



1. PURPOSE AND SCOPE

1.1. Introduction

Service Stream Limited (ABN 46 072 369 870) (**Service Stream, we, our**) is committed to the protection of human rights by maintaining a culture of ethical business conduct and compliance.

The purpose of this Modern Slavery policy (**Policy**) is to:

- provide a framework for Service Stream to minimise the risk of Modern Slavery (as defined in section 1.3 below) occurring in its operations and supply chain;
- set out the responsibilities of Service Stream, its officers, employees, contractors, consultants and suppliers to proactively address the risks of Modern Slavery in its business operations; and
- encourage the reporting of actual, suspected or anticipated cases of Modern Slavery.

1.2. Who does this policy apply to?

The expectations contained in this Policy apply to all officers, employees, contractors, consultants and suppliers of Service Stream.

Suppliers are expected to comply with sections 2.2 and 3 of this Policy.

This Policy is not intended to be contractually binding and does not form part of any employment contract or contract of engagement with Service Stream.

1.3. What is Modern Slavery?

For the purpose of this Policy, Modern Slavery is defined by the following eight types of serious exploitation as described in the *Criminal Code Act 1995* (Cth) (**Criminal Code**):

- trafficking in persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; and
- the worst forms of child labour.

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This definition may change on amendment of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) or Criminal Code, and any other law or regulation, as applicable (together, **Modern Slavery Laws**). In the event of any inconsistency, the definitions in the legislation take precedence over this Policy.

1.4. Commitment to addressing Modern Slavery

Service Stream is committed to contributing to the eradication of all forms of modern slavery.

We expect our Suppliers and members of their supply chain to share these views and operate with the highest degree of integrity and in compliance with all applicable Modern Slavery Laws.

Service Stream is committed to the following principles:

- Service Stream does not tolerate Modern Slavery or other human rights abuses in its business operations nor within or along its supply chains.
- All employment at Service Stream must be contracted voluntarily and is never the subject of threats, coercion or exploitation.
- Any allegations of Modern Slavery or other human rights violations will be treated seriously and investigated with due care and diligence, as appropriate in the circumstances.

As stipulated in our Code of Conduct, Service Stream is committed to ensuring that its officers and employees behave in a manner that enhances trust and confidence with our customers and in compliance with all applicable laws and regulations.

2. RESPONSIBILITIES

2.1. Service Stream officers, employees, contractors and consultants

Each officer, employee, contractor and consultant of Service Stream is responsible for ensuring that they:

- read, understand and comply with this Policy at all times;
- comply with all applicable Modern Slavery Laws;
- avoid engaging in any act or omission that might result in a breach of this Policy;
- complete any associated training; and
- report any concerns in accordance with this Policy.



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2.2. Suppliers

Service Stream expects suppliers to:

- read, understand and comply with this Policy at all times;
- comply with all applicable Modern Slavery Laws;
- not use or contribute to any form of Modern Slavery, including forced, bonded, or involuntary labour, or the worst forms of child labour;
- not engage in deceptive recruiting, trafficking, debt bondage, or require workers to pay recruitment fees;
- ensure all work is voluntary and that workers are free to leave employment after reasonable notice;
- respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment;
- comply with all relevant laws regarding minimum age for employment and not employ minors in hazardous or harmful work;
- provide fair wages and benefits in accordance with all applicable laws;
- maintain accurate and transparent business record keeping;
- maintain a safe, healthy and hygienic working environment;
- provide an equal opportunity workplace that is non-discriminatory, diverse, inclusive and respectful, and is free from harassment and abuse;
- where sub-contracting is allowed, implement robust procedures to effectively oversee sub-contracting arrangements and ensure sub-contractors comply with this Policy;
- assist with any reasonable requests by Service Stream for assistance or information as required to enable its own compliance under applicable Modern Slavery Laws; and
- promptly notify Service Stream of any actual or suspected breaches of Modern Slavery Laws or this Policy.

The minimum standards in this Policy are not intended to alter or override suppliers' legal, regulatory and contractual obligations and suppliers' contracts may contain obligations or requirements that are not set out in, or are additional to, this Policy.

Service Stream also expects its suppliers will communicate this Policy to their own suppliers, subcontractors and related entities who contribute to or support it, in supplying goods or services to Service Streams, so they too can comply with this Policy.

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3. REPORTING CONCERNS

3.1. What to report?

If you become aware of any actual, suspected or anticipated breaches of Modern Slavery Laws within Service Stream's business or supply chains, or the business or supply chains of a supplier (as applicable), you should notify Service Stream as soon as practicable.

Service Stream seeks to identify and address potential wrongdoing as early as possible to maintain a culture where people feel safe and protected to speak up.

3.2. Internal reporting

There are various reporting channels that are open to individuals to report any concerns or suspected breaches of Modern Slavery Laws.

All officers, employees, contractors, consultants and suppliers of Service Stream are encouraged to promptly report any actual or suspected instances of Modern Slavery via Service Stream's confidential and anonymous Whistleblower mechanism – **Stopline** - at 1300 30 45 50 or <https://servicestream.stoplinereport.com/>.

For more details on the reporting procedure for Stopline, refer to Service Stream's Whistleblower Policy.

Reports will be investigated promptly, and appropriate action will be taken in accordance with Australian law.

3.3. External reporting

In certain circumstances, it may be appropriate to report Modern Slavery concerns to an external body, including but not limited to:

- the **Australian Human Rights Commission** - investigates and conciliates discrimination and human rights breaches. Stakeholders can contact the Australian Human Rights Commission's National Information Service by phone on 1300 656 419 or by email to infoservice@humanrights.gov.au; and
- the **Australian Federal Police** - is responsible for investigating suspected cases of Modern Slavery and can be contacted on 131 237 to discuss or report a suspected case, or through the [Human trafficking, slavery and slavery-like practices \(including forced marriage\) information report online form](#). Contact can be made anonymously.

4. BREACH OF THIS POLICY

A breach of this Policy may result in termination of the employment or business relationship with Service Stream, and where applicable, Service Stream may report supplier conduct to relevant authorities. Where Service Stream determines that a supplier has breached this Policy, Service Stream may require the supplier

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to implement a remediation plan, or, in certain circumstances, suspend or terminate the relationship with the supplier in its sole discretion.

5. POLICY REVIEW AND AMENDMENTS

This Policy will be reviewed periodically, and Service Stream reserves the right to revise, modify, delete or add to this Policy from time to time, at its discretion. Material changes will be approved by the Board.

6. OTHER RELEVANT POLICIES

This Policy should be considered in conjunction with:

- Code of Conduct
- Whistleblower Policy

7. CONTACT

For questions regarding this Policy, please contact the Company Secretary (companysecretary@servicestream.com.au).