

ENTRO

OPEN POSSIBILITIES

ETHICAL SOURCING
AND MODERN SLAVERY
POLICY STATEMENT

ENTRO Global strictly prohibits any form of Modern Slavery and is dedicated to conducting all our business dealings with ethical and honest practices. We take responsibility to ensure that no Modern Slavery is occurring in any of our business operations or supply chains. This commitment is in accordance with the Australian Modern Slavery Act 2018 and other applicable legislation. Suppliers are expected to comply with the minimum standards set forth below.

The minimum standards expected of suppliers include:

No forced or bonded labour:

- No utilization of forced or bonded labour: Suppliers must not employ any type of forced labour, bonded labour (where work is performed to repay a debt incurred by another person), or indentured labour (where workers are prohibited from leaving employment at their discretion), and instead allow employment to be freely chosen.
- Respect for freedom of movement: Suppliers must respect the freedom of movement of their workers and refrain from controlling identity papers, holding money deposits, or taking any other action that may impede workers from terminating their employment.
- Freedom to leave employment: Suppliers must ensure that workers are free to leave their employer after providing reasonable notice.

No child labour:

Suppliers are expected to:

- Comply with the minimum legal working age: Suppliers must comply with the minimum legal working age in the country where they operate. If there is no such law, they must follow the International Labour Organisation (ILO) Convention 138. Suppliers must be able to verify the age of all employees to ensure compliance.
- Accept principles of remediation for child and underage workers: Suppliers must accept the principles of remediation for child and underage workers. In case such labour is discovered, suppliers must establish and implement appropriate remediation for these workers and develop effective systems to prevent the use of child labour in the future.

Wages, benefits and transparent record keeping:

Suppliers must:

- Comply with local laws: Suppliers must comply with all laws regulating local wages, overtime compensation, and legally mandated benefits, at a minimum.
- Maintain accurate and transparent records: Record-keeping must be accurate and transparent, especially concerning wages, benefits, and working hours.
- Provide written information: Workers must receive written and understandable information about their employment conditions before they enter employment, as well as about their wages for each pay period.
- Obtain permission for wage deductions: Deductions from wages for disciplinary measures or any deductions not provided for by law shall not occur without the express permission of the worker concerned.
- Record disciplinary measures: All disciplinary measures should be recorded.

Working hours:

Suppliers are required to:

- Comply with local laws: Working hours must comply with applicable local laws.
- Adhere to maximum hours per week: Workers should not be required to work more than the maximum hours per week as stipulated by local laws, or in the absence of such law, by the applicable ILO convention.
- Agree on overtime: Overtime must be agreed upon and not be excessive. It should not be requested on a regular basis and must be compensated as prescribed by applicable local laws.

No harassment or abuse:

Suppliers are expected to:

- Treat workers with dignity and respect: Workers must be treated with dignity and respect in all situations.
- Provide a harassment-free workplace: Suppliers shall provide a workplace free from harassment, including physical, sexual, verbal, or visual behaviour that creates an offensive, hostile, or intimidating environment.

Freedom of association, grievance mechanisms and recourse:

Suppliers must:

- Respect workers' rights to association: Suppliers shall respect the rights of workers to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country of operation.
- Allow unionization: Workers should have the right to join or form trade unions of their choosing.
- Avoid interference: Suppliers should not interfere with, obstruct, or prevent legitimate related activities, such as collective bargaining.
- Allow worker representatives: Workers are allowed to select worker representatives who should not be discriminated against and should have regular access to company management or appropriate process in order to address grievances and other issues.
- Establish a policy for grievance reporting: Suppliers must have a policy in place for workers to approach management on issues of concern, on their own or through worker representatives, confidentially.

Working conditions:

Suppliers must:

- Provide a safe and hygienic working environment: Suppliers shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards.
- Train workers: Workers shall receive adequate and regular training to perform their jobs in a safe manner.
- Provide personal protective equipment and machinery safeguards: Personal protective equipment and machinery safeguards shall be supplied, and workers trained in their use.
- Provide clean and safe accommodation: Where suppliers provide accommodation, it shall be clean, safe, and meet the basic needs of workers.
- Provide basic facilities: Workers will have access to clean toilet facilities, clean drinking water, and, where appropriate, sanitary facilities for food storage and preparation.
- Allow workers to refuse unsafe work: Workers have the right to refuse work that is unsafe.

Animal Welfare

- Suppliers must ensure animals are treated humanely and with respect.

Hiring and regular employment:

- It is the responsibility of suppliers to furnish every worker with a transparent and comprehensible labour agreement that outlines all the employment terms, entitlements, and conditions mandated by law. Moreover, suppliers ought to strive towards offering permanent employment to their workers whenever feasible, and to steer clear of labour-only contracting arrangements, back-to-back short-term contracts, excessive piece-work or fake apprenticeship programs that enable them to shirk their obligations towards regular employment of workers.

Migrant workers:

- Migrant workers employed by suppliers must receive the same entitlements as local workers as required by local laws. Any fees or commissions related to the employment of migrant workers must be covered by the employer, and the employer cannot require workers to surrender their identification documents. If workers are employed through a third-party agent or contractor, the supplier is responsible for ensuring that they comply with these Minimum Standards.

Environmental compliance

- Suppliers are required to comply with relevant local and national environmental protection laws. Additionally, suppliers are expected to comply with international environmental protection standards to the extent that they are practical and feasible.

No bribery:

Suppliers must not:

- Make unlawful or improper payments: Bribes, favours, benefits, or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise.
- Maintain inaccurate records: Suppliers shall keep accurate records of all payments made and received in cash or in kind, for audit purposes.

Sub-contracting:

Suppliers must:

- Have adequate processes in place: Ensure that adequate processes are in place for properly managing sub-contracting.
- Ensure compliance: Ensure that subcontractors operate in accordance with this and any applicable divisional/business unit policy.
- Adhere to the contract: Ensure that sub-contracting is undertaken strictly in accordance with the contract.

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