

# Modern Slavery Grievance Resolution Procedure

# Modern Slavery Grievance Policy & Procedure

## Purpose

Wotton + Kearney Pty Ltd (ABN 94 632 932 131) ("W+K") is committed to respecting human rights and preventing modern slavery. We recognise that modern slavery is a serious human rights violation and therefore we have adopted this policy to make it easy for anyone to raise concerns about any potential or actual modern slavery within our operations or supply chains.

This policy sets out a process for W+K staff and for third parties to raise concerns about modern slavery and ensures that all concerns or grievances are taken seriously and resolved promptly.

## What is Modern Slavery?

Modern slavery is used as an umbrella term to draw attention to the systematic abuse of fundamental human rights in contemporary workforces. It does not have a set definition in law. It is generally accepted as covering eight types of serious exploitation:

- human trafficking
- slavery
- forced labour
- debt bondage
- servitude
- forced marriage
- deceptive recruitment; and
- the worst forms of child labour.

It refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.

## How to Lodge a Modern Slavery Grievance

If you believe that you or someone else has been subjected to modern slavery at W+K or by our suppliers, we encourage you to raise your concerns. There are a number of options open to you and you should choose the option with which you are most comfortable. Modern slavery grievances can be made anonymously.

When you lodge your concern, please provide as much information as possible about your concern of modern slavery practices. This could include:

- the identity of the people or companies responsible, the parties impacted, the events or practices that are giving rise to the suspicion of modern slavery, and the date or period when those events or practices occurred
- any supporting evidence
- your contact details (for grievances that are not anonymous).

It would be helpful if this concern is put in writing.

## Option 1: Lodge a Grievance in writing with W+K's Modern Slavery Grievance Team

You can lodge a grievance anonymously using the form available [here](#).

You can also lodge a grievance in writing by letter or via email at [modernslaverygrievances@wottonkearney.com.au](mailto:modernslaverygrievances@wottonkearney.com.au).

The grievance will be sent to the W+K's Head of Responsible Business, People + Culture Director and Risk Counsel.

## Option 2: Request a face-to-face meeting

If you do not feel comfortable with a written concern, you may request a face-to-face meeting with the People + Culture Director to raise your grievance. You can request a meeting by email at [info@wottonkearney.com.au](mailto:info@wottonkearney.com.au) or by using the form at <https://www.wottonkearney.com.au/locations/>.

## Investigation of Modern Slavery Grievances

All grievances raised under this policy will be taken seriously and investigated. Investigations will be conducted impartially and objectively with the aim of establishing the facts of the matter and identifying any remedial actions that may be taken.

The person conducting the investigation is known as the investigator. The person appointed to this role may vary depending on the nature of the grievance and the identity of the person / entity against whom the concern has been made. The investigator will deal with your grievance on the facts presented and may contact you if they require any additional information.

The investigation may involve:

- speaking with the relevant suppliers or third parties
- interviewing relevant witnesses
- collecting and examining relevant documents
- where possible and if appropriate to the investigation, encourage the supplier to engage directly with the party who lodged the grievance and any other parties adversely impacted.

Where W+K is the subject of a grievance, W+K may engage an independent party to investigate the grievance.

## Internal Resolution

The concern will be investigated, and based on the outcome of this investigation, the investigator may:

- reject the grievance and provide reasons for this rejection; or
- find the grievance is substantiated and suggest an appropriate remedy.

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## Remedy

Remedy for human rights harm includes:

- the process of providing a solution for human rights issues; and
- the actual results that can fix the problem.

Remedy can involve various actions like helping people access healthcare, legal aid, or psychological support, bringing them back to their home countries, compensating them financially, and taking steps to prevent similar harm in the future. Remedies are not one size fits all. A remedy will depend on listening to the individual who have experienced the human rights violation.

## Remediation

Remediation involves responding to individuals that have been harmed and preventing and mitigating potential harms.

W+K will collaborate with relevant stakeholders, including a third party (where the harm has been caused by a supplier or third party), to devise an appropriate remediation plan. All remediation plans will include but are not limited to:

- actions needed to remediate the harm caused both to the party who raised the grievance and to any other rights holders;
- actions to prevent or mitigate adverse modern slavery impact in the future; and
- a schedule for monitoring the implementation of the plan.

If a third party is involved and appears unwilling or unable to develop and adequately implement the proposed remedy, W+K may consider taking steps to:

- suspend or terminate the supplier / third party contracts / agreements / relationships / investments;
- collaborate with other entities to use leverage to lead the third party towards taking action.

In this situation, W+K will prioritise protecting the worker to ensure they are not disadvantaged by the breakdown in the supplier relationship and will engage third parties (such as civil society or law enforcement) to support where possible.

## Reporting Feedback

Updates will be provided to the individual or individuals who raised concerns at agreed intervals as to actions taken or planned as a result of the investigation.

## External Intervention

If you are not comfortable raising a concern through the Internal Grievance Procedure or you have done so and are not satisfied with the outcome of the internal grievance resolution process, you may wish to lodge a concern with an external body to act on your behalf such as the Australian Human Rights Commission.

## Reporting

W+K will regularly report to W+K's Head of Responsible Business and Executive Team:

- the number of reported grievances reviewed;
- whether the grievances were internally reported or reported by a third party;
- the outcome of the investigation; and
- where applicable, the remediation provided as a result of the grievance.

W+K will keep a grievance register to track grievances, process procedures and outcomes. This includes an annual review of grievance data to analyse internal processes and review modern slavery prevention and mitigation strategies.

Consideration will be given on how to engage procurement teams, human resources, staff and suppliers to ensure that lessons learned are implemented across business activities.

## Training

W+K will provide training to its staff on how to recognise and report concerns of modern slavery practices.

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[www.wottonkearney.com.au](http://www.wottonkearney.com.au)



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