

Modern slavery policy

Summary

This document, entitled Modern Slavery Policy (MSA Policy), sets out the policy of PBS Property Group Pty Ltd (referred to as “PBS”, “we,” “our,” or “us”) on mitigating the risks that slavery, human trafficking, and related forms of serious worker exploitation do not exist in the our current or future local, national, or global business operations or supply chains.

What is the company’s commitment to ensuring that modern slavery practices do not exist in its business operations or supply chains?

Modern slavery is a serious crime and a violation of fundamental human rights. “Modern slavery” is an umbrella term that refers to various practices, such as slavery, servitude, forced and compulsory labor, human trafficking, and the worst forms of child labor. PBS is committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing and enforcing robust systems and controls to ensure modern slavery is not taking place in our own business operations or in our supply chains.

PBS is also committed to ensuring transparency in our own business and in our approach to tackling modern slavery risks throughout our supply chains. We expect the same standards from our suppliers so we provide a copy of this MSA Policy to our suppliers and we include specific prohibitions in our contracts with suppliers against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or minor children.

PBS believes that its modern slavery risk mitigation practices reflect its goals of acting ethically in the marketplace, with integrity to all workers, and with transparency to all stakeholders. Our modern slavery risk mitigation practices also make good business sense and are consistent with our public disclosure obligations under the Modern Slavery Act in Australia and other applicable laws.

Who must comply with this MSA Policy?

The prevention, detection, and reporting of modern slavery in any part of our business operations or supply chains is the responsibility of those working for us or under our control. This MSA Policy applies to the following (collectively, referred to as “you”):

1. All persons working for the Company or on our behalf in any capacity, including temporary and permanent employees at all levels, directors, officers, agency workers, seconded workers, volunteers, paid and unpaid interns, agents, independent contractors, external consultants, third-party representatives, and business partners (collectively, referred to as “Company workers”); and
2. Any person or entity acting as a supplier to the Company (Company supplier).

Training on this MSA Policy and on the risks PBS faces from modern slavery practices in our business operations and supply chains will be periodically provided to designated Company workers and Company suppliers, as necessary. PBS’s approach to eliminating modern slavery risks must be communicated to all Company workers and Company suppliers at or prior to the time of hire, onboarding, or other initiation of the relationship and reinforced, as appropriate, periodically thereafter.

You must ensure that you read, understand, and comply with this MSA Policy, as the same may be amended or updated from time to time. You are required to avoid any activity that might lead to or result in a breach of this MSA Policy.

How can you raise concerns or suspicions about modern slavery practices in the company’s business operations or supply chains?

You are encouraged to raise concerns about any issue or your suspicion of modern slavery in any parts of our business, our supply chains, or the supply chains of any supplier at the earliest possible stage.

Company Workers: Company workers must notify their manager or the PBS Chief Operating Officer as soon as possible if they believe or suspect that a breach of this MSA Policy has occurred or may occur in the future. Alternatively, a Company worker may report their belief or suspicions to ProAct Link, our external whistleblowing hotline. Company workers may make reports to this hotline either by name or anonymously, in accordance with our Whistleblower Policy.

If a Company worker is unsure about whether a particular act, the treatment of workers more generally, or their working conditions, whether in our business operations or supply chains, constitutes any of the various forms of modern slavery, the Company worker should raise their concerns with their manager or the Company’s Chief Operating Officer as soon as possible.

Company Suppliers: Company suppliers must notify the Project Manager as soon as possible if they believe or suspect that a breach of this MSA Policy has occurred or may occur in the future. Alternatively, a Company supplier may report their beliefs or suspicions to our external whistleblowing hotline, ProAct Link. Company suppliers may make reports to this hotline either by name or anonymously.

If a Company supplier is unsure about whether a particular act, the treatment of workers more generally, or their working conditions, whether in our business operations, the business operations of the Company supplier, or the supply chains of the Company supplier, constitutes any of the various forms of modern slavery, the Company supplier should raise its concerns with the PBS Project Manager as soon as possible.

Hotline Reporting Access: Reports to the whistleblowing hotline may be made at any time convenient for you. The ProAct Link hotline is available 24/7/365, accommodates multiple languages, and is accessible to those with hearing or sight impairment.

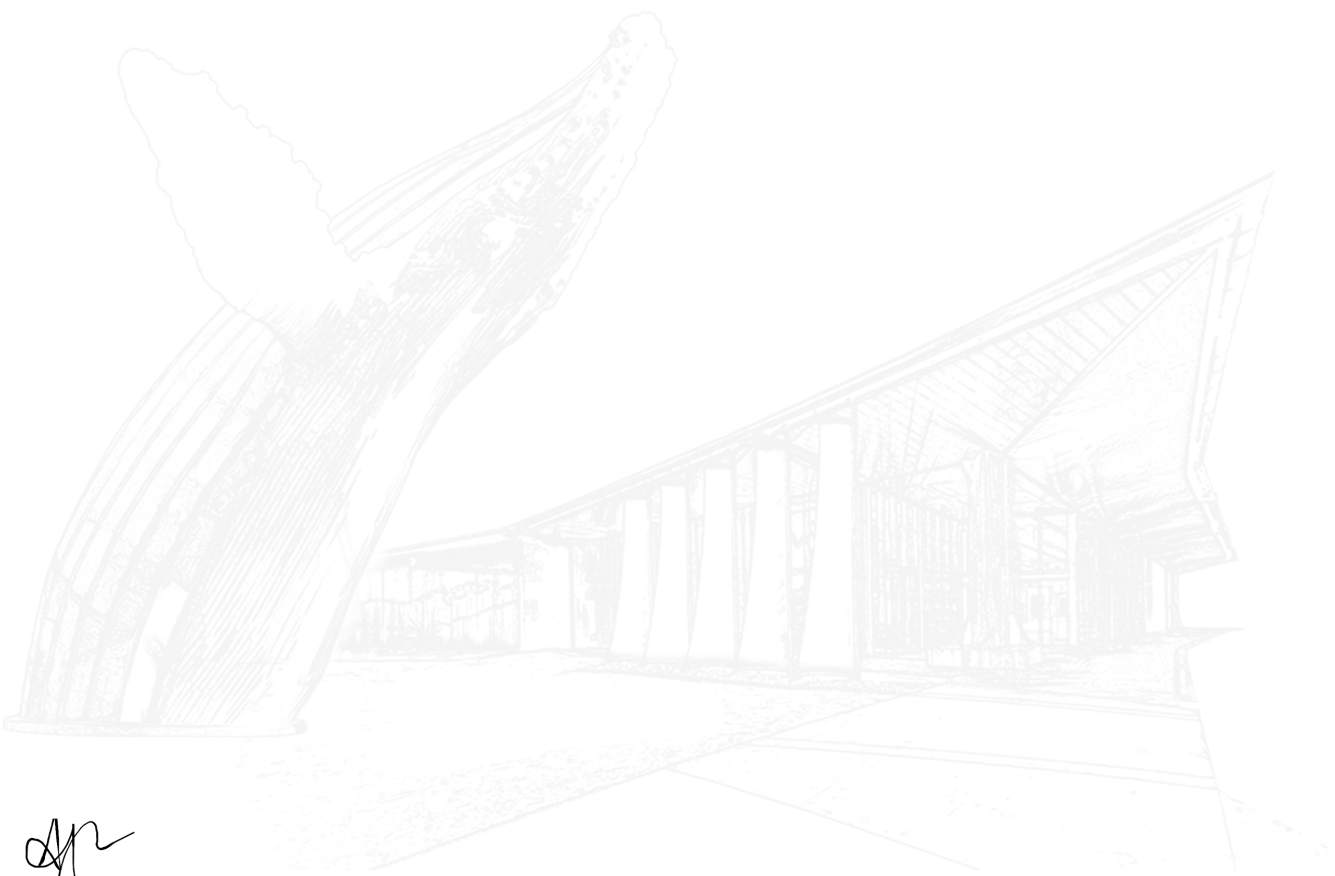
What happens in the event of a breach of this MSA Policy?

Any Company worker who breaches this MSA Policy will face disciplinary action in accordance with PBS employment agreements and HR policies. PBS may terminate its relationship with any Company supplier if the Company supplier breaches this MSA Policy, even if our written contract with the Company supplier does not specifically provide that a breach of this MSA Policy is grounds for termination of the contract.

Who is responsible for this MSA Policy in the company?

The Board and senior management of PBS maintain overall responsibility for ensuring this MSA Policy is implemented by the Company and various officers, directors, and/or managers within PBS maintain day-to day responsibility for implementing this MSA Policy, monitoring its use and effectiveness, dealing with any inquiries about this MSA Policy, auditing internal control systems and procedures to ensure they are effective in countering modern slavery, and generally ensuring compliance with the obligations under this MSA Policy and applicable governing laws. Management at all levels of the Company are also responsible for ensuring that those reporting to them understand and comply with this MSA Policy and are given adequate training on the requirements of this MSA Policy and on the risks of modern slavery practices in our business operations and supply chains.

If you have any questions regarding this MSA Policy, please contact the PBS's Chief Operating Officer.



Signed:

Name: Adam Moore (Managing Director)

Date: 1/8/2021