

## Modern Slavery Policy

Version: 1.0

Approval Date: 7 April 2026

Approved By: Board of Directors

Next Review Date: 7 April 2027

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### 1. Purpose

Bellandaine is committed to conducting business ethically and with integrity. This includes a zero-tolerance approach to modern slavery in all its forms within our operations and supply chain.

This policy outlines our commitment to identifying, mitigating and addressing risks of modern slavery and supports compliance with applicable legislation and client expectations.

### 2. Scope

This policy applies to all Bellandaine employees, directors, contactors, and any third-party suppliers engaged by the business.

### 3. What is Modern Slavery?

Modern slavery refers to serious forms of exploitation, including forced labour, human trafficking, servitude, debt bondage, and child labour. It involves situations where individuals cannot refuse or leave work due to coercion, threats, or deception.

### 4. Our Commitment

Bellandaine is committed to:

- Acting ethically and with integrity in all business dealings
- Maintaining systems and controls to minimize the risks of modern slavery
- Working with suppliers who share our values and commitment to lawful and fair labour practices
- Complying with all relevant laws in Australian and New Zealand

### 5. Risk Awareness

Given the nature of our business as property consultancy operating primarily within Australian and New Zealand, we consider our direct exposure to modern slavery risks to be relatively low.

However, we recognise that risks may arise indirectly through third-party suppliers, particularly in areas such as:

- Property maintenance and facilities services
- Cleaning and security services
- External contractors and consultants

Bellandaine remains vigilant to these risks and takes a proportionate approach to managing them.

## **6. Supplier Expectations and Due Diligence**

Bellandaine seeks to engage reputable suppliers who operate in accordance with applicable laws and ethical standards.

Our approach may include:

- Engaging suppliers with established and credible business practices
- Preferring suppliers based in Australian and New Zealand
- Considering supplier reputation and known risk factors where relevant
- Addressing any concerns raised regarding labour practices

Where appropriate, Bellandaine may request confirmation from suppliers regarding their compliance with modern slavery laws.

## **7. Responsibilities**

Directors and Leadership - Provide oversight of this policy and ensure appropriate governance measures are in place.

Employees and Contractors - Are expected to:

- Act in accordance with this policy
- Remain alert to potential indicators of modern slavery
- Report any concerns in good faith

## **8. Reporting Concerns**

Bellandaine encourages the reporting of any concerns relating to modern slavery or unethical conduct.

Concerns may be raised with a Director or any member of the leadership team. All reports will be treated seriously and, where appropriate, handled confidentially.

Bellandaine will not tolerate retaliation against individuals who raise concerns in good faith.

## **9. Breaches**

Any breach of this policy may result in disciplinary action, including termination of employment or engagement. Bellandaine may also cease working with suppliers who do not meet expected standards.

## **10. Review**

This policy will be reviewed periodically to ensure it remains appropriate to the size, nature and risk profile of the business.