

MODERN SLAVERY POLICY

Transport & Charter Operations – Australia

Zero-Tolerance Commitment to Ethical & Lawful Operations

Document Status	Client-Facing Policy
Applies To	All Employees, Contractors, Subcontractors & Suppliers
Review Cycle	Annual (or as required)
Legislative Basis	Modern Slavery Act 2018 (Cth) Criminal Code Act 1995 (Cth) Fair Work Act 2009 (Cth)

1. Purpose

This policy establishes the commitment of Sydney Charter Bus Pty Ltd ("the Company") to identify, prevent and address risks of modern slavery within its operations and supply chains across all transport and charter activities in Australia.

Zero-Tolerance Statement

The Company adopts a zero-tolerance approach to modern slavery and is committed to ethical, lawful and transparent business practices across all areas of operation.

2. Scope

This policy applies to all persons engaged by or with the Company, including:

Category	Covered Persons
Workforce	All employees (full-time, part-time and casual)
Operations	Bus and coach drivers, including subcontractors
Depot & Maintenance	Depot, cleaning, yard staff, mechanics and maintenance personnel
Corporate	Office staff and management
Supply Chain	Suppliers, contractors, subcontractors and third-party providers

3. Legislative Framework

This policy aligns with the following applicable Australian legislation:

Applicable Legislation

- Modern Slavery Act 2018 (Cth)
- Criminal Code Act 1995 (Cth) – Divisions 270 & 271
- Fair Work Act 2009 (Cth)
- Applicable state and Commonwealth regulations

4. Definition of Modern Slavery

Modern slavery refers to serious exploitation where individuals cannot leave or refuse work due to coercion, threats or deception. It encompasses the following forms:

Form	Description
Human Trafficking	Recruitment, transportation or harbouring of persons by coercion or deception for exploitation
Forced Labour	Work or services extracted under threat, force or coercion where the individual cannot refuse
Debt Bondage	Control of a person through a real or purported debt used to compel labour
Servitude	A condition of dependency in which a person is compelled to remain and provide services
Child Labour	Exploitation of children below legal working age or in hazardous conditions
Forced Marriage	Marriage entered into without free and full consent of both parties

5. Policy Statement

The Company makes the following firm commitments:

Company Commitments

- Prohibits all forms of modern slavery and exploitation
- Will not knowingly engage with suppliers or contractors involved in unethical labour practices
- Maintains lawful employment practices across all operations
- Actively identifies and mitigates modern slavery risks throughout its supply chains

6. Recognised Risk Areas in Transport Operations

The following operational areas present elevated modern slavery risk and are subject to heightened monitoring:

Risk Area	Examples & Context
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Subcontracted Drivers & Labour Hire	Informal cash arrangements, coercive recruitment, undocumented workers
Depot Cleaning & Yard Services	Third-party labour hire, restricted worker movement, lack of payslips
Vehicle Maintenance & Supply Chains	Non-compliant suppliers, untraceable or unusually cheap parts
Uniforms, Parts & Imported Goods	Offshore supply chains with low transparency or traceability
Temporary or Migrant Labour	Visa dependency, debt bondage, language barriers reducing ability to report

7. Responsibilities

Management

- Enforce this policy across all operations
- Conduct regular risk assessments
- Ensure compliance across all workforce and supply chain categories

All Employees & Contractors

- Comply with all lawful workplace practices
- Report any suspected risks or breaches immediately

Administration & Procurement

- Undertake thorough supplier due diligence prior to engagement
- Maintain accurate compliance records and declarations

8. Role-Specific Obligations & Controls

The Company applies targeted obligations across all workforce categories to address varying risk exposures:

ROLE / GROUP	KEY OBLIGATIONS	RISK INDICATORS
Bus Drivers (Employees & Subcontractors)	Lawful engagement under Australian law No coercion or unlawful deductions Mandatory reporting of suspicious situations Valid ABN, insurance & compliance docs (subcontractors)	Excessive working hours Informal or cash payments Signs of coercion or dependency
Depot Staff	Engagement through compliant labour hire Fair wages and safe working conditions Labour hire provider verification	Restricted communication Third-party worker control Absence of payslips or documentation
Mechanics & Maintenance	Lawful employment or contractor engagement	Untraceable or unusually cheap parts

	Ethical sourcing of parts and services Supplier due diligence required	Non-compliant or opaque suppliers
Office Staff	Supplier vetting and compliance checks Contractual enforcement of ethical standards Procurement risk monitoring	Missing supplier documentation Refusal to provide compliance assurances
Subcontractors & Third Parties	Compliance with Australian laws Written policy acknowledgment required Provide ABN, insurance & employment evidence	Non-disclosure of labour arrangements Unverifiable worker provenance

9. Due Diligence & Risk Management

The Company undertakes the following due diligence measures:

Activity	Detail
Pre-Engagement Assessment	All suppliers assessed prior to onboarding for compliance and ethical standards
Compliance Declarations	Written compliance declarations required from all suppliers and contractors
Ongoing Monitoring	High-risk suppliers subject to ongoing monitoring and periodic review
Corrective Action	Identified risks trigger immediate investigation and remediation action
Audit Rights	The Company reserves the right to audit any supplier or contractor

10. Reporting & Whistleblower Protection

Legal Obligation to Report

All personnel are required to report suspected modern slavery risks. Failure to report may constitute a breach of this policy and applicable law.

The Company provides the following reporting protections and mechanisms:

Protection	Detail
Confidential Reporting	Confidential reporting channels are available to all personnel
Anti-Retaliation	The Company strictly prohibits any form of retaliation against good-faith reporters
Investigation Commitment	All reports are investigated thoroughly and in a timely manner

11. Enforcement & Zero-Tolerance

Breach Consequences

- Immediate formal investigation
- Disciplinary action (up to and including termination of employment or contract)
- Referral to regulatory and law enforcement authorities where required
- Suspension of supplier or contractor engagement pending investigation

12. Training & Awareness

The Company will provide training and awareness to relevant personnel, including:

- Procurement staff and management on their obligations under this policy
- Operational staff on identifying and reporting risk indicators
- Ongoing updates to reflect changes in legislation and best practice

13. Modern Slavery Statement

Annual Reporting Obligation (where required)

Where the Company meets the reporting threshold under the Modern Slavery Act 2018 (Cth), an annual Modern Slavery Statement will be published addressing:

- Operations and supply chains
- Identified risks and due diligence actions taken
- Effectiveness of risk management measures

14. Monitoring, Auditing & Continuous Improvement

Activity	Approach
Internal Monitoring	Regular review of workforce practices, hours, wages and conditions with auditable records
Supplier Auditing	Right to audit high-risk suppliers; verification of labour practices; corrective actions enforced
Risk-Based Focus	Priority on labour hire, cleaning/depot services, offshore supply chains and new suppliers
Annual Policy Review	Policy updated annually, incorporating legislative changes and stakeholder feedback
Effectiveness Measurement	Assessed via risk reduction metrics, supplier compliance rates, incident reports and audit results
Governance	Senior management oversight of all compliance and enforcement activities

15. Integration with Company Policies

This policy must be read in conjunction with the following Company documents:

- Driver Code of Conduct
- Workplace Health & Safety (WHS) Policies
- Procurement Policies
- Contractor Agreements

16. Review & Contact

Review Frequency	Annually or as required by legislative or operational changes
Reporting / Enquiries	Sydney Charter Bus Pty Ltd – email: info@sydneycharterbus.com.au
Policy Owner	Colin Christian (Operations Manager)
Effective Date	1 st January 2026

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