

Modern Slavery Policy

1 Purpose of this policy

Modern slavery can take many forms. Some modern slavery practices across the globe in our contemporary world include slavery, human trafficking, servitude, forced labour, child slave labour, and debt bondage.

Zoom2u Technologies Ltd (Z2U or Company) recognises that businesses can play an important role in eradicating modern slavery, and accepts that this is a mainstream corporate responsibility. We also understand that modern slavery is a multi-faceted and complex problem, which ultimately will only be able to be overcome through collective action, commitment and responsibility. In this context, Z2U has developed this policy as part of our commitment to working with all our stakeholders and suppliers to achieve the common goal of eradicating modern slavery.

We are committed to implementing appropriate controls with the aim of eradicating modern slavery in our business, addressing risks, and raising awareness of, modern slavery in our operations and supply chains. We also aim to identify and manage risks related to violations of other human rights (such as equality, personal security and freedom from discrimination and violent or degrading treatment) across our business and through our supply chain.

2 Scope

This policy applies to any person or entity working for or on behalf of, or providing services to or doing business with, Z2U in any capacity, including all suppliers, employees, officers, contractors, sub-contractors and consultants.

Notwithstanding the above, given the nature and size of the businesses operated by Z2U, the primary focus of Z2U's modern slavery policy is on offshore suppliers of manufactured products and software that are incorporated in Z2U's products and on sold to Z2U customers.

Z2U requires all who have, or seek, a business relationship with Z2U to familiarise themselves with this policy and act in a way that is consistent with its intent. Z2U also requires all its suppliers to take verifiable steps to comply with this policy.

This policy does not form part of any contract, including (if relevant) any contract of employment. However, it includes directions to staff of Z2U, which are expected to be complied with.

3 Our workplace

We seek to ensure that our staff members do not fall victim to modern slavery practices in any way. We aim always to comply with relevant Australian workplace laws, including those that deal with employment conditions and safety, and other community expectations and ethical standards.

Z2U is committed to ensuring that our employment conditions at least meet minimum legal standards. We are committed to creating and maintaining an inclusive and safe environment for all staff members, which includes treating workers with dignity and respect, and providing a workplace free from discrimination and harassment.

4 Supply chain

Z2U recognises that complex supply chains increase the risk of modern slavery and are particularly difficult to monitor. Limiting modern slavery in Z2U's supply chain requires suppliers, and other entities providing goods and services to Z2U, to play a part and remain vigilant to the risk by regularly scrutinising their operations.

As far as reasonably practicable, we require our suppliers to:

- not use any type of:
 - forced labour (any work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person);

- bonded labour (which is not for compensation received by the worker, but to repay a debt, including one incurred by another person offering the worker's labour in exchange); or
- indentured labour (in which an employer forbids workers from leaving employment at the worker's discretion);
- comply with the minimum legal working age in the country in question or, in the absence of such law, as set under the International Labour Organisation (ILO) Convention 138;
- comply at a minimum with all laws regulating local wages and other legally mandated benefits;
- comply with applicable local laws regarding working hours;
- treat workers with dignity and respect, and provide a workplace free from discrimination and harassment, including physical, sexual or verbal behaviour that creates an offensive, hostile or intimidating environment; and
- 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.

Z2U encourages its suppliers to promote best practice and continuous improvement of business practices and working conditions.

5 How we aim to address risks of modern slavery and other human rights violations

Z2U:

- where appropriate aims to include clauses addressing the risks of modern slavery and other human rights violations in its contracts with suppliers;
- requests offshore suppliers (of manufactured products and software that are incorporated in Z2U's products and on sold to Z2U customers) to complete questionnaires from time to time to determine which parts of our business and which of our supply chains are most at risk from modern slavery and other human rights violations; and
- where appropriate, as informed by our questionnaire, consults with suppliers in respect of the measures and strategies they have in place to ensure they limit the risk of modern slavery and other human rights violations.

6 Consequences of breach of this policy

If any person or entity to whom this policy applies does not comply with this policy, then Z2U will take whatever action it considers appropriate, which might involve disciplinary action (in the case of an employee) or the termination of a contract (in the case of a contractor or supplier).

If we find or suspect situations of modern slavery or other human rights violations in a supplier's operations or supply chains, Z2U will explore the appropriate response, which may include:

- taking further action to verify if modern slavery is occurring;
- consulting with experts in the industry or local government entities and/or authorities;
- collaborating with international and local organisations or civil society groups;
- involving law enforcement;
- addressing underlying structural factors that can enable situations of modern slavery; or
- terminating Z2U's relationship with the affected entity, particularly if the affected entity refuses to address the issue and there is no real prospect of change.

7 How to report concerns about modern slavery

Employees are encouraged to report any genuine concerns about modern slavery relating to our people, business or supply chain. Please refer to the Code of Conduct or Whistle-blower Policy for further detail about how to raise concerns.

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