

1. Introduction

This Modern Slavery and Human Rights Framework sets out to explain and discuss the methodology CSE Global (Australia) Pty Ltd has taken to demonstrate our commitment to attaining a culture that fosters and promotes the human rights of our people, suppliers, customers, communities, and other stakeholders.

This Framework covers all CSE Global (Australia) business entities, which include:

CSE Crosscom Pty Ltd

CSE Uniserve Pty Ltd

CSE New Zealand Ltd

RCS Telecommunications Pty Ltd

Herein after referred to as **CSE**.

2. Why Do We Do It

Modern Slavery is a criminal offence under the *Modern Slavery Act 2018 (Cth)*. Modern Slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. CSE has a zero-tolerance approach to Modern Slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships. Furthermore, we are compelled to implement and enforce effective systems and controls to ensure Modern Slavery is not taking place anywhere within our own business or those of our supply chain.

3. Our Commitment

CSE is committed to ensuring there is transparency in our own business and in our approach to mitigating against Modern Slavery throughout our supply chain. We expect the same high standards from our contractors, subcontractors, suppliers, and other business partners.

This Framework applies to all persons working for us or on our behalf in any capacity and includes employees, directors, officers, volunteers, agents, contractors, external consultants, third-party representatives, and business partners.

4. Our Expectation

This Framework outlines the minimum ethical standards that all suppliers, including subcontractors engaged by ourselves or our suppliers, must comply with when producing and supplying goods and services to CSE.

CSE expects our suppliers to:

- Commit to complying with the minimum ethical standards outlined in this Framework, with regard to employment practices.
- Demonstrate commitment to the Framework through implementing monitoring systems to assess ethical sourcing compliance, with a focus on continual improvement.
- Ensure that corrective action is taken as a priority to rectify any breach of this policy; and
- Fully co-operate with any external audit process conducted by or on behalf of CSE.

5. Our Employees

1. CSE has implemented a minimum age policy embedded within our Recruitment Procedure which is aligned to the *United Nations Guiding Principles on Business and Human Rights* and the *International Labour Organisation Fundamental Conventions* on labour standards. This includes young person's working in hazardous conditions. The minimum age is also strongly aligned to Fair Work Australia and Employment Relations New Zealand regulations.
2. CSE ensures that working hours of all employees are aligned to applicable local laws. We strive to compensate our employees fairly and relative to the industry and local labour market. We ensure that all overtime and benefits are paid in accordance with local laws. Furthermore, employees are free to refuse to work overtime.
3. CSE provides our employees with employment contracts that they understand. Our employment contracts are fully compliant with local labour law. Our employees are free to leave the organisation without penalty in accordance with their employment contract. CSE does not financially penalise employees under any circumstances.
4. CSE's Recruitment Policy prevents us from retaining on file original documents of employees such as Passports, Birth Certificates, Visas, Driver's licences etc.
5. CSE has a Preferred Agency Register (PAR) which consists of approved recruitment and labour hire agencies we might engage from time to time, who have undergone a prequalification *Social Procurement Self-Assessment Questionnaire and Declaration*. This prequalification questionnaire ensures that our registered agencies do not withhold original documents such as Passports, Birth Certificates, Visas, Driver's Licences, etc. It prevents them from charging candidates for their services or withholding monies for services rendered from their wages, and it ensures that they uphold our minimum age policy.
6. CSE has a Bullying, Harassment and Discrimination Policy that ensures that our employees can attend work in an environment that is positive and supportive. We encourage diversity and cultural awareness across all forms including race, colour, religion, gender, age, nationality, sexual preference, disability, or any other factors prohibited by applicable laws. CSE is committed to providing a work environment that is free from all types of harassment including verbal, physical, visual, psychological, and sexual harassment.
7. CSE has a Whistle-blower Policy that provides a safe pathway for employees to discuss or lodge an issue or complaint where they will be listened to in a protected environment.
8. CSE is committed to promoting and maintaining a safe, healthy, and productive workplace, which minimises the risk of preventable accidents, injury, and exposure to health risk. We promote environmentally friendly operations and consistently look for ways to improve our health, safety, and environmental practices.
9. Where employees require accommodation in their line of work, we ensure this meets the basic needs of our employees and that they are clean, safe, and secure.
10. CSE respects that workers have the right to join a union bargain collectively. Worker representatives shall not be discriminated against.

CSE expects our suppliers, subcontractors, consultants, and business partners to adopt similar principles within their organisation as part of their own employee engagement.

6. Our Supply Chain

1. CSE has implemented a *Social Procurement Self-Assessment Questionnaire and Declaration* to be completed by our supply chain. This Questionnaire and Declaration provides CSE with the due diligence information required to understand, identify, and mitigate against Modern Slavery and Human Rights abuse within our supply chain. Our aim is to work transparently and diligently with our supply chain to work towards a global program set out by the United Nations Guiding Principles of Business and Human Rights.
2. All new suppliers and subcontractors are required to complete a *Modern Slavery Questionnaire and Declaration*, which is embedded within the new supplier and subcontractor forms. This enables us to ensure that we understand the associated risks of Modern Slavery within our supply chain before engaging with our suppliers and can work with our supply chain to mitigate against any risk.
3. CSE has a Preferred Agency Register (PAR) specifically for recruitment and labour hire agencies that we use from time to time. These agencies are required to complete the *Social Procurement Self-Assessment Questionnaire and Declaration* so to demonstrate their compliance with the *United Nations Guiding Principles in Business and Human Rights* and the *International Labour Organisation Fundamental Conventions on Labour Standards*.
4. CSE will undertake selective supply chain audits each year, whereby we will actively seek clarification and evidence that our supply chain is working towards measures that identify and mitigate against Modern Slavery and Human Rights abuse.

CSE expects our suppliers, subcontractors, consultants, and business partners to comply with our due diligence requirements and transparently work with us towards continuous improvement in the way we operate.

7. Our Principles

1. CSE financial year runs from 1st January to 31st December. Therefore, our Annual Modern Slavery Statement will be lodged prior to 30th June the following year. In accordance with the Modern Slavery Act 2018 (Cth), our Modern Slavery Statement will be tabled and ratified by the CSE Global (Australia) board prior to submission to the Department of Home Affairs.
2. CSE has a Code of Business Ethics (COBE) Policy, which is reviewed annually and distributed to all employees. CSE requires all employees to read the guidelines and complete a COBE Declaration every twelve months to identify and declare any possible conflicts of interests. Matters covered off in this policy include (but are not limited to) fraud, bribery, corruption, theft, conflicts of interest, competitor engagement, etc.
3. CSE managers, finance, procurement, and human resource teams are trained in the aspects of Modern Slavery and Human Rights to ensure that they can identify and report any suspicions.
4. All employees receive annual training on Modern Slavery and Human Rights so that they can understand how to recognise any suspicions or concerns within our own organisation, and furthermore, how to report on these.
5. Articles and information on Modern Slavery and Human Rights are shared with all employees through quarterly newsletters and the CSE SharePoint document library.

6. Modern Slavery and COBE form part of our new employee induction program, ensuring that new employees are aware of our policies and procedures relating to Modern Slavery and Human Rights abuse.
7. CSE expects that all employees who work for CSE, whether hired directly or through a third party such as labour-hire or subcontractor workers, will be treated in accordance with our Modern Slavery and Human Rights Framework.
8. CSE expects all suppliers, contractors, subcontractors, consultants, and business partners to uphold our Modern Slavery and Human Rights Framework and encourages the adoption of similar policies within their own organisations.

8. Reporting and Protection

Modern Slavery and Human Rights abuse is a serious crime and inflicts severe harm to victims.

CSE employees are encouraged to report any suspected situations to their local management or the Head of People and Culture. Who in turn will evaluate and gather the relevant information and escalate the matter if the report is found to be of legitimate concern.

External organisations are encouraged to report any suspected situations that they or CSE may be involved in Modern Slavery practices to the Head of People and Culture or the Group Commercial Manager on +61 (09) 9204 8071 or confidential@cse-australia.com.

CSE offers confidential grievance reporting through our Whistle Blower Policy, which is available internally on our SharePoint Library or externally on our website at www.cse-australia.com.

CSE does not tolerate discrimination or retaliation against any employee or person who has raised or reported an ethics concern in good faith. CSE promises to act and investigate any report that is made in such circumstances, and where suspected situations require it, will notify the Australian Federal Police.