose role involves purchasing, engaging labour or receiving goods to recognise the indicators of modern slavery and to escalate them.
12. Comply with the Modern Slavery Act 2018 (Cth), the Criminal Code Act 1995 (Cth), the Fair Work Act 2009 (Cth) and all other applicable law, and require its suppliers and contractors to comply with the law and international standards applying to them, including the Modern Slavery Act 2018 (Cth), the Modern Slavery Act 2015 (UK) where that Act applies to the supplier, the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization Conventions.

No cost saving, delivery date or client requirement justifies engaging a supplier that AUTONOMA knows, or reasonably suspects, uses modern slavery.

5 ROLES AND RESPONSIBILITIES

Table 1: Modern slavery responsibilities

Role	Responsibility
Directors	Own this policy and are accountable for its implementation and oversight. Approve the annual modern slavery risk assessment. Approve the remediation plan for every identified or suspected case, and decide whether a relationship is suspended or terminated. Approve any voluntary modern slavery statement before publication. Review risk, due diligence coverage, cases and remedy outcomes at each management review, held at least annually.
Managing Director	Approves this policy and each revision. Signs client questionnaire responses and any voluntary statement. Determines the outcome of a substantiated internal breach.
HSEQ Manager	Maintains this policy, the supplier risk assessment, the self-assessment records and the case record. Issues and evaluates supplier self-assessments, plans and conducts supplier audits, tracks remediation plans to closure, delivers training and verifies competency. Prepares responses to client supplier questionnaires for the Managing Director's signature. Reports overdue actions to the Directors monthly.



Role	Responsibility
Operations Manager	Conducts modern slavery due diligence on suppliers, labour hire providers, cleaning providers and freight providers before engagement and at reassessment. Ensures purchase orders and service agreements carry the clauses in <i>Contract Requirements</i> . Reports any indicator observed at goods receipt, on a supplier visit or at a service provider's premises.
Project Manager	Assesses modern slavery risk in the subcontract and labour arrangements for a project before award, and reports any indicator observed on a client or subcontractor site.
Supervisors	Watch for the indicators in Table 2 among workers under their direction, including labour hire workers, and report any indicator to the HSEQ Manager on the day it is observed. Ensure no worker is charged a fee, has documents withheld, or is prevented from leaving at the end of a shift.
Workers	Comply with this policy. Complete the training required for their role. Report any concern or suspected case of modern slavery, in AUTONOMA or in its supply chain, through any channel in <i>Grievance Channels and Access to Remedy</i> .
Contractors and Suppliers	Comply with this policy and AUT-CORP-PO-CS-0002 Code of Conduct. Complete the self-assessment where required. Charge no worker a recruitment fee. Disclose any modern slavery risk or incident in their own operations or supply chain. Pass these requirements down their supply chain. Permit audit, including of worker accommodation where a specific risk is identified. Complete an agreed remediation plan.
Visitors	Comply with site directions. A visitor who observes an indicator of modern slavery at an AUTONOMA workplace may report it through the channels in this policy.

6 REPORTING STATUS AND SUPPORT FOR CLIENT REPORTING

AUTONOMA's consolidated revenue is below the threshold in section 5 of the Modern Slavery Act 2018 (Cth). AUTONOMA is therefore not a reporting entity and is not required to give the Australian Border Force an annual modern slavery statement.

AUTONOMA applies the principles of the Act voluntarily. It assesses risk, conducts due diligence, remediates identified harm, measures the effectiveness of its actions and consults with the entities it controls in the same way a reporting entity would, at a scale proportionate to its size and risk.

Many AUTONOMA clients are reporting entities and must describe the modern slavery risks in their own supply chains, of which AUTONOMA forms part. AUTONOMA supports those obligations by:



- Responding to client supplier questionnaires, self-assessment questionnaires and audit requests fully, accurately and within the client's stated timeframe, or within 20 working days where no timeframe is stated.
- Answering only on the basis of evidence AUTONOMA holds, and stating clearly where a control is planned rather than in place. AUTONOMA does not claim a certification, an audit outcome, a supply chain map or a statement it does not hold.
- Providing this policy, AUT-CORP-PO-CS-0002 Code of Conduct and its supplier due diligence records to a client on request.
- Notifying an affected client where AUTONOMA identifies a substantiated case of modern slavery in a supply chain that serves that client.

The Managing Director signs every questionnaire response, and the HSEQ Manager retains the response with the evidence relied on. Where the Directors decide to publish a voluntary modern slavery statement, the statement is described in it as voluntary, is approved by the Directors before publication, and is not described as a statement given under the Act.

7 MODERN SLAVERY RISK IN AUTONOMA'S OPERATIONS AND SUPPLY CHAIN

The HSEQ Manager assesses modern slavery risk at least annually, covering AUTONOMA's own workforce and each category of goods and services it buys. The assessment considers the sector, the country of manufacture or service delivery, the labour model, the visibility AUTONOMA has of the tiers below its direct supplier, and the vulnerability of the workers involved. The result is recorded in AUT-CORP-RG-SA-0005 Corporate Risk Register with an owner and the actions arising.

Table 2: Modern slavery risk areas and indicators

Risk area	Why the risk arises	What to look for
Imported equipment, instruments and subassemblies	Manufacture and assembly occur several tiers below AUTONOMA in countries where labour protections vary, and AUTONOMA rarely sees the factory	No response or an evasive response to a self-assessment; refusal of an audit; a price materially below the market for the specification; no visibility of the manufacturing site
Electronic components, cabling, plastics and metals	Long, opaque upstream chains, including mineral extraction and component assembly	No supply chain information beyond the first tier; no conflict minerals or responsible sourcing position; unwillingness to name the manufacturer
Labour hire and contract technicians	Migrant and visa-dependent workers, fees charged by intermediaries, layered subcontracting	A worker who does not know who employs them; deductions the worker cannot explain; a worker who has paid to obtain the placement; identity documents held by the provider
Cleaning and facilities services	Low margin, subcontracted, often performed outside normal hours with little supervision	Workers changing frequently with no handover; workers paid in cash; work performed by a person other than the one named on the roster; hours worked that exceed those invoiced



Risk area	Why the risk arises	What to look for
Freight, logistics, warehousing and installation labour	Subcontracting to owner-drivers and casual crews at short notice, cross-border movement	A crew supplied at short notice with no records; a driver working hours inconsistent with fatigue requirements; no employment records available
Uniforms, personal protective equipment and consumables	Textile and light manufacturing sectors with known exploitation risk	No country of manufacture stated; no supplier code of conduct; a price inconsistent with lawful labour cost
Overseas installation, commissioning and service work	Local labour engaged through an in-country agent AUTONOMA does not directly manage	Agent unwilling to identify the workers or their employer; workers unable to speak freely; accommodation controlled by the agent
Recruitment of AUTONOMA workers	Use of overseas recruiters, visa sponsorship and relocation arrangements	Any fee charged to the worker; a contract in a language the worker cannot read; a bond, deposit or retention against departure

Indicators observed in any worker, in AUTONOMA or in its supply chain, that require immediate escalation include: a worker who cannot leave at the end of a shift; a worker whose identity or travel documents are held by another person; a worker who owes a debt to their recruiter or employer; a worker who is not free to refuse overtime; a worker who appears to be under the minimum working age; a worker who is coached or prevented from speaking during an audit; and several workers paid into a single bank account.

8 SUPPLIER DUE DILIGENCE AND SELF-ASSESSMENT

Due diligence is proportionate to the assessed risk and is completed before engagement.

- Every new supplier, contractor, labour hire provider, cleaning provider and freight provider is issued this policy and AUT-CORP-PO-CS-0002 Code of Conduct, and acceptance of both is a condition of engagement.
- The Operations Manager records, for every new supplier, the goods or services supplied, the country of manufacture or service delivery, whether labour hire or subcontracting is used, and the resulting risk rating.
- Every higher-risk supplier completes a written self-assessment before engagement and at least every two years thereafter. The self-assessment covers the supplier's own policy, its recruitment practices and fees, wages and hours, freedom of movement and document retention, its use of labour hire and subcontractors, its grievance channel, its worker accommodation where it provides any, its visibility of its own upstream suppliers, and any incident identified in the last three years.
- The HSEQ Manager evaluates each self-assessment, records the outcome, and raises a corrective action for every gap with an owner and a due date.
- A supplier that does not return a self-assessment within 20 working days is escalated to the Directors, and no new order is placed until the self-assessment is returned or the Directors record a decision to proceed and the reason.



- Higher-risk suppliers are audited at least every three years, and within 12 months of any substantiated finding. An audit may include the supplier's second tier suppliers, and the residential facilities the supplier provides to its workers, where a specific risk has been identified. Audits are normally scheduled, and proceed without prior notification where notice would defeat their purpose.
- Where an audit or interview is conducted, workers are interviewed without a supervisor present and are told that no reprisal will follow.
- Due diligence is repeated when a supplier changes ownership, changes its manufacturing site, begins using labour hire, or is the subject of a credible adverse report.

Supplier assessment is coordinated with AUT-CORP-PO-SA-0018 Contractor Management Policy so that a contractor is assessed once against safety, quality and modern slavery requirements.

9 CONTRACT REQUIREMENTS

Purchase orders, supply agreements, labour hire agreements, service agreements and subcontracts issued by AUTONOMA require the counterparty to:

- Comply with all applicable labour, employment, migration and modern slavery law, and with this policy and AUT-CORP-PO-CS-0002 Code of Conduct.
- Warrant that it does not use, and does not knowingly benefit from, modern slavery in its operations or supply chain.
- Charge no worker any recruitment fee, and repay any fee a worker has paid.
- Permit each worker to retain their own identity and travel documents.
- Provide each worker with a written contract before work starts, in a language in which the worker is proficient, and a copy of it.
- Maintain records of wages, hours, ages and right to work, and make them available to AUTONOMA on request.
- Disclose to AUTONOMA, within five working days of becoming aware, any modern slavery risk, allegation or incident in its operations or in the supply chain serving AUTONOMA.
- Permit AUTONOMA or its nominated auditor to audit, including without prior notification where notice would defeat the purpose, and including worker accommodation where a specific risk has been identified.
- Participate in and fund the remediation of any harm it has caused or contributed to, including repayment of fees and unpaid wages.
- Impose equivalent obligations on its own suppliers and subcontractors, and demonstrate on request that it has done so.
- Accept that AUTONOMA may suspend or terminate the agreement where the counterparty refuses to remediate, fails an agreed remediation plan, or conceals an incident.

Where a client contract imposes modern slavery obligations more stringent than these, the client's requirement is passed down to the relevant suppliers and the Project Manager records that it has been.

10 RECRUITMENT, LABOUR HIRE AND AUTONOMA'S OWN OPERATIONS

AUTONOMA applies the same standard to itself that it requires of its suppliers.



- No AUTONOMA worker, and no worker supplied to AUTONOMA, pays any fee to obtain or keep work. Where a fee has been paid, AUTONOMA requires the provider to repay it and verifies the repayment.
- Every worker receives a written contract or engagement letter before starting work, stating the pay, the hours, the location and the notice period, in a language in which the worker is proficient.
- Every worker retains their own identity, travel and qualification documents. AUTONOMA takes copies for right to work and competency verification and returns the originals immediately.
- Right to work and age are verified against original documents before engagement, and the verification is recorded.
- Wages and entitlements meet or exceed the applicable modern award or industrial instrument, are paid on time by traceable transfer to an account in the worker's own name, and are accompanied by a pay statement the worker can understand. No deduction is made that is not lawful and authorised in writing.
- No worker is required to lodge a bond or deposit, and no wages are withheld as a retention against departure.
- Hours of work comply with the Fair Work Act 2009 (Cth) and with AUT-CORP-PO-SA-0014 Fatigue Management Policy. Overtime is voluntary and paid at the applicable rate.
- Labour hire providers are engaged only where they hold the licence or registration required in the jurisdiction, and the Operations Manager verifies that licence before the first placement and annually thereafter.
- The Supervisor of a labour hire worker confirms in the first week that the worker knows who employs them, what they are paid, that they hold their own documents, and how to raise a concern, and records that confirmation.

11 IDENTIFYING AND RESPONDING TO AN INCIDENT

Where a worker, supplier, client or any other person identifies or suspects modern slavery, the following applies.

13. The person reports it immediately through any channel in *Grievance Channels and Access to Remedy*. A report is made on the day the concern arises and is not delayed for verification.
14. The HSEQ Manager records the report in the case record and notifies the Directors on the same day.
15. The immediate safety and wellbeing of the people affected governs every subsequent decision. No step is taken that would expose a person to retaliation, dismissal, deportation risk or loss of income without their informed consent.
16. The Directors appoint an investigator who is independent of the relationship concerned, and obtain external specialist or legal advice where the case involves a criminal offence, a visa issue or a person's immediate safety. Where a criminal offence may have occurred, the matter is referred to the Australian Federal Police on that advice.
17. Remediation is agreed with the supplier and, so far as possible, with the workers affected. It is documented as a plan with actions, owners, timeframes and verification evidence, and is approved by the Directors. Remediation typically includes repayment of recruitment fees, payment of unpaid or underpaid wages, return of withheld documents, removal of



restrictions on movement, safe alternative work or safe exit and support for the worker, and correction of the practice that caused the harm.

18. Where a child is found working, the child's welfare governs the response. The child is removed from the work and support for the child's education and family income is arranged in consultation with the child's family. The child is not simply dismissed.
19. AUTONOMA continues the relationship while the supplier is willing and able to remediate, because withdrawing usually harms the workers rather than helping them. AUTONOMA increases oversight, shortens the audit cycle and verifies each remediation action by evidence and by re-inspection.
20. AUTONOMA suspends or terminates the relationship only where the supplier refuses to remediate, fails to meet an agreed remediation plan, conceals an incident, or where the conduct is so serious that continuing is untenable. Before terminating, the Directors record the likely effect on the affected workers and the steps taken to reduce that effect, including notice to the workers where it is safe to give it.
21. The HSEQ Manager verifies closure, records the systemic change made to prevent recurrence, and reports the case and its outcome at the next management review.

12 GRIEVANCE CHANNELS AND ACCESS TO REMEDY

A concern about modern slavery may be raised by any person, including a worker in AUTONOMA's supply chain, by any of the following routes:

- To the person's Supervisor, the Operations Manager or the HSEQ Manager.
- To either Director, each of whom is an eligible recipient for the purposes of Part 9.4AAA of the Corporations Act 2001 (Cth).
- Through the AUTONOMA confidential reporting channel described in AUT-CORP-PO-CS-0002 Code of Conduct, which accepts anonymous reports.

AUTONOMA requires each higher-risk supplier to operate its own grievance channel that is accessible to its workers in a language they understand, that permits anonymous reports, and that records what was raised and what was done. The presence and use of that channel is tested in the self-assessment and in audit.

A person who raises a concern is protected from reprisal. Detrimental conduct against them is a serious breach of AUT-CORP-PO-CS-0002 Code of Conduct. Whistleblower protections under Part 9.4AAA of the Corporations Act 2001 (Cth) apply where the disclosure qualifies, and the identity of a protected discloser is not revealed without consent except as that Act permits.

Remedy is provided under the *Access to Remedy* section of AUT-CORP-PO-CS-0002 Code of Conduct. AUTONOMA does not require a person to waive any right, or to sign a confidentiality undertaking about the underlying conduct, as a condition of receiving remedy, and does not treat remedy as complete until the affected people confirm the agreed actions have been delivered or the Directors record why that confirmation could not be obtained.

13 TRAINING AND COMPETENCY

Every worker completes modern slavery awareness training during induction under AUT-CORP-PR-HR-0001 Onboarding and Training Procedure. The training covers what modern slavery is, the indicators in Table 2, and how and to whom to report.



Workers who purchase goods or services, engage labour hire or subcontractors, receive goods, manage freight, supervise labour hire workers, or manage installation and service work overseas complete targeted training before undertaking that work. The targeted training also covers the risk areas in Table 2, the self-assessment and audit process, the contract clauses required by *Contract Requirements*, how to interview a worker without creating risk for them, and the remediation-first response.

Directors and the Managing Director complete the same targeted training and additional training on approving remediation plans, deciding on suspension or termination, and answering client questionnaires accurately.

Competency is verified by written scenario-based assessment, using scenarios covering a labour hire worker who has paid a placement fee, a supplier that refuses an audit, and a client questionnaire that asks for evidence AUTONOMA does not hold. Refresher training is completed at least every two years, and additionally whenever the legislation changes, a case is recorded, or a new sourcing country or labour model is introduced. Records are held under AUT-CORP-PR-HR-0002 Skills and Development Procedure.

14 MONITORING, RECORDS AND REVIEW

Compliance with this policy is monitored through:

- Annual modern slavery risk assessment across AUTONOMA's own operations and every category of goods and services purchased, recorded in AUT-CORP-RG-SA-0005 Corporate Risk Register.
- Quarterly review by the Directors of due diligence coverage, showing the proportion of higher-risk suppliers holding a current self-assessment and the audits completed against the plan.
- Annual verification that every labour hire provider holds the licence or registration required in its jurisdiction.
- Annual confirmation by the Operations Manager that purchase orders and service agreements in use carry the clauses in *Contract Requirements*.
- Review of every case, remediation plan and remedy outcome at each management review, held at least annually, including whether the actions taken were effective.
- Internal audit against this policy at least annually under AUT-CORP-PL-SA-0001 Health, Safety, Environment and Quality Management Plan.

Each finding is raised as a corrective action with a named owner and a due date and is tracked to closure. A breach of this policy by a worker is managed under AUT-CORP-PO-CS-0001 General Policy and may result in termination. A breach by a supplier is managed under *Identifying and Responding to an Incident*. Conduct that may constitute an offence under Division 270 or Division 271 of the Criminal Code Act 1995 (Cth) is referred to the Australian Federal Police on legal advice.

Table 3: Modern slavery records and retention

Record	Held by	Retention
Signed current revision of this policy	HSEQ Manager	Current version live; superseded versions 7 years



Record	Held by	Retention
Annual modern slavery risk assessment	HSEQ Manager, in AUT-CORP-RG-SA-0005	7 years
Supplier due diligence records and risk ratings	Operations Manager	7 years after the engagement ends
Supplier self-assessments and evaluations	HSEQ Manager	7 years after the engagement ends
Supplier audit reports and corrective actions	HSEQ Manager	7 years after closure
Contract clauses and supplier acceptances of this policy	Operations Manager	7 years after the engagement ends
Labour hire provider licence verifications	Operations Manager	7 years
Right to work and age verification records	HSEQ Manager	7 years after separation
Case record, investigation records and remediation plans	Directors, confidentially	7 years after closure
Remedy records, including evidence of fees and wages repaid	Directors	7 years after closure
Client questionnaire responses and the evidence relied on	HSEQ Manager	7 years
Voluntary modern slavery statements and Director approvals	Directors	7 years
Training and competency records	HSEQ Manager	7 years after separation

This policy is reviewed annually. It is also reviewed whenever the Modern Slavery Act 2018 (Cth) or its threshold changes, AUTONOMA's revenue approaches the reporting threshold, a new sourcing country, supplier category or labour model is introduced, a case is substantiated, a client imposes a more stringent requirement, or an audit finding indicates the policy is not effective. The Directors own the review and the Managing Director approves each revision.

15 REFERENCES

15.1 Legislation and Standards

Reference	Subject
Modern Slavery Act 2018 (Cth)	Modern slavery, reporting entity threshold, statement content
Criminal Code Act 1995 (Cth), Divisions 270 and 271	Slavery, servitude, forced labour and trafficking in persons offences
Fair Work Act 2009 (Cth)	Wages, hours, entitlements, records and general protections
Equal Opportunity Act 1984 (WA)	Discrimination and harassment
Work Health and Safety Act 2020 (WA)	Duty owed to workers, including labour hire workers



Reference	Subject
Corporations Act 2001 (Cth), Part 9.4AAA	Whistleblower protection and eligible recipients
Privacy Act 1988 (Cth) and the Australian Privacy Principles	Personal information collected in due diligence and verification
Modern Slavery Act 2015 (UK)	Applies to suppliers within its scope, and is required of them by this policy
ISO 31000:2018	Risk management

15.2 AUTONOMA Documents

Document number	Title
AUT-CORP-PO-CS-0001	General Policy
AUT-CORP-PO-CS-0002	Code of Conduct
AUT-CORP-PO-CS-0004	Gifts, Meals and Entertainment Policy
AUT-CORP-PO-CS-0005	Trade Controls and Sanctions Policy
AUT-CORP-PO-EN-0001	Environmental and Sustainability Policy
AUT-CORP-PO-SA-0014	Fatigue Management Policy
AUT-CORP-PO-SA-0018	Contractor Management Policy
AUT-CORP-PL-SA-0001	Health, Safety, Environment and Quality Management Plan
AUT-CORP-PR-QA-0001	Document and Data Control Procedure
AUT-CORP-PR-SC-0001	Warehouse Goods Inwards and Outwards Procedure
AUT-CORP-PR-HR-0001	Onboarding and Training Procedure
AUT-CORP-PR-HR-0002	Skills and Development Procedure
AUT-CORP-RG-SA-0005	Corporate Risk Register

15.3 External Guidance

Reference	Subject
United Nations Universal Declaration of Human Rights and the International Bill of Human Rights	Internationally recognised human rights
United Nations Guiding Principles on Business and Human Rights	Due diligence, leverage and access to remedy
International Labour Organization Conventions, including the Forced Labour Convention and the Worst Forms of Child Labour Convention	Forced labour and child labour standards
International Labour Organization general principles and operational guidelines for fair recruitment	Ethical recruitment and the employer pays principle
OECD Guidelines for Multinational Enterprises on Responsible Business Conduct	Responsible business conduct and supply chain due diligence



Reference	Subject
Attorney-General's Department, Commonwealth Modern Slavery Act guidance for reporting entities	Risk assessment, due diligence, remediation and effectiveness
Australian Border Force, Modern Slavery Statements Register	Statements given by reporting entities
Global Slavery Index	Country-level prevalence and vulnerability information used in risk assessment
Fair Work Ombudsman, labour hire and sham contracting guidance	Labour hire obligations



APPROVAL

Prepared by	Reviewed by	Approved by
Adrian Krop Director Date: 04-Aug-2026	Adrian Krop Director Date: 04-Aug-2026	John Ha Managing Director Date: 04-Aug-2026