



Modern Slavery Policy

Last Updated: 20 March 2023



Purpose

Think Pacific has a zero-tolerance approach to Modern Slavery within its business and supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place in its own business or in any of its supply chain.

This policy sets out Think Pacific's commitment to reducing the risk of modern slavery practices within our supply chains and operations. It is consistent with our Ethical Framework that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations.

This Policy supports the intent of international conventions, treaties and protocols relevant to combating modern slavery and the Modern Slavery Act (Cth) 2018

Context

Think Pacific values human rights and is committed to ensuring that all operations are conducted according to ethical, professional and legal standards in a fair, honest and open manner. It is vital for us to maintain this reputation as a leader in ethical global programmes and best practice for international student education.

Modern Slavery (as defined in Divisions 270 and 271 of the Criminal Code 1995 (Cth) (Modern Slavery) is a crime and a violation of fundamental human rights. It takes various forms, such as:

- slavery: one person treats another as though he or she owns that person and that person is deprived of his or her freedom.
- servitude: a person is coerced to provide services, is forced to live on another person's property and cannot change his or her condition.
- forced labour: a person is forced to involuntarily work or to provide a service without remuneration under the menace of a penalty.
- trafficking in persons (including trafficking of orphanage children): a person arranges or facilitates the travel of another person to be exploited, without that person's knowledge

or consent. This can be even where the person consents to the travel as they may have been deceived or unduly influenced.

- forced marriage: a person enters into a marriage without freely and fully consenting, because he or she was coerced, threatened or deceived or otherwise incapable of understanding the nature and effect of the marriage ceremony.

In addition, the definition of "modern slavery" in the Modern Slavery Act 2018 (Cth) (Modern Slavery Act) includes:

- child labour: children below 12 years of age undertaking at least one hour of economic activity or 28 hours of domestic work or children aged between 12 and 14 years of age undertaking at least 14 hours of economic activity or 42 hours of domestic work and economic activity combined.
- debt bondage: a person's pledge of labour or services as security for the repayment of a debt or other obligation, but there is no hope of actually repaying the debt. The services required to repay the debt, or the time in which to repay the debt, may be undefined.
- other slavery-like practices.

The Modern Slavery Act applies to all Think Pacific operations and its supply chain.

This document is directed to assisting Think Pacific to comply with its obligations under the Modern Slavery Act and reducing the modern slavery risks posed to its business and its supply chain.

Scope

This Anti-Slavery Policy (Policy) applies to all directors, officers, employees, volunteers and interns of Think Pacific. This Policy should also be read in conjunction with the Think Pacific Code of Conduct which serves as a guide for how to conduct yourself as a member of the Think Pacific team. It is critical that you comply with the obligations set out in this document. Modern Slavery can cause genuine and significant harm to the individuals if Modern Slavery risks are not properly detected and addressed.

This document sets out important information as to the steps that Think Pacific will take in response to identifying a Modern Slavery risk. You must familiarise yourself with this document



to assist Think Pacific in effectively carrying out its duties in compliance with the Modern Slavery Act.

Ethical Standards Officer

Our Ethical Standards Officer is responsible for the administration and maintenance of this Policy. Our Ethical Standards Officer also has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, auditing internal control systems and procedures to ensure they are effective in countering Modern Slavery.

The Ethical Standards Officer is entitled to call upon any resources that he or she considers necessary to assist the Ethical Standards Officer in the performance of their role. Contact details for the Ethical Standards Officer and other Disclosure Officers are listed at the end of this Policy Document.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given appropriate training on it and the issue of Modern Slavery in supply chain.

This document will be reviewed on an annual basis or when required as a result of relevant legislative amendments, changes to regulatory guidance, relevant court decisions or as a result of the identification of improvement opportunities during the course of a post-incident review. All employees will be made aware of this document and key personnel will be provided with sufficient training so as to enable them to fulfil the role(s) which are relevant to them.

A copy of this document is hosted within Think Pacific's online portal for partners and staff of educational institutions and also provided to our students within their online portal and onboarding information.

Policy Statement

Think Pacific prohibits all forms of Modern Slavery and seeks to educate and influence its employee, partners and suppliers to ensure that no form of Modern Slavery is taking place in its own operations or in its supply chain.

Think Pacific employees, contractors, subcontractors, vendors, suppliers, partners, representatives, agents and others through whom Think Pacific conducts business must not



engage in any practice that constitutes any form of Modern Slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking
- Using forced labour in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment or offering of employment/contract positions to candidates; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs, any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place.
- Charging job applicants / candidates recruitment fees.
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country's housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

Think Pacific is committed to the Policy and has put measures in place that are designed to prevent and detect Modern Slavery in our business and our supply chain. The Think Pacific programme in this regard contains the following elements:

1. A policy which articulates the commitment of Think Pacific to prevent violations of the Modern Slavery Act and the Modern Slavery offences within the Criminal Code 1995 (Cth) within its operations and supply chain, being this Policy.
2. Communication of this Policy and all relevant elements of the programme to all employees throughout Think Pacific and to our business partners and supply chain.

3. The assessment of Modern Slavery risks within Think Pacific operations and supply chain and the development of effective, efficient and transparent controls to reduce exposure to those risks.
4. The adoption of anti-slavery requirements in contracts.
5. The conduct of appropriate due diligence on business partners, agents, contractors, consultants, subcontractors and suppliers coupled with a requirement that they implement procedures which incorporate the principles of the Modern Slavery Act.
6. Training of all relevant individuals throughout Think Pacific and Think Pacific Foundation (Fiji) so that compliance with this Policy is the duty of all relevant employees at all levels and so that individuals can recognise Modern Slavery practices and take steps to avoid the same.
7. Think Pacific ensures there is transparency in our own business operations and in our approach to tackling Modern Slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act.
8. Think Pacific provides safe and fair working conditions for all its employees and ensures that no child labour is employed, in line with minimum age laws, within all countries that it operates. Think Pacific expects the same standards from all of its contractors, suppliers and other business partners and, as part of its contracting processes, includes specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children and we expect that our suppliers will hold their own suppliers to the same standards.
9. The Ethical Standards Officer will report to the Board of Directors at least annually on the measures to prevent and detect Modern Slavery in its business operations and supply chain.
10. The Board of Directors commits to publishing a public statement annually, setting out the steps it has taken during that particular financial year to ensure that Modern Slavery is not taking place in any of our supply chain or within our own business.



Investigations and Audits

Think Pacific will perform investigations and internal or external audits to verify that business is being conducted in compliance with this Policy.

All of Think Pacific's employees and third parties are required to fully and promptly cooperate with the internal and external auditors and investigators of GWA, and must respond fully and truthfully to their questions, requests for information, and documents. Any failure by an employee to completely cooperate, or any action to hinder an investigation or audit, including for example, hiding or destroying any information or documentation, providing false answers or false information, or deleting emails or other documents, may be grounds for disciplinary action, up to and including termination, subject to applicable law.

Reporting

Internal reporting is critical to the success of Think Pacific and it is both expected and valued. You are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that you become aware of. Complaints will be kept confidential and will be dealt with sensitively and appropriately.

If you believe that a breach of this Policy has occurred or is likely to occur, you must notify your manager and the Think Pacific Ethical Standards Officer or the other Disclosure Officers as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of a Think Pacific supply chain constitutes any of the various forms of Modern Slavery, your query should be raised with your manager and the Think Pacific Ethical Standards Officer.

Think Pacific aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if those concerns turn out to be mistaken. Think Pacific is committed to ensuring staff do not suffer any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery of whatever form is or may be taking place in any part of our business or in any of our supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Think Pacific Ethical Standards Officer or the other Disclosure Officers immediately.



Breaches of this Policy

The Ethical Standards Officer will arrange an investigation into reported breaches of this Policy. The investigation may utilise internal and external resources that the Ethical Standards Officer considers necessary. The outcome of the investigation including recommended actions will be reported to the Executive Leadership Team with material matters reported to the Board of Directors.

When confronted with a potential Modern Slavery incident or risk, the Ethical Standards Officer should consider whether the incident or risk may give rise to obligations under Think Pacific's Crisis Management and Business Continuity Plans.

Any employee who breaches this Policy by engaging in or conspiring to engage in any Modern Slavery conduct will face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and, if warranted, legal proceedings may be brought against the employee.

Think Pacific may terminate its relationship with individuals, organisations and suppliers working on its behalf or engaged by it if they breach this Policy.

Key Contacts

If you have any questions about this Policy please contact the Ethical Standards Officer or the other Disclosure Officers. The key contact details are outlined below:

Ethical Standards Officer

Simon Darker
Director
Tel: 07595437797
Email: simon@thinkpacific.com

Other Disclosure Officers

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