

## MODERN SLAVERY POLICY

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### INTRODUCTION

NZPM is opposed to all forms of unethical business behaviour. We recognise the harmful impact that modern slavery has on individuals and society and we are committed to help prevent these practices.

Modern slavery is a complex crime that takes a number of different forms including slavery, servitude, forced labour and human trafficking.

- Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment.
- Victims may be forced to work for little or no pay, and have their identification documents withheld to prevent them from leaving.
- Victims are often pressured into debt bondage and are likely to be fearful of those who exploit them.
- Victims will frequently not identify or recognise themselves as being enslaved. It is a crime that is often hidden from plain sight.
- All these factors make it very difficult for modern slavery offences to be identified and for victims of slavery to escape.

The purpose of this Policy is to ensure that the NZPM group of companies:

- is compliant with national and other applicable laws and regulations in the areas in which the businesses operate;
- sources products and services in accordance with legal obligations and community expectations while working with suppliers to improve their social practices;
- act to prevent, mitigate and where appropriate, remedy modern slavery in their supply chains.

If the policy is breached, we will act as quickly as practicable to remedy our adverse impacts on workers, individuals or communities and we will engage directly with affected stakeholders.

### POLICY

NZPM is committed to:

- Adopting policies and procedures to ensure that it is addressing modern slavery in its operations and supply chains;
- As far as practicable, include in its operational and supplier contract terms, requirements that suppliers comply with all national and other applicable laws and regulations in the areas in which they operate;

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- As far as practicable, use in its operational and supplier contract terms requirements that suppliers:
  - comply with the Minimum Standards;
  - provide NZPM with rights of termination if the supplier is unable or unwilling to work towards full compliance with the Minimum Standards.
- As far as practical, establishing systems to monitor suppliers for compliance with the Minimum Standards through supplier assessment processes, taking into account all relevant risk factors such as country risk and product risk;
- Progressively implement a risk management based reporting regime to provide visibility and assurance over compliance with the policy.

### MINIMUM STANDARDS

The minimum standards expected of suppliers is as follows:

- No forced or bonded labour
- No child labour
- Compliance with all laws regulating local wages, overtime compensation and legally mandated benefits.
- Record keeping must be accurate and transparent
- Working hours must comply with applicable local laws
- No bribery, discrimination, harassment or abuse
- Freedom of association, grievance mechanisms and recourse
- Safe and hygienic working environment that is without risk to health
- Adequate processes for subcontracting
- Migrant workers have the same entitlements as local workers
- Clear understandable labour contracts

### POLICY ADMINISTRATION

Policy Owner: Compliance Committee

Approval date: NZPM Board –April 2023.

Next review: March 2026