

MODERN SLAVERY POLICY

DMG-POL-HR-045

Revision: 2

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1. PURPOSE

This document sets out the policy of David Moss Group Pty Ltd to:

- Ensure the company complies with the Modern Slavery Act 2018 (Cth) and any other applicable Australian or international laws relating to modern slavery;
- Demonstrate our commitment to identifying, preventing, and addressing modern slavery in all its forms; and
- Promote awareness of modern slavery risks among our employees, contractors, and suppliers.

DAMOS is committed to acting ethically, responsibly, and with integrity throughout its operations and supply.

2. SCOPE

This policy applies to all individuals who perform work for or on behalf of David Moss Group Pty Ltd (DAMOS), including those engaged under David Moss Corporation Pty Ltd and David Moss Queensland Pty Ltd. It applies equally across all business units, branches, and operational sites of the David Moss Group.

This policy applies to all:

- Directors and officers
- Employees (full-time, part-time, fixed-term, casual)
- Labour hire workers, contractors, and consultants
- Agency personnel
- Suppliers, manufacturers, and service providers involved in delivering goods or services to DAMOS

DAMOS maintains a zero-tolerance approach to all forms of modern slavery. We are committed to acting ethically in all business dealings and ensuring effective systems and controls are in place to prevent modern slavery within DAMOS' operations and its supply chain.

3. DEFINITIONS

TERM	DEFINITION
Modern Slavery	Serious exploitation that includes trafficking in persons, slavery, servitude, forced labour, debt bondage, forced marriage, and the worst forms of child labour. Modern slavery can occur in any industry or supply chain.
Forced Labour	Situations where a person is coerced, threatened, or deceived into working against their will and is unable to leave their work or workplace.
Human Trafficking	The recruitment, harbouring, or movement of a person for the purpose of exploitation through coercion, deception, or force.

Servitude	Situations where a person’s personal freedom is significantly restricted and they are forced to work for another person.
Debt Bondage	When a person is forced to work to repay a debt and the terms of the debt are exploitative or unreasonable.
Child Labour	Work that deprives children of their childhood, education, health, or development, and includes the worst forms of child labour as defined by international standards.
Supplier / Contractor	Any third-party organisation or individual that provides goods or services to DAMOS, whether directly or indirectly.
DAMOS Representative	Any employee, contractor, labour hire worker, officer, consultant, or agent acting on behalf of or representing David Moss Group Pty Ltd.

4. LEGISLATION

This policy is consistent with the following legislation:

- Modern Slavery Act 2018 (Cth)
- Criminal Code Act 1995 (Cth)
- Fair Work Act 2009 (Cth)
- Work Health and Safety Act 2020 (WA)
- Work Health and Safety (General) Regulations 2022 (WA)
- Work Health and Safety Act 2011 (QLD)
- Work Health and Safety Regulation 2011 (QLD)
- Any other applicable Australian or international laws relating to modern slavery, human trafficking, or exploitation

5. RESPONSIBILITIES

5.1. Directors

The Directors of David Moss Group Pty Ltd hold overall responsibility for ensuring the company complies with its legal and ethical obligations related to modern slavery.

5.2. Executive Management

Executive Management is responsible for the day-to-day implementation of this policy, monitoring its effectiveness, and ensuring appropriate processes, controls, and reporting mechanisms are in place and updated as required.

5.3. Human Resources

Human Resources is responsible for supporting the implementation of this policy, including:

- Conducting risk assessments
- Reviewing and auditing internal controls
- Monitoring compliance across operations and supply chains
- Coordinating any required corrective actions

5.4. Management

All management personnel are responsible for ensuring that employees under their supervision:

- Understand this policy
- Follow the required processes
- Escalate concerns promptly

Managers must ensure that modern slavery risks are identified and addressed within their areas of responsibility.

5.5. Employees

All employees are responsible for:

- Complying with this policy in their day-to-day work
- Reporting concerns or suspected breaches immediately to their manager or Human Resources
- Supporting investigations where required

Employees are encouraged to raise any suspicion that modern slavery may be occurring within DAMOS' operations or supply chain. Concerns may also be reported under the Whistleblower Protection Policy, which provides protections for disclosures made in good faith.

6. POLICY AND PROCEDURE DETAILS

David Moss Group (DAMOS) recognises that modern slavery is a crime and a severe violation of human rights. Modern slavery includes forced labour, child labour, exploitative working conditions, human trafficking, slavery, servitude, debt bondage, and restrictions on freedom of movement.

DAMOS is committed to complying with the Modern Slavery Act 2018 (Cth) and all other relevant legislation. While DAMOS is not currently required to submit a formal Modern Slavery Statement under the Act, we remain committed to upholding the highest ethical standards across our operations and supply chains.

6.1. Supply Chains and Risk Assessment

DAMOS is committed to ensuring modern slavery does not occur within our supply chains, including the use of contractors, labour hire, service providers, and the procurement of materials or equipment.

We conduct reasonable due diligence to identify risks and confirm that suppliers and partners operate ethically and in compliance with applicable laws.

6.2. Actions to Prevent Modern Slavery

DAMOS has implemented the following actions to help prevent modern slavery:

6.2.1. Annual Audits

Our internal audit and compliance processes may include reviewing supply chain practices, supplier controls, and risk mitigation strategies relating to human rights and ethical conduct.

6.2.2. Whistleblower Protection

DAMOS encourages employees to report any concerns about potential breaches of this policy and provides protection to individuals who raise concerns in good faith under the Whistleblower Protection Policy.

6.2.3. Due Diligence and Remediation

Where a potential or actual violation is identified, DAMOS will take appropriate corrective action, which may include engaging with the supplier to resolve the issue or, where necessary, terminating the relationship.

6.2.4. Contractual Obligations

DAMOS includes clauses in supplier and contractor agreements prohibiting the use of forced labour, trafficking, slavery, or other forms of exploitation.

6.2.5. Reporting and Consequences

All employees are responsible for helping to prevent, identify, and report any suspected breaches of this policy. Concerns should be raised with management immediately.

Any breach of this policy by an employee, director, or officer may result in disciplinary action in accordance with DAMOS' disciplinary procedures. Serious breaches may constitute gross misconduct.

All employees, directors, and officers are expected to cooperate fully in any investigation into suspected breaches of this policy.

If a supplier is found to be breaching this policy, DAMOS will work with them where appropriate to develop a corrective action plan and resolve issues within an agreed timeframe.

DAMOS reserves the right to terminate relationships with suppliers, contractors, or organisations that fail to remedy breaches or who engage in modern slavery practices.

6.2.6. Communication and Awareness

This policy will be provided to all employees and made available to contractors and suppliers. DAMOS will provide training and communication to support awareness of modern slavery risks and to reinforce the importance of ethical and lawful practices.

6.3. Procedure

DAMOS has internal policies and procedures designed to operationalise this policy and support ethical and legally compliant business practices. These include the Code of Conduct, Whistleblower Protection Policy, and other governance documents that contribute to the prevention of human rights violations, including modern slavery.

7. RELATED POLICIES AND SUPPORTING DOCUMENTS

- DMC-POL-HR-001 - Code of Conduct, Values and Ethics

APPROVAL			
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Approved by Name:	Tim Moss	Approved by Title:	CEO
Signature:			This Modern Slavery Policy has been reviewed in accordance with relevant legislation and guidelines.