

# Modern Slavery Policy

Rhinomed Limited  
ACN 107 903 159

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# Diversity Policy

Date adopted by the Board 17 March 2022

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## 1. Purpose

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For the purposes of this Policy, "we", "our" or "us" refers to Rhinomed Limited ACN 107 903 159 and its related entities (**Rhinomed Group**).

This Policy affirms our commitment to contribute to the broader global movement of eradicating all forms of Modern Slavery, and outlines our approach to reducing the risk of Modern Slavery practices within our supply chains and operations.

It is consistent with our principles and values, which are based on high ethical standards, including compliance with applicable laws, contractual and other obligations. It is also consistent with our broader principles concerning human rights, health and safety, anti-discrimination and equal opportunity.

This Policy also supports the intent of international conventions, treaties and protocols relevant to combatting Modern Slavery, as well as the *Modern Slavery Act (Cth)* 2018 in Australia, its respective regulations and codes from time to time (**Modern Slavery Legislation**).

## 2. Context

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Modern Slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. In 2016, it was reported that there were an estimated 40.3 million victims of modern slavery globally<sup>1</sup>.

Acknowledging, Rhinomed is committed to implementing controls to ensure its own supply chains and operations do not contribute to Modern Slavery practices, and to take appropriate action if such issues arise.

## 3. Scope

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This Policy applies to directors, officers, employees and contractors of all entities within the Rhinomed Group (Rhinomed Representatives). This Policy provides guidance on the steps we take to reduce the risk of Modern Slavery occurring in our supply chain and operations, and our expectations of all Rhinomed Representatives in supporting our efforts to reduce Modern Slavery risks. It also sets out the range of available support

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<sup>1</sup> Global Slavery Index, 2018. <https://www.globalslaveryindex.org/2018/findings/global-findings/>

avenues available to a Rhinomed Representatives if they become aware that someone is at risk of, or affected by Modern Slavery.

## 4. What is Modern Slavery

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"**Modern Slavery**" has the same meaning as in the Modern Slavery Legislation, which includes, among other things, any activity, practice or conduct that would constitute an offence in relation to slavery, forced labour, involuntary servitude, debt bondage, human trafficking, and other slavey-like exploitation as prohibited under all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time.

Included below is a non-exhaustive summary of the types of activities that would constitute Modern Slavery:

**trafficking in persons:** the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power and the like for the purposes of exploitation. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;

**slavery:** where the offender exercises powers of ownership over the victim;

**servitude:** where the victim's personal freedom is significantly restricted;

**forced labour:** where the victim is either not free to stop working or not free to leave work;

**forced marriage:** coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;

**debt bondage:** where the victim's services are pledged as security for a debt and the debt is excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;

**bribery:** a corrupt practice where an entity offers something of value to someone or a corporation in exchange for their operation in influencing a decision-making process, committing or allowing criminal activity to occur, or otherwise violating their representatives.

**the worst forms of child labour:** which involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and

**deceptive recruiting for labour or services:** where the victim is deceived about whether they will be exploited through a type of modern slavery.

All of these practices deprive individuals of their liberty in order to exploit them for commercial or personal gain.

## 5. Our approach to limiting the risk of modern slavery practices

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The Rhinomed Group will work proactively to reduce Modern Slavery within our supply chains and operations and we expect all organisations we engage with to do the same. Rhinomed Representatives are expected to understand the requirements set out below and to engage with suppliers accordingly.

### 5.1 Supply chains

For the purposes of this Policy, "**Suppliers**" is defined as any organisation or person who provides any member of the Rhinomed Group with goods or services, including their subcontractors, agents, related entities and consultants.

We expect all existing and new Suppliers to comply with the Modern Slavery Legislation and it is an expectation that all Suppliers operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced or procured, or services are performed.

Suppliers must use their best endeavours to ensure that there is no Modern Slavery in their supply chains and operations. If there is potential risk of Modern Slavery in their supply chain or operations, they must take practical or effective steps to address that occurrence or risk. Suppliers are expected to implement a course of action as soon as practicable.

Rhinomed Representatives must ensure that they are aware of the above expectations imposed on Suppliers and ensure that any contract entered into with a Supplier includes such requirements.

### 5.2 Operations and due diligence

Rhinomed adopts a number of processes and procedures to assess and identify the part of our business most at risk of Modern Slavery to then place a particular focus on those areas.

When existing policies undergo review and new policies are being developed, Rhinomed Representatives will be required to:

1. Identify where existing Modern Slavery commitments can be enhanced; and
2. Incorporate new Modern Slavery protections as required.

Rhinomed will not continue to partner with Suppliers or begin partnership with prospective partners Rhinomed know are deliberately engaging in activities running counter to the elimination of Modern Slavery.

Rhinomed Representatives must ensure that they consider this and notify their relevant manager of any issue immediately once they become aware of it.

### 5.3 Communications and training

Rhinomed Representatives will be provided with communications and training opportunities from time to time to enhance their understanding of the causes and humanitarian impact of Modern Slavery, and our approach to limiting the risk of Modern Slavery within our supply chains and operations.

### 5.4 Continuous Improvement

Rhinomed applies a continuous improvement approach to how we reduce the risk of Modern Slavery practices within our supply chains and operations.

We take into account feedback from Rhinomed Representatives and external stakeholders, as well as implementing evidence-based approaches from other organisations' successes. Rhinomed then reviews the feedback and evaluates different approaches against our own to incorporate and adapt our policies where applicable.

If required under the *Modern Slavery Act (Cth) 2018*, we will publish a *Modern Slavery Statement* that outlines the steps we have taken over the previous financial year to identify where our supply chains and operations may be contributing to Modern Slavery practices, and the actions we have taken to minimise these risks, in accordance with that Act.

## 6. Reporting Concerns of Modern Slavery

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There is a range of support available to Rhinomed Representatives if they become aware that someone is at risk. First and foremost, it is important to respond in a way that is safe, ethical and respects the dignity and rights of the person(s) at risk or affected by Modern Slavery.

Concerns regarding Modern Slavery practices, issues, risks or incidents must be raised with the Rhinomed Representatives' direct manager. That manager must then report to their divisional executive, with actions and resolutions formerly reported to the Chief Executive Officer of the particular Rhinomed entity.

## 7. Relevant Legislation in Australia

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Name	Location / Link	Document Type
Modern Slavery Act (Cth) 2018	<a href="https://www.legislation.gov.au/Details/C2018A00153">https://www.legislation.gov.au/Details/C2018A00153</a>	Online Act

## 8. Regular Review

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This policy will be reviewed annually.