



Elephant Teams

Modern Slavery Policy

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Last Updated: 15/01/2025

Prior Update: 30/06/2024

Reviewed Period: Annually

Key change tracker:

- Last policy wording change 30/06/2024.
- Last Compliance Officer change 15/01/2024, adding Aksha Muthukumar as secondary line of defence in Sri Lanka.
- Training register updated 15/01/2024 and locked on SharePoint.



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Introduction

Modern slavery constitutes one of the gravest violations of fundamental human rights. Despite its abolition over a century ago in many parts of the world, millions of individuals remain subjected to exploitative practices, including forced labour, human trafficking, servitude, and debt bondage. Such practices undermine human dignity and perpetuate cycles of poverty and inequality.

Elephant Teams Pty Ltd acknowledges the significant risks associated with modern slavery, particularly within the socio-economic context of Sri Lanka, where we operate a large portion of our workforce. As highlighted in the Global Slavery Index by the Walk Free Foundation ([Walk Free Foundation](#)), vulnerabilities are quite prevalent in the Asia-Pacific region. This awareness drives our proactive approach to identifying, preventing, and addressing modern slavery risks within our operations and supply chains.

This Policy serves as a comprehensive guide to ensure that our clients, employees, and stakeholders can confidently rely on Elephant Teams Pty Ltd to uphold the highest standards of ethical business conduct. By embedding transparency, accountability, and continuous improvement into our practices, we aim to foster a culture that values and protects human rights.

1. Purpose

The purpose of this Modern Slavery Policy is to outline Elephant Teams Pty Ltd's unwavering commitment to eliminating modern slavery and human trafficking within our operations and supply chains. This document establishes a framework for ensuring that our business activities are conducted ethically and transparently, aligning with the principles of the Australian Modern Slavery Act 2018.

This section is crucial as it provides the foundation for our organisational efforts to combat modern slavery. It underscores the importance of understanding the broader implications of modern slavery, not only as a legal compliance requirement but also as a moral and ethical obligation. Through this policy, we aim to ensure that our practices protect the rights of all individuals involved in our operations, directly or indirectly. By doing so, we foster trust with our clients and stakeholders and reinforce our reputation as an ethically responsible organisation.

The Policy also seeks to:

- Provide a clear understanding of modern slavery and its implications.
- Define our responsibilities in preventing and addressing modern slavery risks.
- Support the development of strong, ethical supply chain partnerships.
- Demonstrate our compliance with Australian and international legal obligations.



2. Scope

This Policy applies to all employees, contractors, suppliers, and business partners engaged with Elephant Teams Pty Ltd, irrespective of their location. While our operations span Australia and Sri Lanka, the principles outlined herein are globally applicable, ensuring ethical conduct and adherence to international human rights standards.

The scope of this Policy is critical because it establishes the boundaries of our commitment and accountability. By applying the principles of this Policy across all facets of our business, we ensure that modern slavery risks are addressed systematically and consistently. Particular attention is given to addressing modern slavery risks in Sri Lanka, recognising its unique socio-economic challenges and their impact on our operations. This comprehensive approach not only ensures compliance with global standards but also demonstrates our proactive stance in mitigating risks, enhancing accountability, and fostering best practices across all levels of our business.

3. Commitment to Human Rights

Our Core Values and Ethical Standards:

Elephant Teams Pty Ltd is committed to the following principles:

- **Adherence to Human Rights Standards:** Upholding international frameworks, including the Universal Declaration of Human Rights.
- **Prevention of Exploitation:** Actively working to prevent all forms of modern slavery, including child labour, forced labour, and human trafficking.
- **Ethical Employment Practices:** Ensuring fair treatment, equitable wages, and safe working conditions for all employees.
- **Partnerships for Progress:** Collaborating with clients, suppliers, and industry bodies to address systemic challenges and improve industry practices.
- **Transparency and Accountability:** Ensuring open communication and rigorous reporting to foster trust and compliance.

This commitment to human rights underpins all aspects of our operations. It reflects our ethical responsibility to protect individuals from exploitation and ensures that our practices are aligned with global best practices.

By embedding these values into our organisational culture, we create a foundation of trust and accountability that extends to our clients, suppliers, and employees.



4. Due Diligence Practices

4.1 Risk Assessment

Elephant Teams Pty Ltd conducts regular and detailed risk assessments to identify vulnerabilities within our operations and supply chains. Our approach includes:

- **Supply Chain Analysis:** Mapping all tiers of our supply chain to identify high-risk regions and industries susceptible to modern slavery.
- **Global Slavery Index Utilisation:** Using reliable data sources, such as the Global Slavery Index, to evaluate country-specific risks, particularly in Sri Lanka.
- **Stakeholder Engagement:** Consulting with employees, suppliers, and independent experts to gain insights into emerging risks and effective mitigation strategies.
- **Dynamic Monitoring:** Continuously updating our assessments to reflect changes in the socio-economic environment and industry standards.

This section highlights the importance of proactively identifying areas of potential vulnerability. Risk assessments are fundamental to developing targeted strategies that mitigate risks and ensure compliance with legal and ethical standards. By integrating data-driven insights with stakeholder input, we create a holistic approach to risk management.

4.2 Supplier and Contractor Vetting

Elephant Teams Pty Ltd maintains a rigorous vetting process to ensure all suppliers and contractors adhere to our ethical standards. Key steps include:

- **Supplier Code of Conduct:** Requiring all partners to commit to principles prohibiting modern slavery and promoting fair labour practices.
- **Audits and Compliance Checks:** Conducting regular reviews, including on-site inspections and documentation audits, to verify adherence to standards.
- **Risk-Based Evaluation:** Categorising suppliers based on their risk profiles and focusing on monitoring efforts on high-risk entities.
- **Remediation Plans:** Working collaboratively with non-compliant suppliers to implement corrective actions, with disengagement as a final measure if standards are not met.

Supplier and contractor vetting is crucial for ensuring that all entities within our supply chain operate in line with our values. This process establishes clear expectations and promotes accountability among our partners, reinforcing our commitment to ethical business practices.



4.3 Employee Recruitment and Onboarding

Elephant Teams Pty Ltd's hiring practices are structured to safeguard against exploitation and ensure fairness and transparency:

- **Direct Recruitment:** We avoid using intermediaries whenever possible to minimise the risk of deceptive practices. When third-party recruitment agencies are utilised, they are thoroughly vetted to ensure compliance with our ethical standards.
- **Transparent Employment Contracts and no recruitment fees:** Contracts are provided in a language understood by the employee and detail all terms of employment, including wages, hours, benefits, and conditions. We have a zero-tolerance policy for recruitment fees charged to employees, ensuring that workers are not financially burdened as a condition of employment.
- **Consent-Based Living Audits:** With employee consent, we conduct pre-employment and periodic home audits to verify that living conditions meet acceptable standards and that workers are not exposed to exploitation.
- **Oversight and training:** Australian management visits the country on an annual basis and provides a number of face to face training regarding modern slavery and other critical compliance processes. These are documented in our internal register to ensure all staff understand the requirements.

These measures are vital to creating a recruitment and onboarding system that protects workers' rights and supports their well-being from the outset.

4.4 Monitoring and Reporting

To ensure continuous compliance, Elephant Teams Pty Ltd implements robust monitoring systems, including:

- **Regular Audits:** Periodic reviews of operations and supply chains to assess compliance with modern slavery policies.
- **Grievance Mechanisms:** Confidential and secure channels for reporting concerns or breaches.
- **Annual Modern Slavery Statements:** Publishing reports aligned with legislative requirements, reflecting our progress and areas for improvement.

Our monitoring framework is designed to detect issues early and address them effectively, fostering an environment of accountability and continuous improvement.



5. Training and Awareness

Education is a cornerstone of our approach to addressing modern slavery risks. By empowering our workforce and partners with knowledge and tools, we ensure vigilance and informed action. Our training programmes include:

- **Comprehensive Induction Training:** All new employees undergo training on identifying and mitigating modern slavery risks as part of their onboarding process.
- **Role-Specific Training:** Tailored sessions for leadership, compliance teams, and supply chain managers to address their specific responsibilities.
- **Workshops and Refresher Courses:** Regular opportunities for all staff to refresh their knowledge, ensuring up-to-date awareness of risks and responsibilities.
- **Collaboration with Experts:** Partnering with external organisations to incorporate the latest insights and practices into our training content.

By maintaining a robust training register and integrating feedback into future sessions, we foster a culture of continuous learning and improvement.

6. Governance and Accountability

Elephant Teams Pty Ltd has established clear governance structures to ensure effective oversight and accountability for implementing this Policy. We have appointed a dedicated Modern Slavery Compliance Officer, whose responsibilities include:

- **Policy Implementation:** Ensuring that this Policy is effectively integrated across all business operations and supply chains.
- **Annual Reviews:** Conducting regular reviews to assess the effectiveness of our practices and making adjustments to address emerging risks.
- **Stakeholder Engagement:** Liaising with clients, suppliers, and regulatory bodies to foster a collaborative approach to modern slavery prevention.
- **Reporting and Transparency:** Preparing annual statements in compliance with the Australian Modern Slavery Act and ensuring these are accessible to all stakeholders.

These governance measures provide a strong foundation for ensuring our commitments are met and that we remain accountable to our clients, employees, and broader community.

Modern Slavery Compliance Officers as at such 15/01/2025:

- Senior Compliance Office - Rushdie Faizal (Sri Lanka)
- Compliance Officer - Aksha Muthukumar (Sri Lanka)
- Head of Compliance - Shehan Wijayasinghe (Australia)



7. Grievance Mechanism

Elephant Teams Pty Ltd recognises the importance of providing secure and accessible channels for reporting concerns about modern slavery. We have implemented the following mechanisms:

- **Confidential Reporting:** Employees, suppliers, and stakeholders can report concerns via a confidential email address compliance@elephantteams.com.au
- **Anonymous Reporting:** Anonymity is guaranteed for individuals who prefer not to disclose their identity.
- **No Retaliation Policy:** Whistleblowers are protected from any form of retaliation or adverse action as a result of raising concerns in good faith.

All reports are thoroughly investigated, and appropriate actions are taken to address identified issues. These mechanisms ensure that individuals feel supported and empowered to report unethical practices.

8. Continuous Improvement

At Elephant Teams Pty Ltd, we are committed to evolving our practices to address modern slavery risks effectively. This commitment includes:

- **Engagement With Experts:** Collaborating with industry leaders, NGOs, and regulatory bodies to enhance our understanding and responses.
- **Leveraging Technology:** Exploring innovative tools and platforms to improve supply chain transparency and risk management.
- **Feedback Integration:** Actively seeking feedback from employees, clients, and stakeholders to refine our practices.

By continuously improving our processes, we strengthen our capacity to address modern slavery and uphold the highest ethical standards.

