



Ethical Sourcing and Modern Slavery Policy

This Ethical Sourcing and Modern Slavery Policy applies to all Employees of the business.

The objective of the policy is to outline our commitment to conducting business in an ethical and responsible manner.

The requirement is for all staff to comply with Ethical Sourcing and Modern Slavery Policy.

Procedures (not required)



Purpose

The purpose of this policy is to outline NGROO Education Aboriginal Corporation

's commitment to conducting business in an ethical and responsible manner. This policy aims to ensure that our supply chain and business practices are free from modern slavery, human trafficking, forced labour, and any other forms of exploitation, in compliance with the Australian *Modern Slavery Act 2018*.

Objective

The objectives of the policy are to:

- Establish clear guidelines for ethical sourcing and procurement practices within the company.
- Promote transparency and accountability within our supply chain and business operations.
- Uphold human rights and labour standards, in accordance with national and international laws and regulations.
- Identify and mitigate the risk of modern slavery in our supply chain and business practices.
- Foster a culture of responsibility and ethical conduct within our organisation.

Policy Requirements

1. Supplier due diligence and selection:

- a. NGROO Education Aboriginal Corporation
- b. shall conduct a thorough assessment of potential suppliers, evaluating their labour practices and adherence to ethical sourcing principles.
- c. Suppliers must comply with all applicable national and international laws and regulations, including those relating to human rights, labour standards, and modern slavery.
- d. Suppliers shall be required to provide evidence of their compliance with this policy and their commitment to ethical business practices.

2. Supplier contracts:

- a. All supplier contracts must include clauses that explicitly prohibit the use of modern slavery, forced labour, child labour, and any other forms of exploitation.
- b. Suppliers must agree to allow NGROO Education Aboriginal Corporation
- c. or a designated third party to conduct periodic audits and inspections of their facilities and records to ensure compliance with this policy.
- d. Failure to comply with the terms of this policy may result in the termination of the supplier relationship.

3. Risk assessment and management:

- a. NGROO Education Aboriginal Corporation



- b. shall regularly conduct risk assessments of our supply chain and business operations to identify and address any potential risks related to modern slavery or unethical practices.
- c. The company will implement appropriate risk mitigation measures and monitor their effectiveness.
- d. Any identified instances of non-compliance or potential risks must be reported to management for further investigation and action.

4. Training and awareness:

- a. NGROO Education Aboriginal Corporation
- b. shall provide regular training and resources to all employees involved in procurement, supply chain management, and other relevant roles, ensuring they are aware of their responsibilities under this policy.
- c. Employees are encouraged to report any concerns or suspicions of modern slavery, human trafficking, or unethical practices within the supply chain or business operations.

5. Reporting and remediation:

- a. NGROO Education Aboriginal Corporation
- b. is committed to maintaining open channels of communication for employees and external stakeholders to report concerns or allegations related to modern slavery or unethical practices.
- c. All reports will be treated confidentially and investigated promptly. Appropriate remedial action will be taken based on the findings of the investigation.
- d. The company will report annually on its efforts to address modern slavery in its supply chain and business operations, as required under the Australian *Modern Slavery Act 2018*.

By adhering to the Ethical Sourcing and Modern Slavery Policy, NGROO Education Aboriginal Corporation

demonstrates its commitment to conducting business in a responsible and ethical manner, upholding human rights, and promoting fair labour practices throughout our supply chain and operations.

The Director is responsible for communicating the Ethical Sourcing and Modern Slavery Policy to all persons working for or on behalf of the organisation and making it available to interested parties.