



MODERN SLAVERY POLICY

Version	021		
Staff Consultation:	29/07/2024	Scheduled review	March 2026
Board Approval:	29 August 2024		

INTRODUCTION

Palms Australia is committed to ensuring that modern slavery does not occur within our organisation or our supply chains.

STATEMENT OF COMMITMENT

Palms Australia has a zero-tolerance stance on acts of modern slavery and human trafficking. Palms Australia's core values and mission align with the spirit of the Modern Slavery Act 2018 (Cth)¹ and the task of eliminating modern slavery.

This policy outlines our approach to preventing, identifying, and addressing modern slavery. This will be achieved by providing all personnel with the necessary training and skills to implement this policy.

PURPOSE

The purpose of this Modern Slavery Policy is to outline Palms' commitment to preventing, identifying, and addressing modern slavery in all its forms within our operations and supply chains. This policy aims to ensure that our practices uphold the highest ethical standards and respect for human rights, protecting the dignity and well-being of all individuals involved in our activities.

The Board of Palms Australia has formally committed to the implementation of this policy and will receive updates on compliance with the policy.

CORE PRINCIPLES

The following principles inform the implementation of this policy:

- a) Palms Australia will not knowingly use or contribute to modern slavery practices in any form.
- b) Palms Australia will actively work to identify and eliminate modern slavery practices from its operations, business partnerships and supply chain.
- c) Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers² in Palms Australia's operations or supply chain is unacceptable.
- d) Palms Australia will comply with all relevant laws and regulations regarding employee recruitment, remuneration, working conditions and freedom of association.
- e) Palms Australia's final purchasing decisions will not be based on price alone. Ethical business processes are an essential part of Palms Australia's value for money and 'fit for purpose'

¹ <https://www.legislation.gov.au/C2018A00153/latest/text>

² Based on SafeWork NSW definition of worker which includes employees, contractors, sub-contractors, employees of contractors and subcontractors, employees of labour hire companies, apprentice or trainee, work experience students, outworkers and volunteers.

considerations. This includes consideration of worker living wage mechanisms and responsible recruitment of workers.

f) Palms Australia will continue to support its suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in the collective supply chains.

DEFINITIONS

Donor: An individual, group, entity, corporation, or another party who makes a financial contribution on a one off or a regular basis.

Modern Slavery: Any conduct that constitutes modern slavery under the Modern Slavery Act 2018 (Cth) (or any amendment or substitute to that Act from time to time), including slavery, servitude, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services.

Modern Slavery Act: Modern Slavery Act 2018 (Cth), as amended from time to time.

Operations: Activity undertaken by an organisation to pursue its objectives and strategy in Australia or overseas, including:

- (a) Direct employment of workers
- (b) Provision and delivery of products or services
- (c) Processing and production
- (d) Financial investments (including investments in non-managed/operated joint ventures)
- (f) Leasing of property, products and/or services
- (g) Research and development
- (h) Charitable activities
- (i) Distribution, purchasing, marketing and sales.

Partner: Any organisation which is collaborating with Palms Australia or proposes to operate a joint venture. An indication that an organisation is a partner is that they have a current MOU or Partnership Agreement with Palms.

Sponsor: A sponsor is an individual, group, entity, corporation, or another party who sponsors on a one off or a regular basis.

Supplier: Any organisation or person who supplies Palms Australia with goods or services of a value in excess of \$1000, and includes their officers, directors, subcontractors, agents, related entities, and consultants.

Supply Chains: The products and services (including labour) that contribute to an organisation's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers, and includes:

- (a) Products provided to the organisation by suppliers
- (b) Services provided by suppliers
- (c) Products and services used by indirect suppliers in the organisation's supply chains

SCOPE

This Modern Slavery Policy applies to all individuals and entities associated with Palms, including:

1. Internal and External Applicability

- Palms Australia personnel (Palms Australia employees, office volunteers, interns, associates and Palms Australia Board and committee members).

- All Palms Australia program participants
 - Visitors to our programs (including media)
 - Palms Australia partners
 - External service providers engaged by Palms Australia. This includes consultants, contractors and subcontractors.
2. **Geographical Scope:** The policy covers all Palms operations both within Australia and in any overseas locations where Palms conducts activities or sends volunteers.
3. **Operational Scope:** This policy covers:
- All programs, projects, and initiatives undertaken by Palms.
 - All aspects of the supply chains involved in the procurement of goods and services.
 - Recruitment, hiring, and employment practices.
 - Volunteer placement and management processes.
 - Partnerships, collaborations, and other working relationships with external entities.
 - All procurement processes from sourcing to contracting and purchasing.
4. **Responsibility and Accountability**
- **Management Responsibility:** The scope outlines that management at all levels is responsible for implementing and adhering to this policy.
 - **Individual Responsibility:** All individuals associated with Palms are required to understand and comply with this policy to ensure that modern slavery is not present in any aspect of our operations or supply chains.
 - **Suppliers and Partners:** All suppliers and partners must:
 - Ensure they comply with all applicable laws and regulations relating to Modern Slavery (including the Modern Slavery Act) in any jurisdiction where they operate.
 - Use best endeavours to ensure there is no demonstrated Modern Slavery in their supply chains and operations.
 - Have a process in place to enable Workers in their operations and supply chains to raise concerns about their work conditions.
 - Notify Palms Australia within 5 business days' of becoming aware of any material risk of Modern Slavery in their Operations or Supply Chains.
 - Use best endeavours to address any material risk of Modern Slavery identified and to prevent the recurrence of the conditions or circumstances which gave rise to the material risk in an effective and timely manner.

POLICY IMPLEMENTATION

Actions to prevent and manage modern slavery risk

To put this policy into practice the following actions are required of all Palms Australia employees, business partners and suppliers.

1. Anyone working for Palms Australia or on its behalf is expected to implement the following measures:
 - a. Ensuring that the identification, prevention, management and mitigation of modern slavery risk is a core responsibility of all employees.
 - b. Business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery practices are strictly forbidden.

- c. Any actual or suspected activity that could breach this policy must be reported immediately.
2. Relevant external stakeholders will be engaged to support this policy (for example suppliers, contractors, joint venture or other business partners).
3. Anti-slavery clauses are incorporated into procurement tenders and contracts over the value of \$1000 which include the right to audit, review documentation and interview workers.
4. Regular review of this Policy and its implementation will be conducted regularly to drive continuous improvement
5. Supplier reviews will be undertaken to assess levels of modern slavery risk, commitment and capacity to manage identified risks, wherever practical. This includes any new supplier that wants to do business with Palms Australia.

Training and Awareness

1. Provide mandatory training for all employees and volunteers on recognising and addressing modern slavery.
2. Develop awareness programs to educate staff, volunteers, and partners about the risks of modern slavery and the importance of prevention.

Reporting Mechanisms

If an employee or supplier of Palms Australia identifies actual or suspected modern slavery risks, they are expected to make a report. Any instance of actual or suspected modern slavery amounts to a “disclosable matter” under Palms Australia’s Whistleblower Policy.

Concerns or suspicions of modern slavery can be reported confidentially through our established reporting mechanisms. We protect whistleblowers from retaliation.

Remediation Processes

1. Develop and implement clear protocols for responding to incidents of modern slavery.
2. Provide appropriate support and assistance to victims of modern slavery identified through Palms Australia’s activities.

Collaboration and Partnerships

1. Collaborate with organisations and experts specialising in combating modern slavery to enhance our strategies and actions.
2. Engage with stakeholders, including donors, partners, and local communities, to raise awareness and support efforts to combat modern slavery.

Monitoring and Evaluation

1. Conduct regular reviews of the effectiveness of actions taken to prevent and manage modern slavery risks.
2. Implement a continuous improvement approach, updating policies and practices based on findings from assessments and audits.

Breaches

Any breaches of this policy may lead to disciplinary action. Depending on the severity of the breach, such disciplinary action against:

- Palms Australian workers may include reprimand, formal warning, demotion, stand down, suspension, or termination.

- Suppliers, partners, or other parties may include suspension, or termination, including of any agreement.

Breaches of applicable laws or regulations may also result in prosecution by the appropriate authorities.

POLICY REVIEW

This policy will be reviewed from time to time or as legislation is amended, considering current good practice and applicable regulatory advice.

We conduct regular risk assessments to identify potential modern slavery risks and implement due diligence processes to mitigate these risks.

RELATED POLICIES AND DOCUMENTS

Palms Australia Procurement Policy and Procedures

Palms Australia Board Fundraising Policy

Palms Australia Complaint Management Policy

Palms Australia Whistleblower Policy

RELATED LEGISLATION/ STANDARDS

Modern Slavery Act 2018 (Cth) and International Labour Organisation (ILO) conventions³.

VERSION CONTROL

Version	Purpose/ Change	Author	Date
01	New policy	Jen Wiggins	29/07/2024
02	Board approved	Soraya Kassim	4/9/2024

³ <https://www.ilo.org/international-labour-standards/conventions-protocols-and-recommendations>