

ONEPOINT HUMAN RIGHTS, ETHICAL LABOUR & MODERN SLAVERY POLICY

Organisation: OnePoint
Policy Owner: Managing Director
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1. Purpose

OnePoint is committed to conducting business ethically, responsibly and in a manner that respects internationally recognised human rights and labour standards.

OnePoint has zero tolerance for modern slavery, forced labour, human trafficking, unlawful child labour, the worst forms of child labour, exploitative recruitment practices, discrimination and other serious abuses of workers' fundamental rights.

This Policy establishes minimum standards applying to OnePoint, its employees, workers, contractors, agents, recruiters and, where relevant, suppliers and other business partners.

Where local legislation provides a higher level of worker protection than this Policy, the local legislation must be followed. Where this Policy or recognised international standards provide a higher standard without conflicting with applicable law, OnePoint expects the higher ethical standard to be applied.

2. Legal and International Framework

This Policy has been developed having regard to applicable Australian legislation and internationally recognised human rights and labour principles, including where relevant:

Australian Framework

- **Modern Slavery Act 2018 (Cth)**
- **Criminal Code Act 1995 (Cth)**, including offences relating to slavery, servitude, forced labour, deceptive recruiting and trafficking in persons
- **Fair Work Act 2009 (Cth)**
- **Fair Work Regulations 2009 (Cth)**
- **Work Health and Safety Act 2011** and corresponding State and Territory WHS legislation
- **Age Discrimination Act 2004 (Cth)**

- **Disability Discrimination Act 1992 (Cth)**
- **Racial Discrimination Act 1975 (Cth)**
- **Sex Discrimination Act 1984 (Cth)**
- applicable State and Territory anti-discrimination, child employment, workplace relations and work health and safety legislation.

International Framework

OnePoint also has regard to:

- **United Nations Universal Declaration of Human Rights**
- **United Nations Guiding Principles on Business and Human Rights**
- **ILO Declaration on Fundamental Principles and Rights at Work**
- **ILO Forced Labour Convention, 1930 (No. 29)**
- **ILO Abolition of Forced Labour Convention, 1957 (No. 105)**
- **ILO Minimum Age Convention, 1973 (No. 138)**
- **ILO Worst Forms of Child Labour Convention, 1999 (No. 182)**
- **ILO Equal Remuneration Convention, 1951 (No. 100)**
- **ILO Discrimination (Employment and Occupation) Convention, 1958 (No. 111)**
- **ILO Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)**
- **ILO Right to Organise and Collective Bargaining Convention, 1949 (No. 98)**
- **ILO General Principles and Operational Guidelines for Fair Recruitment**
- other applicable international human rights and labour standards.

3. Scope

This Policy applies to:

- all OnePoint directors and officers;
- employees and workers;
- contractors and consultants;
- labour-hire personnel;
- recruitment agencies and recruiters acting on OnePoint's behalf;
- agents and representatives; and
- suppliers and subcontractors where relevant to OnePoint's supply chain.

OnePoint expects suppliers and business partners to maintain standards consistent with the principles contained in this Policy.

4. Prohibition of Modern Slavery, Forced Labour and Human Trafficking

OnePoint expressly prohibits all forms of modern slavery.

No worker, contractor, agent, recruiter, supplier or person acting on behalf of OnePoint may engage in, facilitate, knowingly benefit from or tolerate:

- slavery or slavery-like practices;
- servitude;
- forced or compulsory labour;
- debt bondage;
- bonded labour;
- human trafficking;
- deceptive recruitment;
- forced marriage connected with labour exploitation;
- coercion or threats designed to compel a person to work;
- restriction of a worker's freedom of movement; or
- any other conduct amounting to modern slavery under applicable law.

Employment and work must be entered into voluntarily and workers must remain free to leave their employment subject only to reasonable notice requirements permitted by applicable law or collective agreement.

5. Prohibition of Child Labour

OnePoint prohibits unlawful child labour throughout its operations and expects the same standard throughout its supply chain.

No person may be employed below:

1. the applicable legal minimum working age in the country where the work is performed;
2. the age for completion of compulsory schooling; or
3. where consistent with applicable law, the internationally recognised general minimum employment age of 15,

whichever provides the appropriate higher protection to the child.

Legitimate work experience, vocational education, apprenticeships and lawful employment of young persons may only occur where permitted by applicable law and where the work does not interfere with education or compromise the person's health, safety, development or wellbeing.

6. Worst Forms of Child Labour

OnePoint maintains an absolute prohibition on the worst forms of child labour.

No person under 18 may be engaged in:

- slavery, trafficking, debt bondage, forced or compulsory labour;
- commercial sexual exploitation;
- pornography or pornographic performances;
- illicit activities including the production or trafficking of illegal drugs;
- hazardous work;
- work exposing them to physical, psychological or sexual abuse;
- dangerous machinery, substances or environments;
- dangerous heights, confined spaces or other inherently hazardous environments;
- unreasonable confinement;
- work involving excessive hours;
- inappropriate night work; or
- any work likely to jeopardise their health, safety, morals, education or physical or psychological development.

These requirements reflect the principles of ILO Convention No. 182 and Recommendation No. 190.

7. Worker Identity and Immigration Documents

Workers must retain possession and control of their passports, identity documents, immigration documents, visas, work permits and other personal documentation.

OnePoint employees, recruiters, agents and suppliers must not:

- confiscate;
- destroy;
- conceal;
- retain;
- deny access to; or
- otherwise restrict a worker's possession or use of these documents.

Where documents are temporarily required for legitimate administrative or legal purposes, they must be returned promptly and the worker must have reasonable access to them.

Documents may only be retained where specifically required by law and never as a means of restricting a worker's freedom of movement or ability to leave employment.

8. Equal Opportunity and Non-Discrimination

OnePoint is committed to equality of opportunity and a workplace free from unlawful discrimination, harassment and victimisation.

Employment decisions including recruitment, remuneration, promotion, training, work allocation, performance management and termination must be based on legitimate and lawful business considerations and must not involve unlawful discrimination based on attributes including:

- race;
- colour;
- sex;
- gender;
- sexual orientation;
- age;
- disability;
- HIV/AIDS status where protected by applicable disability or anti-discrimination legislation;
- religion;
- political opinion;
- national extraction or national origin;
- nationality;
- marital or relationship status;
- pregnancy;
- family or carer's responsibilities;
- social origin;
- trade union membership;
- participation or non-participation in lawful industrial activities; or
- any other characteristic protected under applicable law.

Retaliation against a person for exercising a lawful workplace or human right is prohibited.

9. Recruitment Fees and Related Costs

Workers and prospective workers must not be charged recruitment fees or related costs as a condition of obtaining employment with OnePoint.

Recruitment agencies, labour providers, agents and other intermediaries acting on OnePoint's behalf must not directly or indirectly charge workers prohibited recruitment fees.

Where OnePoint becomes aware that a worker has improperly paid a recruitment fee or related cost to obtain employment connected with OnePoint, the circumstances must be investigated and appropriate remediation considered.

Recruitment arrangements must be transparent, ethical and consistent with applicable law and recognised ILO fair recruitment principles.

10. Commercial Sexual Exploitation and Procurement of Commercial Sex

OnePoint prohibits its workers and agents from using their position, company funds, company resources, business travel, accommodation or business relationships to procure commercial sexual services in connection with the performance of work or a OnePoint contract.

The prohibition is absolute where the conduct:

- involves a person under 18;
- involves human trafficking, coercion, exploitation or forced prostitution;
- breaches local law;
- involves the use of company funds or resources; or
- is associated with the performance of contractual duties or business travel.

No employee, contractor or agent may facilitate sexual exploitation or trafficking under any circumstances.

11. Supplier Modern Slavery Risk Assessment

OnePoint will apply a risk-based approach to modern slavery within its supply chain.

Before onboarding a supplier considered to present a material modern slavery or human-rights risk, OnePoint may require the supplier to complete an appropriate modern slavery and human-rights risk assessment.

Relevant suppliers will be assessed having regard to factors including:

- country risk;
- industry and sector risk;
- use of migrant, temporary or low-skilled labour;
- labour-hire arrangements;
- subcontracting;
- recruitment practices;
- manufacturing or sourcing locations;
- previous human-rights concerns; and
- other recognised modern slavery risk indicators.

Material or higher-risk suppliers will be reassessed **at least annually** as part of OnePoint's ongoing supplier governance process.

OnePoint reserves the right to request supporting documentation, require corrective action, conduct further due diligence or discontinue a supplier relationship where significant unresolved modern slavery risks exist.

12. Worker Accommodation and Housing

Where OnePoint or an agent or supplier acting on OnePoint's behalf provides or arranges worker accommodation, that accommodation must:

- comply with applicable host-country housing, building, health and safety requirements;
- be structurally safe;
- provide reasonable security;
- provide appropriate sanitation and hygiene facilities;
- provide access to potable water;
- have appropriate emergency and fire-safety arrangements;
- respect workers' privacy and dignity; and
- not be used to unreasonably restrict workers' freedom of movement.

Workers must not be compelled to live in employer-controlled accommodation unless legitimately required by the nature of the work and permitted by law.

13. Freedom to Terminate Employment

All workers, including migrant workers, must be free to terminate their employment.

A worker must not be subjected to:

- financial penalties designed to prevent resignation;
- threats;
- coercion;
- confiscation of documents;
- withholding of wages;
- unlawful withholding of accrued entitlements; or
- other measures intended to prevent the worker from leaving employment.

Workers remain subject to reasonable notice requirements under their employment contract, applicable law or collective agreement.

Nothing in this Policy prevents OnePoint from enforcing legitimate contractual rights permitted by applicable law, provided those rights do not constitute coercion, forced labour or an unreasonable barrier to leaving employment.

14. Wages and Employment Entitlements

OnePoint requires workers to be paid fairly, accurately and lawfully.

Wages, overtime, allowances, leave, superannuation or equivalent benefits and other employment entitlements must meet or exceed applicable host-country legal requirements.

Where no statutory minimum wage exists, remuneration should be aligned with applicable collective agreements or prevailing sector and market wages appropriate to the work performed.

Wages must:

- be paid regularly;
- be paid directly to the worker or their authorised account;
- be accompanied by appropriate wage information or payslips where required;
- not be subject to unlawful deductions; and
- not be withheld as a means of coercion or discipline.

15. Freedom of Association and Collective Bargaining

OnePoint respects workers' lawful rights to:

- form and join trade unions or worker organisations of their own choosing;

- choose not to join such organisations;
- participate in lawful industrial activities;
- bargain collectively;
- select worker representatives; and
- engage in peaceful assembly,

in accordance with applicable local law.

No worker will be unlawfully discriminated against, intimidated, dismissed or otherwise disadvantaged because of lawful trade union membership, non-membership, representation or industrial activity.

Where local laws restrict freedom of association, OnePoint will seek to respect lawful alternative mechanisms for worker representation and dialogue.

16. Employment Agreements and Recruitment Transparency

Workers, including workers engaged through recruiters, must receive accurate information concerning the material terms and conditions of their employment before commencing work.

Employment documentation should clearly communicate, as applicable:

- employer identity;
- position and duties;
- workplace or location;
- remuneration;
- ordinary working hours;
- overtime arrangements;
- leave entitlements;
- benefits;
- deductions;
- duration of employment;
- termination and notice provisions; and
- other material employment conditions.

Where relocation is required, relevant employment information must be provided before relocation occurs.

For migrant workers or workers who do not adequately understand the primary language used in the workplace, material employment terms must be provided or explained in a language the worker understands.

Contract substitution, deceptive recruitment and material misrepresentation of employment conditions are prohibited.

17. Right-to-Work and Age Verification

Before a person begins work, OnePoint or its authorised representative must undertake appropriate checks to establish:

- the person's identity;
- their legal right to work;
- any relevant visa or work authorisation requirements;
- their age where necessary; and
- compliance with applicable employment and child-labour requirements.

Proof-of-age documentation must be obtained where there is reasonable doubt regarding whether a worker meets applicable minimum-age requirements.

Documents must be handled securely, confidentially and in accordance with applicable privacy requirements.

The verification process must never be used as a justification for permanently withholding an employee's original identity or immigration documents.

18. Working Hours and Health and Safety

Working hours, rest periods and overtime must comply with applicable legislation, awards, enterprise agreements and employment contracts.

OnePoint does not support working practices involving excessive or unsafe hours.

Particular care must be taken where young workers are lawfully employed to ensure their work does not:

- interfere with compulsory education;
- involve prohibited night work;
- expose them to hazardous environments;
- involve unreasonable hours; or

- jeopardise their physical or psychological health.

OnePoint is committed to providing and maintaining a safe and healthy working environment consistent with applicable work health and safety legislation.

19. Supplier and Contractor Expectations

Suppliers, subcontractors, recruiters and other relevant business partners are expected to:

1. comply with applicable employment, human-rights and modern slavery laws;
2. prohibit forced labour and human trafficking;
3. prohibit unlawful child labour and the worst forms of child labour;
4. ensure ethical recruitment;
5. not charge prohibited recruitment fees to workers;
6. respect workers' freedom of movement;
7. not unlawfully retain identity documents;
8. provide lawful wages and working conditions;
9. prevent unlawful discrimination;
10. respect lawful freedom of association;
11. maintain safe working conditions; and
12. cooperate with reasonable OnePoint due-diligence and remediation requirements.

Serious or repeated breaches may result in corrective-action requirements, suspension, non-renewal or termination of the commercial relationship, subject to contractual and legal requirements.

20. Reporting Concerns

Employees, contractors, suppliers and other stakeholders are encouraged to report suspected breaches of this Policy.

Concerns may include suspected:

- forced labour;
- human trafficking;
- child labour;
- worker exploitation;
- document confiscation;
- recruitment fees;

- discriminatory practices;
- unsafe accommodation;
- wage violations; or
- retaliation against workers exercising their rights.

Reports should be made to:

Managing Director / Authorised Officer

Email: kerim@1pt.com.au

Alternative reporting channel: jodi@1pt.com.au

Reports will be handled seriously, sensitively and, where practicable, confidentially.

Retaliation against a person who raises a genuine concern in good faith is prohibited.

21. Investigation and Remediation

Where a potential breach is identified, OnePoint will assess the matter and determine an appropriate response having regard to:

- severity;
- affected workers;
- applicable legislation;
- OnePoint's involvement or connection to the issue;
- immediate risks to individuals;
- remediation opportunities; and
- whether regulatory or law-enforcement notification is required.

Where modern slavery or serious worker exploitation is suspected, the priority will be the safety and wellbeing of affected individuals.

OnePoint recognises that immediately terminating a supplier relationship may sometimes increase harm to affected workers. Where appropriate and lawful, remediation and corrective action may therefore be pursued before termination.

22. Training and Awareness

Relevant OnePoint personnel responsible for:

- recruitment;
- procurement;

- supplier management;
- human resources;
- contracting; or
- management of offshore or international workers

should receive appropriate awareness or training concerning this Policy and relevant modern slavery and worker-exploitation risks.

23. Monitoring and Annual Review

This Policy will be reviewed at least annually, or earlier where:

- relevant legislation changes;
- OnePoint enters a materially different jurisdiction or supply chain;
- significant modern slavery or human-rights risks are identified; or
- a material incident indicates that the Policy requires amendment.

Supplier modern slavery assessments will form part of OnePoint's ongoing risk-management framework, with higher-risk suppliers subject to enhanced monitoring.

24. Accountability

Compliance with this Policy is a condition of acting on behalf of OnePoint where incorporated into the relevant employment, contractor, agency or supplier arrangements.

A serious breach may result in:

- disciplinary action;
- termination of employment or engagement;
- corrective action;
- supplier remediation requirements;
- suspension or termination of a supplier relationship; and/or
- referral to appropriate authorities where required.

25. Policy Commitment

OnePoint recognises that responsible business practice extends beyond minimum legal compliance.

We are committed to respecting human dignity, protecting fundamental labour rights, preventing exploitation and continually improving the transparency and integrity of our operations and supply chain.

OnePoint expects the same commitment from the employees, contractors, agents, recruiters, suppliers and business partners with whom we work.

Approved by: Kerim EL Gabaili
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Position: Managing Director
Date: 1/3/26

Next Review Date: 1/3/27