

Human Rights and Modern Slavery Policy

Purpose

Modus Projects is committed to upholding and promoting Human Rights and eradicating Modern Slavery in all aspects of our operations. This policy outlines our commitment to integrating human rights principles into our policies, practices, and decision-making processes complying with all applicable international and national human rights standards, including but not limited to the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights the International Labour Organisation, United Nations Global Compact Principles and Modern Slavery Act 2018.

These principles and values are embedded in our Code of Conduct that every employee is requested to follow and are reflected in our commitment to the principles of the Modern Slavery Act 2018.

Background

We recognise that the building industry plays a significant role in shaping communities, economies, and societies. We acknowledge our responsibility to respect and protect the fundamental rights of individuals involved throughout our activities. We continue to work effectively to update our policy, procedures, and training programs.

Scope

This policy addresses the influence of our services, ensuring that respect, health, and safety are effectively comprehended and upheld across our operational activities and supply chain. The ambit of this policy extends to encompass the entirety of the Modus community, encompassing our diligent workforce, contracted personnel, customers, and visitors. Our robust Human Rights and Modern Slavery Due Diligence process serves as an instrumental mechanism for mitigating the most significant risks, thus guaranteeing the prevention of any encroachment upon human rights within our services.

Principles

We firmly believe that our business can thrive when human rights are embraced and upheld. Modus is unwavering in its commitment to conducting our business operations in a manner that aligns with the highest standards of legality and ethics. We hold our stakeholders in the highest esteem, fostering an environment that nurtures their deep sense of value and empowerment throughout our collaborative endeavours. It is crucial to emphasise that Modus maintains a steadfast policy of zero tolerance for any form of human rights violations, as stipulated by the Modern Slavery Act 2018 (Cth), within both our operational domain and supply chain.

Workers' Rights and Labour Practices

Our people are the essence of our company therefore, human rights are fundamental as it is part of our core values. Furthermore, this unwavering commitment extends to ensuring that our operations and supply chain processes meticulously account for considerations about health, safety, and organisational risk. In line with this commitment, we pledge to:

1. Provide equitable and competitive remuneration, encompassing leave entitlements, allowances, and superannuation contributions, while remaining fully compliant with relevant wage, working hours, overtime, and benefits legislation.
2. Sustain safe and healthy working conditions by proactively identifying and mitigating potential risks to occupational health and safety.
3. Prohibit any instances of forced labour, human trafficking, slave labour, child labour, or any form of exploitative practices.
4. Cultivate a work environment that is free from violence, harassment, intimidation, and other detrimental or disruptive conditions, originating from both internal and external sources.

By adhering to these principles, Modus endeavours to create an inclusive and responsible workplace that upholds the dignity and rights of every individual within our organisation and throughout our supply chain.

Diversity and Inclusion

We highly value and embrace diversity within our community. In alignment with our Diversity and Inclusion policy, we make a steadfast commitment to providing equal opportunities for all individuals, irrespective of their race, colour, ethnicity, national origin, gender, age, sexual orientation, disability, religion, political affiliation, or any other characteristic protected by law.

Our approach to recruitment, hiring, placement, training, compensation, and advancements at Modus is grounded in qualifications, performance, skills, and experience. Discrimination in any form is strictly prohibited within our organisation. We are resolute in our stance against harassment, disrespect, or any unequal treatment, both internally and in our interactions with stakeholders. Moreover, we actively encourage our employees to challenge discriminatory behaviour and to raise concerns without fear of retaliation.

Health and Safety

Modus provides a safe and healthy workplace and complies with applicable safety and health laws and regulations. We are dedicated to maintaining a productive workplace by minimising the risk of accidents, injury, and exposure to health risks. Our commitment to safety does not differentiate between our own employees and contractors and our suppliers' employees and contractors. We are committed to engaging with our employees to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues. We want everyone working for or with Modus to return home safely every day.

Ethical sourcing

As a building company, we recognise that our industry has been flagged as a high-risk sector for modern slavery, spanning the procurement of raw materials and the workforce involved. Our commitment goes beyond mere acknowledgment; we are dedicated to cultivating a culture within our organisation that deeply values and respects human rights.

In alignment with this commitment, we actively engage in monitoring the extent of modern slavery risks within our supply chain. This involves ongoing efforts to assess, address, and eliminate such risks collaboratively with our suppliers. We understand the importance of accountability and take it upon ourselves to ensure that our supply chain operates in full alignment with our human rights commitments. We commit to:

1. Assess and monitor our suppliers and subcontractors to identify and address modern slavery and human rights risks.
2. Promote responsible sourcing practices, ensuring that our suppliers uphold human rights standards, and encouraging them to implement similar policies within their operations.
3. Implement measures to prevent and eradicate modern slavery and continuously improve our systems and practices.

Due Diligence Processes

As part of our due diligence, we expect our suppliers to operate following all applicable Modern Slavery Laws including, but not limited to, those protecting against Human Trafficking, Child Labour, and Modern Slavery. At Modus, we undertake a series of steps to mitigate and manage the risk of breaches of Modern Slavery that may arise within our supply chain:

1. Assess the potential modern slavery risks in our operations and supply chains.
2. Develop and review company policies on modern slavery in operations and supply chains.

3. Develop and implement training programs for staff in modern slavery.
4. Prepare to conduct due diligence on local and global supply chains (where applicable).
5. Take steps to address any potential modern slavery risks identified.
6. If evidence is found of human trafficking, slavery-like practices, or child labour at a prospective supplier, they will be disqualified and shared with relevant government agencies to act in this matter.
7. Set up a program to measure effectiveness through performance monitoring.

Grievance Mechanisms and Remediation

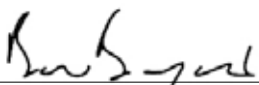
We believe that a transparency process is a key component to providing remediation. We are committed to maintaining effective grievance mechanisms to address and resolve human rights concerns. We will provide accessible and confidential channels for reporting grievances, ensuring that complainants are protected against retaliation. We will investigate reported issues promptly, take appropriate corrective actions, provide remedies to affected individuals or communities, as appropriate and remain active throughout our dialogue with stakeholders.

Monitoring and Reporting

We will regularly monitor our performance to ensure compliance with this Human Rights and Modern Slavery Policy. We will conduct periodic assessments, audits, and reviews to identify areas for improvement. Furthermore, we will provide regular reports on our human rights performance, both internally and externally, ensuring transparency and accountability.

We recognise that respecting and promoting human rights is an ongoing process. We will continually improve our policies, practices, and performance by learning from our experiences, engaging with stakeholders, and integrating human rights.

This policy is endorsed by the Directors of Modus Projects and will be reviewed annually.



Brad Berryman
08/11/2023



Troy Mayne
08/11/2023