	POLICIES AND PROCEDURES MANUAL	Policy No: HR-AU-030
		Revision No: 1
HR DEPARTMENT	Section: HUMAN TRAFFICKING & FORCED LABOUR POLICY	Effective Date: 1 Jan 2022

PURPOSE

San Miguel Yamamura Australasia Pty Ltd ('SMYA') is committed to comply with, and respects individual right under, Human Trafficking and Forced Labour Laws.

COMMENCEMENT OF POLICY

This Policy will commence from 1 January 2022. It replaces all other Human Trafficking & Forced Labour Policies (whether written or not).

APPLICATION OF POLICY

This Policy applies to employees, agents and contractors (including temporary contractors) of SMYA, collectively referred to in this Policy as 'workplace participants.

This Policy is not limited to the workplace or work hours. This Policy extends to all functions and places that are work related. For example, work lunches, conferences, Christmas parties and client functions.

This Policy does not form part of any employee's contract of employment. Nor does it form part of any other workplace participant's contract for service.

SMYA and its employees shall not tolerate engage in or support Human Trafficking or Forced Labour of any kind through SMYA's activities, including supply chain, or assist clients or any other party in doing so.


DEFINITIONS

"Forced Labour" means all work or service exacted from a person under threat or penalty (including slavery, servitude and forced recruitment), which includes penal sanctions and the loss of rights and privileges where the person has not offered himself or herself voluntarily.

"Human Trafficking" means the act of recruiting, harbouring, transporting, providing or obtaining a person for forced labour or commercial sex acts through the use of fraud, coercion (e.g., threats of serious harm or physical restraint or abuse or threatened abuse of the legal system) or deception.

"Human Trafficking & Forced Labour laws" means the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (the "Palermo Protocol," supplementing the United Nations Convention against Transnational Organized Crime of 2000), the European Convention on Human Rights (1953), the Council of Europe Convention on Action Against Trafficking in Human Beings of 2005, the Forced Labour Convention of 1930 (No. 29) and Abolition of Forced Labour Convention of 1957 (No. 105), the EU Directive on Preventing and Combating Trafficking in Human Beings (2011/36/EU), the EU Directive Regarding Disclosure of Nonfinancial and Diversity Information (2014/95/EU), the Minimum Age Convention, 1973 (No. 138), the Worst Forms of Child Labour Convention, 1999 (No. 182), the United Nations Global Compact and laws in all countries where SMYA conducts business, that prohibit Human Trafficking and Forced Labour.

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BREACH OF THIS POLICY

All workplace participants are required to comply with this Policy at all times. If an employee breaches this Policy, they may be subject to disciplinary action. In serious cases this may include termination of employment. Agents and contractors (including temporary contractors) who are found to have breached this Policy may have their contracts with SMYA terminated or not renewed.

If a person makes an unfounded complaint or a false complaint in bad faith (e.g. making up a complaint to get someone else in trouble or making a complaint where there is no foundation for the complaint), that person may be disciplined and may be exposed to a defamation claim.

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