

Modern Slavery Policy and Procedures

Evolving Workshop Technologies Pty Ltd
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Document Control

1. Introduction

1.1 Purpose

This Modern Slavery Policy outlines Evolving Workshop Technologies Pty Ltd's (EWT) commitment to preventing modern slavery and human trafficking in our operations and supply chains. This policy is designed to be practical and proportionate to our small business size (fewer than 4 employees) while meeting customer requirements and demonstrating our commitment to ethical business practices.

1.2 Scope

This policy applies to:

- All employees and contractors engaged by EWT
- All suppliers and business partners
- All operations conducted by EWT within Australia
- All procurement activities

1.3 Company Context

EWT is a small Australian manufacturing business operating primarily in Howard Springs, NT and Brisbane, Queensland. We design, manufacture, and supply elevating work platforms for service pits. Our operations are mainly domestic within Australia, with some components sourced from Australian and international suppliers.

2. Our Commitment

2.1 Zero Tolerance Statement

EWT has zero tolerance for modern slavery and human trafficking. We commit to:

Version Date Approved By Review Date

1.0 March 2026 Managing Director March 2027

- Acting ethically and with integrity in all business dealings
- Understanding modern slavery risks in our supply chain
- Taking appropriate action when concerns are identified
- Complying with Australian laws and customer requirements
- Working with suppliers who share our values

2.2 What is Modern Slavery?

Modern slavery includes:

1. Forced labour - Work extracted through threats or coercion
2. Debt bondage - Workers trapped by debt obligations
3. Human trafficking - Movement of people for exploitation
4. Child labour - Exploitation of children through hazardous work
5. Deceptive recruiting - Misleading workers about employment conditions

2.3 Our Standards

We require that all workers in our operations and supply chain:

- Are of legal working age
- Work voluntarily (no forced labour)
- Are paid fairly (at least minimum legal wages)
- Have written employment contracts they understand
- Are not charged recruitment fees
- Can resign without penalty upon giving reasonable notice
- Work in safe conditions

3. Responsibility

3.1 Managing Director

The Managing Director (Hew McDonald) is responsible for:

- Approving and implementing this policy
- Making final decisions on supplier relationships
- Ensuring the business operates ethically
- Reviewing this policy annually

3.2 All Employees

All employees are responsible for:

- Understanding this policy
- Raising concerns about potential modern slavery
- Treating suppliers and workers with respect
- Following procedures when engaging suppliers

4. Understanding Our Risks

4.1 Our Operations

Risk Level: LOW

EWT directly employs fewer than 4 employees in Australia. We:

- Comply with Australian employment laws
- Provide written employment contracts
- Pay wages in accordance with Fair Work requirements
- Maintain safe working conditions
- Do not use labour hire agencies or migrant workers

4.2 Our Supply Chain

We have identified the following suppliers and assessed their modern slavery risk:

Supplier Product/Service Location Risk

Certex Lifting Support ropes Geelong, VIC Low

Richmond Rolling Sheaves Dandenong, VIC Low

Signal to Noise Radio remotes Germany Low

Tensile Design Rope fittings NSW (source: Vietnam) Medium

Coltech Planning Mechanical engineering Darwin, NT Low

Miami Stainless Lifting eye bolts QLD (source: China) Medium

Table 1: EWT Supply Chain Risk Assessment

Higher Risk Categories:

- Rope fittings manufactured in Vietnam
- Lifting eye bolts manufactured in China

These require additional attention due to manufacturing location.

5. Supplier Management

5.1 Choosing Suppliers

When selecting a new supplier, we:

1. Ask questions about their labour practices
2. Check their reputation through references and online research
3. Request information about where products are made
4. Prioritize Australian suppliers where practical
5. Include modern slavery clauses in contracts or purchase orders

5.2 Supplier Questionnaire

For new suppliers or higher-risk suppliers, we ask:

- Do you have a modern slavery or ethical sourcing policy?
- Where are your products manufactured?
- Do you comply with local labour laws?
- Do you use labour hire agencies or migrant workers?
- Have you been investigated for labour violations?
- Can we visit your facility if needed?

5.3 Ongoing Relationships

We maintain good relationships with suppliers by:

- Communicating our expectations clearly
- Discussing any concerns openly
- Reviewing supplier performance regularly
- Responding to any issues promptly

5.4 If We Identify a Problem

If we discover or suspect modern slavery in our supply chain:

Immediate Actions:

1. Stop placing new orders
2. Document the concern
3. Contact the supplier to discuss the issue

Next Steps:

- If the supplier is willing to fix the problem, we give them a reasonable timeframe and monitor progress
- If the supplier refuses to address the issue or the violation is severe, we end the relationship
- If we identify victims, we ensure their safety and consider reporting to authorities

6. Contract Requirements

6.1 Standard Contract Clause

All supplier contracts and purchase orders include:

"The Supplier confirms that it complies with all applicable labour laws and does not engage in forced labour, child labour, or human trafficking. The Supplier must notify EWT immediately of any modern slavery concerns in its supply chain. EWT may terminate this agreement if the Supplier breaches these requirements."

7. Training and Awareness

7.1 Employee Training

Given our small team size:

- The Managing Director completes modern slavery awareness training annually
- All employees receive a copy of this policy and discuss it during team meetings
- When hiring new employees, modern slavery expectations are covered during induction
- This policy is kept accessible for all employees to reference

7.2 Supplier Communication

We share our expectations with suppliers by:

- Providing this policy to key suppliers
- Discussing modern slavery requirements during supplier meetings
- Including requirements in tender documents and contracts

8. Raising Concerns

8.1 How to Report

If you see or suspect modern slavery, report it to:

Managing Director

Hew McDonald

Phone: +61 428 844 225

Email: hew@ewtplatform.com

Or mail confidentially to:

PO Box 65, Howard Springs NT 0835

(Mark envelope "Confidential - Modern Slavery")

8.2 What Happens Next

When a concern is reported:

1. We acknowledge the report within 2 business days
2. We investigate the concern (usually within 14 days)
3. We take appropriate action based on findings
4. We protect anyone who reports concerns from retaliation

8.3 No Retaliation

EWT will not tolerate retaliation against anyone who reports a concern in good faith. This includes dismissal, demotion, harassment, or any adverse treatment.

9. Measuring Our Performance

9.1 What We Track

We keep simple records of:

- Supplier assessments completed
- Any concerns raised and how they were addressed
- Training completed by employees
- Updates to our supplier list

9.2 Annual Review

Each year, the Managing Director reviews:

- Whether this policy is working effectively
- Changes to our supplier base
- Any issues identified during the year
- Whether improvements are needed

10. Legal Compliance

10.1 Australian Laws

We comply with:

- Australian Modern Slavery Act 2018 (Cth) principles
- Fair Work Act 2009 (Cth)
- Work Health and Safety Act 2011 (Cth)
- All other applicable Australian employment and business laws

10.2 Our Record

EWT confirms:

- We have not been investigated or convicted of any modern slavery or labour law violations
- We operate in accordance with Australian law
- We are committed to maintaining ethical business practices

11. Record Keeping

11.1 Records We Maintain

For our small business, we keep:

Employee Records:

- Employment contracts
- Payroll records
- Training records

Supplier Records:

- Supplier contact information and contracts
- Supplier assessments or questionnaires (for higher-risk suppliers)
- Any correspondence about modern slavery concerns

Policy Records:

- This policy document and any updates
- Annual review notes

11.2 How Long We Keep Records

- Employee records: 7 years after employment ends
- Supplier records: Duration of relationship plus 7 years
- Policy documents: Kept permanently

12. Policy Review

12.1 When We Review

This policy is reviewed:

- At least once per year
- When our business changes significantly
- After any modern slavery incident
- When customer requirements change

12.2 Approval

Policy updates are approved by the Managing Director.

13. Contact Information

For questions or concerns about this policy:

Hew McDonald, Managing Director
Evolving Workshop Technologies Pty Ltd
PO Box 65, Howard Springs NT 0835
Phone: +61 428 844 225
Email: hew@ewtplatform.com

14. Policy Approval

This Quality Management Plan has been reviewed and approved for implementation on all EWT projects.

Hew Cosmo McDonald

Managing Director
Evolving Workshop Technologies Pty Ltd

Date: 1st January 2026

