

Engentus Pty Ltd.

Ethical Business Practices Policy

Revision Number	Revision Date	Description	Approved By
1	28/06/21	Rebranding	

Ethical Business Practices Policy

Engentus is built on a culture of fair, ethical business practice and behaviour towards all its stakeholders. It is a fundamental building block of the business that its employees, suppliers, contractors and external advisors understand the importance of ethical business practices at all levels of the business and comply with Engentus' requirements in this regard. In particular, practices regarding the selection, engagement and treatment of workers by the company and its suppliers will always be according not only to law but to best practice in terms of health, welfare and human rights, regardless of jurisdiction.

With specific regard to selection of contractors, suppliers and distributors, it is expected that they will always be ethical in their dealings with stakeholders and suppliers and that appropriate standards of human rights protections are in place. The guidance provided by the UN Human Rights Commission, the International Labor Organisation and the OECD Due Diligence Guidance for Responsible Business Conduct should be used as helpful benchmarks in conducting due diligence on potential business partners.

It is essential that our own people understand these principles and that our key suppliers understand and agree to abide by them. Suppliers that do not apply these principles in their own business will be removed from Engentus supply chain. It is a condition of continuing engagement as a supplier or contractor to Engentus, that the principals outlined in this document are accepted and complied with.

Conditions of Employment

Within Australia, all employees of Engentus and any suppliers and/or contractors are governed by the *Fair Work Act 2009* and the relevant industrial awards. Employees are also protected by and subject to the various human resources policies and procedure in place within the Company, a list of which is appended to this policy.

This includes but is not limited to:

1. Working hours
2. Wages and conditions;
3. Rest periods;
4. Shift patterns;
5. Leave entitlements.

These terms and conditions shall be laid out in a written offer of employment to each employee before commencement of employment.

It is a condition of remaining a supplier to Engentus that all requirements are met by these organisations and can be demonstrated to be so. Suppliers and contractors must comply

with all equivalent legislation within their jurisdiction of operation. This shall include adherence to requirements for rates of pay, working hours, health, safety and other benefits as required by law in their jurisdiction. Engentus may, at its discretion audit, or have a third party audit any contractor or supply to ensure compliance.

Representation of Workers

It is a basic right of all workers to be permitted to organize or be represented by a suitable labour organization (union or other) to ensure that their legal rights are protected and to provide a suitable means of communication with management. While Management of the company retains responsibility for the company's performance and statutory compliance in all regards, the ability for workers to feel that they have a legitimate conduit for communication of their concerns to management is essential.

In Australia it is illegal to deny such access to employees. In other jurisdictions where Engentus may do business over time, however this will not necessarily be the case. In these circumstances, Engentus will require of its suppliers and contractors that they observe this right and demonstrate, when required that it is in place.

Modern Slavery

According to the Australian Government Department of Home Affairs:

“Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.

Practices that constitute modern slavery can include:

- *human trafficking*
- *slavery*
- *servitude*
- *forced labour*
- *debt bondage*
- *forced marriage, and*
- *the worst forms of child labour”*

Engentus will not countenance dealing with any organization that allows these practices within its business or supply chain. The [UN Guiding Principles on Business and Human Rights](#) provide a useful framework for these considerations and will inform the company's approach to governing matters of appropriate personnel management and engagement. Suppliers and contractors are required to comply with these guidelines and Engentus reserves the right to terminate any supplier or contractor found to be in breach of them.

Restriction of Movement / Coercion

No worker may be coerced in any way to work for any organization, nor can their ability to exit the business or to travel be restricted by the organization. To this effect, no identification or travel documentation belonging to any worker shall be retained by nor demanded by the organization as a condition of employment.

Improper Duress

All workers must be employed on the basis that they are free to cease employment at any time, according to law without restraint. Any action designed to bind an employee to the organization (financial or other) is inappropriate and will not be tolerated by Engentus.

Accommodation

Engentus does not, in its normal business provide long term accommodation for its employees. In the event that the execution of an employee's reasonable duties requires an employee to relocate to a location away from their normal place of residence, accommodation will be provided that is appropriate, safe and convenient to the temporary workplace. Accommodation shall not be linked to the conditions of continued employment of Engentus employees or of employees of any suppliers/ contractors, except only for short term, project-based accommodation as indicated above. Provision of accommodation shall not be used as means of control over the freedom of employees to either travel or exit the business.

Grievance Handling Mechanisms

Engentus maintains, under its general human resources policies an open, transparent grievance handling mechanism, which is open to all employees. It is a condition of engagement as a supplier or contractor to Engentus that third parties can demonstrate an equivalent system within their business. This shall include mechanism by which confidential, anonymous complaints may be registered to alert management to matters of legal or ethical concern, including fraud, abuse, sexual harassment, and other issues.

Employment of Minors

As a general principal, in keeping with the nature of Engentus' key markets and target industry sectors, the company does not employ minors (defined in Australia as being under the age of 18 years). Should there be occasion, however where such staff are engaged, it is essential they are employed according to all pertinent State and Federal legislation, specifically the *Fair Work Act 2009*.

It is a matter for individual suppliers and contractors to decide whether it is appropriate to employ minors, but it is a condition of remaining a supplier to Engentus that any employee

under eighteen years of age is employed in complete accordance with the legal frameworks provided in the jurisdiction in which they are employed. No worker shall be employed that is below the statutory minimum age allowed within the jurisdiction in which the supplier's business is located.

Migrant Labour

In the event that any supplier or contractor employs staff that move to the location for the purposes of employment (either within the country or internationally), it is imperative that all the provisions above are observed. Additionally, should intermediaries or agents be used to engage and employ the workers as contractors, all the provisions of this policy shall be deemed to apply to them also.

Recruitment

Engentus will, from time to time, engage third party agencies to recruit workers on its behalf. Engentus will pay a fee to such organisations for their service. No recruiter shall charge a fee to any employee in order to offer them for employment by Engentus. This requirement shall similarly apply to all suppliers and contractors.

Yours sincerely,



David John Izzard
Managing Director
Engentus Pty Ltd