

# Modern Slavery Policy

## **Shine Justice Ltd**

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## Modern Slavery Policy

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Shine Justice Ltd (**Shine**) is the holding company of businesses which provide legal services. Shine is committed to standing up for the rights of everyday people.

Shine is an ASX listed company and is Australian owned. Shine has over 50 branches and more than 1000 employees servicing clients.

Shine upholds the following values in its operations:

**Always stand up for the little guy:** We stand up for the underdog, giving a voice to those who would otherwise be unheard. We are tenacious and never, ever give up. We pride ourselves on never shying away from the tough cases.

**Dare to be different:** We are not your typical law firm, we follow our own path. We believe the impossible can be achieved. We challenge the status quo in our pursuit of justice for our clients.

**Ahead of the pack:** We look to the future for tomorrow's opportunities. We pioneer new ways. We are leaders rather than followers.

Shine acknowledges that it has an obligation to protect human rights, starting from the way it conducts its business now and into the future. Shine is committed to ensuring that there is transparency in its operations and approach to tackling modern slavery. Shine wishes to prevent modern slavery from ever taking place in its operations and supply chains.

### 1 Purpose of this Policy

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The purpose of this Modern Slavery Policy (**Policy**) is to outline Shine's commitment to prevent, detect and report the risk of slavery or human trafficking within Shine's operations and supply chains.

The Policy also articulates the fundamental elements of Shine's approach to human rights and how Shine demonstrates its commitment to respect human rights in line with international frameworks.

### 2 Application

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This Policy applies to all directors, senior management and employees, full-time, part-time and casual and contractors at every level of Shine, while engaged with the Shine Justice Ltd Group (**Shine Group**).

This Policy applies in addition to Shine's existing Code of Conduct.

This Policy may be altered by the Board of Shine at any time. All staff are expected to familiarise themselves with the Policy as amended from time to time.

### 3 Policies

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As well as this Policy, employees of Shine adhere to a number of workplace policies to ensure that we are performing in accordance with the principles of best practice and continuous improvement which include:

- Code of Conduct
- Diversity Policy
- Child Care Support Policy
- Complaint Management Policy
- Domestic and Family Violence Policy
- Dress Policy
- Employment and Background Checks Policy

- Flexible Work Policy
- Compressed 9 Day Fortnight Policy
- Good Working Relationships Policy
- Graduate Policy
- Leave Policy
- Managing Unsatisfactory Work Performance Policy
- Parental Leave Policy
- Practising Certificates Policy
- Qualifying Period Policy
- Purchased Leave Policy
- Recruitment Policy
- Relocation Policy
- Share the Shine Employee Referral Policy
- Shine Internal Privacy Policy
- Study Assistance Policy
- Temporary Staff Recruitment Policy
- Volunteer Leave Policy
- Whistleblower Policy
- Work Health and Safety Policy
- Workplace Rehabilitation Policy

#### **4 Compliance with laws and standards**

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Shine will comply with all local laws and legislation in relation to the employment of personnel. This includes, but is not limited to:

- (a) *Fair Work Act 2009 (Cth)*
- (b) *Modern Slavery Act 2018 (Cth)*
- (c) *Australian Criminal Code Act 1995 (Cth)*, specifically, Division 270 or 271 of the Criminal Code, extending to conduct in and outside of Australia;
- (d) Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework;
- (e) Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children;
- (f) ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

## **5 Modern Slavery and Human Rights**

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Modern slavery has a broad scope and includes practices involving slavery or slavery like offences, forced labour, deceptive recruiting for labour or services, forced marriage offences, debt bondage, threats of coercion, trafficking in persons and/or children, organ trafficking, and harbouring a victim.

Shine understands that modern slavery is unlikely to prosper where other human rights are respected. The *Modern Slavery Act 2018 (Cth) (MSA)* draws on principles adopted in the 2011 United Nations Guiding Principles on Business and Human Rights (**UNGPs**). The UNGPs set a global standard of expected conduct for all business enterprises.

Shine undertakes to comply with the MSA, the UNGPs and all other applicable modern slavery and human rights laws and frameworks. We expect all employees and suppliers of the Shine Group to comply with our human rights and modern slavery commitments.

Shine believes that all business enterprises should respect human rights and address any adverse impact their business practice has or may have on human rights. All people have the right to protection from exploitation, violence and abuse.

## **6 Risk assessment and due diligence processes**

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As the primary work of Shine involves the administration of legal services, Shine considers the risk of modern slavery within its direct internal operations to be low. However, Shine acknowledges that multi-tiered supply chains may mean it is directly or indirectly exposed to the risk of modern slavery.

Shine has risk management processes to assist in identifying areas of concern so that mitigating action can be taken to lessen those risks. These include:

- a) Inclusion of modern slavery clauses in material new procurement contracts;
- b) Due diligence processes if appropriate when taking on new suppliers;
- c) Our Supplier Code of Conduct, which details the expectations of all suppliers in relation to preventing modern slavery;
- d) Our Whistleblower Policy, which enables all employees to comfortably and confidentially report any concerns they have relating to modern slavery in the Shine Group's operations or within supply chains; and
- e) Modern slavery training for all staff regarding the risks Shine faces in relation to modern slavery in its supply chains.

## **7 Suppliers**

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The Shine Group mostly deals in legal services and as such we believe the Shine Group has a relatively simple supply chain that is built to support the core legal practices and maintain technology, systems and infrastructure.

The Shine Group's suppliers include suppliers of a variety of goods and services including office cleaning, facilities management, office equipment, office supplies, IT, communications, property, transport, marketing, medical services, recruitment services, auditors, banks, legal counsel and insurers.

Shine seeks to do business with suppliers that have similar values, ethics and sustainable business practices including in relation to human rights. Shine understands that the risks relating to suppliers will vary depending on their industry, geographic location and company size.

The Shine Group will take reasonable steps to ensure that its suppliers are aware that they are expected to adhere to the standards expected by Shine, in accordance with our Supplier Code of Conduct.

## **8 Communication and Awareness of this Policy**

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The awareness, responsibility and conduct of the Shine Group employees are instrumental in mitigating the risk of modern slavery within our business.

Shine will provide training to staff on identifying modern slavery risks in supply chains generally and ensuring compliance with Shine's obligations under the MSA.

## **9 Breach of the Policy**

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Any employee who breaches this Policy by engaging in or conspiring to engage in any modern slavery conduct may face disciplinary action. Shine may terminate our relationship with individuals or organisations working on our behalf if they breach this Policy. Referral action to proper authorities will be taken in cases involving breaches of the criminal law.

## **10 Responsibility of staff**

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All staff have a responsibility to prevent, identify and report any concerns they may have in relation to modern slavery within the Shine Group's operations and supply chains.

Such concerns are to be reported to the Company Secretary of Shine or otherwise in accordance with our Whistleblowing policy.

All reports of concerns relating to modern slavery will be treated with sensitivity, confidentiality and will be taken very seriously.

Queries relating to this Policy may be directed to the Company Secretary.

## **11 Review of this Policy**

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This Policy was initially adopted on 24 October 2019 and is subject to a review by the Board on an annual basis to ensure that it is operating effectively and to consider whether any amendments are required.