

Modern Slavery Policy and Code of Conduct

1. Introduction

VooDu Marketing is committed to preventing modern slavery in all aspects of our business operations and supply chain. We recognize that modern slavery, including forced labour, human trafficking, debt bondage, and other forms of exploitation, is a serious violation of human rights. As a responsible multichannel and promotional marketing agency, we understand the importance of ethical sourcing, fair labour practices, and corporate accountability. This policy outlines our commitment to ensuring ethical labour practices and upholding human rights across our business and supplier relationships.

While we are not a reporting entity under the Australian Modern Slavery Act 2018 (or any other current or proposed legislation) we are committed to working towards assessing and addressing the risks of modern slavery in our supply chain by empowering and educating our staff and suppliers.



2. Objectives

- Identify, prevent, and mitigate modern slavery risks within our business operations and supply chain.
- Comply with relevant legislation, including alignment with Modern Slavery Act 2018 (Cth) and applicable state and international laws.
- Promote transparency, ethical sourcing, and accountability in our business relationships.
- Educate employees, suppliers, and business partners on modern slavery risks and best practices.
- Establish clear processes for reporting, investigating, and addressing modern slavery concerns.
- Continuously improve our policies and procedures to detect, prevent, and address modern slavery risks.
- Support industry initiatives and advocacy efforts aimed at eliminating modern slavery and human trafficking.

3. Scope

This policy applies to all employees, contractors, business partners, and suppliers engaged with VooDu Marketing. It extends across all levels of our supply chain, from sourcing promotional and merchandise products and materials to logistics, distribution, and service delivery. We expect all business partners, including manufacturers, wholesalers, logistics providers, and subcontractors, to uphold our commitment to ethical labour practices.

4. Commitments & Principles

4.1 Ethical Employment Practices

- Ensure fair wages, safe working conditions, and respect for workers' rights across all business operations.
- Prohibit the use of forced labour, child labour, bonded labour, deceptive recruitment, or any form of exploitation.
- Provide employees with clear contracts outlining their rights, responsibilities, and terms of employment.
- Encourage freedom of association and collective bargaining rights for all workers.
- Ensure equal employment opportunities and prevent workplace discrimination.
- Conduct regular employee well-being check-ins to identify and address labour concerns.
- Promote ethical recruitment practices, ensuring workers are not charged recruitment fees or placed in debt bondage.
- Prevent excessive working hours and ensure compliance with local labour laws regarding working hours, rest periods, and overtime compensation.

4.2 Supply Chain Due Diligence

VooDu Marketing undertakes due diligence when considering engaging new suppliers or continuing business with existing suppliers:

- Conduct risk assessments to identify potential modern slavery risks within our supply chain.
- Each supplier will be provided the VooDu Marketing Modern Slavery Policy and Code of Conduct document(s). They will also be provided the Modern Slavery Questionnaire. Both of these documents will need to be completed and signed off by the supplier.
- Reviewing supplier bases, understanding our supply chains with a view of identifying high risk categories/areas.
- Update companywide policies, contracts and starting internal communication and education processes.
- Evaluating modern slavery risks through the completion of "modern slavery supplier questionnaire."
- Engage only with suppliers and business partners that comply with ethical sourcing standards.
- Require suppliers to comply with our Modern Slavery Policy and provide transparency regarding their own labour practices.
- Include modern slavery clauses in supplier contracts to ensure adherence to ethical labour practices.
- Where possible, implement supplier audits and inspections to verify compliance with labour laws and human rights standards.
- Utilise the Supplier Code of Conduct outlining ethical expectations, labour rights, and human rights compliance.
- Work with suppliers to develop corrective action plans where risks of modern slavery are identified.
- Prioritize working with Fair Trade and ethically certified suppliers to ensure responsible sourcing.
- Work with suppliers to map their own supply chains and provide transparency regarding subcontractors and material sourcing.

4.3 Reporting & Whistleblower Protection

- Utilise the confidential reporting mechanisms for employees, suppliers, and business partners to report concerns about unethical labour practices.
- We will ensure whistleblower protection so that anyone reporting modern slavery concerns is protected from retaliation.
- Investigate all reports thoroughly, with appropriate remediation plans where required.
- Take immediate corrective action if instances of modern slavery are identified, including termination of non-compliant supplier relationships.
- Ensure stakeholder engagement in identifying and resolving modern slavery issues.
- All suspected cases of modern slavery should be reported. Employees can report to the Sourcing Manager, their Direct Manager, the Compliance Officer, or Human Resources.

- We encourage and support employees in raising genuine concerns about modern slavery and labour issues, whether they identify them or are affected by them in the workplace.
- We urge our personnel and suppliers to report any signs indicating a risk of potential or actual occurrence of modern slavery within our supply chain activities, operations, or those of our suppliers or third parties.

VooDu Marketing is committed to ensuring that employees can voice their concerns without fear of negative impacts on their future employment prospects.

5. Training & Awareness

- Provide modern slavery training to employees, particularly those involved in procurement, human resources, and supplier management.
- Educate suppliers and business partners on modern slavery risks and best practices for ethical labour sourcing.
- Share guidelines, toolkits, and resources to help employees and stakeholders identify modern slavery indicators.
- Incorporate modern slavery awareness into onboarding programs for new employees and suppliers.
- Raise awareness about global modern slavery challenges and encourage participation in human rights initiatives.

6. Compliance & Continuous Improvement

- Comply with relevant legislation and align with the Modern Slavery Act 2018 (Cth) and other relevant legal requirements.
- Review and update our policies and practices annually to address emerging risks.
- Establish key performance indicators (KPIs) to measure the effectiveness of our modern slavery risk management.
- Conduct regular due diligence assessments of high-risk suppliers and business partners.
- Encourage feedback from employees, suppliers, and stakeholders to improve our modern slavery approach.
- VooDu Marketing's operations comply with the United Nations International Labour Organization Convention's prohibition on child labour and minimum age for work. Suppliers shall not employ any person under the age of 15 in accordance with developing International Labour Organization Convention 138.

7. Governance & Accountability

- Assign responsibility for modern slavery compliance to senior management and appoint a modern slavery Compliance Officer.
- Where possible, conduct internal and external audits to ensure compliance with modern slavery laws and ethical sourcing practices.

- Foster a culture of ethical business practices and social responsibility at all levels of the organization.
- Implement and support a grievance mechanism to allow workers in our supply chain to report violations anonymously.

8. Partnerships & Advocacy

- Advocate for stronger industry standards and promote ethical business practices within the merchandise and promotional marketing sector.
- Participate in industry-wide initiatives that seek to eliminate forced labour and exploitation.
- Support charities and initiatives that aid victims of modern slavery.
- Engage with ethical certification bodies to improve supply chain transparency.

9. Code of Conduct

VooDu Marketing has a zero-tolerance approach to all forms of modern slavery within our business, and within our supply chain. VooDu Marketing is committed to acting ethically and with integrity in all business relationships by implementing effective policies and controls to ensure modern slavery is not taking place in our own business or in any of our supply chains. VooDu Marketing undertakes due diligence when considering engaging new suppliers or continuing business with existing suppliers.

Should VooDu Marketing Pty Ltd become aware that any supplier does not meet the Modern Slavery Supplier Code of Conduct, we will engage directly with the supplier and develop an action plan to eradicate the practice in a transparent, timely and efficient manner. Should the supplier be uncooperative, the appropriate action will be taken, including terminating the business relationship, if necessary, by VooDu Marketing.

9.1 Dealing with Suppliers

At the onset of a business relationship, we must provide all suppliers with communications detailing the VooDu Marketing stance on Modern Slavery Policy, Code of Conduct and ethical business practices. We require that every supplier adheres and signs off to the specified guidelines addressing Modern Slavery risks.

- Suppliers must not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it will be 15 years of age.
- Employees under 18 years of age are required to adhere strictly to legal standards concerning working hours, wages, and conditions, as well as any educational or training mandates.
- Suppliers are prohibited from employing forced, bonded, or involuntary labour; all work must be willingly undertaken. Workers must retain control over their identification documents, such as passports and work permits.

- Suppliers must guarantee that workers do not incur any costs or fees related to securing employment during both the hiring process and their period of employment. It is the supplier's duty to cover all legally mandated fees and expenses associated with workers, including licenses and levies.
- The implementation of punishment, along with any mental or physical coercion, is strictly prohibited. It is essential for disciplinary policies and procedures to be clearly defined and communicated to all employees. Suppliers are obligated to comply with all pertinent national laws and compulsory industry standards related to working hours, overtime, wages, and benefits.
- Workers must be paid promptly, with transparent explanations of how their compensation is determined. Deductions from wages as a form of discipline are not permitted unless legally justified; even then, such deductions should be kept to a minimum.
- Employees of suppliers have the right to decide freely whether to join a union or any type of employee representation without facing threats or intimidation. Suppliers must recognize and respect the right to collective bargaining in accordance with applicable laws.
- Creating a work environment that embraces diversity and inclusion is crucial. Suppliers are required to ensure there is no discrimination based on attributes such as gender, race, religion, age, disability, sexual orientation, national origin, or any other characteristic protected by law.
- We expect our suppliers to uphold high standards of occupational health and safety by adopting a health and safety management system that fits their specific business requirements.
- Adherence to applicable health and safety regulations is compulsory. Suppliers must offer a safe working environment that fosters good health to protect employees' well-being, safeguard third parties, and prevent accidents and occupational illnesses. This involves regularly assessing workplace risks and implementing effective hazard control measures. Employees should be provided with sufficient education and training on health and safety topics.

9.2 Breaches of this Policy and Remediation

Should VooDu Marketing become aware that any supplier does not meet the Modern Slavery Supplier Code of Conduct, we will engage directly with the supplier and develop an action plan to eradicate the practice in a transparent, timely and efficient manner.

Immediate Response

- Stop Harmful Practices: Take urgent action to halt modern slavery.
- Support Victims: Provide safety, medical care, and legal aid.
- Notify Authorities: Report incidents to law enforcement and regulators.
- Review Supplier Relations: Suspend non-compliant suppliers temporarily.

Investigation

- Assess the Situation: Conduct an independent investigation.
- Identify Causes: Determine responsibility and systemic risks.

Corrective Actions

- Supplier Improvements: Require better policies and working conditions.
- Training: Educate suppliers and staff on ethical standards.
- Monitor Progress: Conduct follow-up audits and evaluations.

Policy & Process Updates

- Enhance Due Diligence: Strengthen supplier vetting and risk assessments.
- Improve Reporting: Establish anonymous whistleblower channels.
- Update Contracts: Enforce compliance with labour laws.

Transparency & Reporting

- Disclose Actions: Report cases and remediation efforts.
- Engage Stakeholders: Communicate efforts to investors and customers.
- Continuous Review: Regularly update policies and strategies.

Further to above VooDu Marketing will:

- Review the details of the allegation and the associated evidence.
- We will check the register to confirm that all relevant supply chain personnel have signed off on all Policy and code of conduct documentation.
- We will check the register to confirm that all relevant supply chain personnel have participated in Modern Slavery policy training.
- We will re-evaluate modern slavery risks through the completion of a "follow up modern slavery supplier questionnaire."
- We will create a timely action plan to irradicate any breach and get mutual agreement from the offending party on the plan's execution
- take the action to terminate the relationship with suppliers who refuse to address their modern slavery risks or fail to improve their performance in line with an agreed action plan.
- NOT knowingly use or contribute to modern slavery practices in any form.
- Actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chains.
- Acknowledge that any form of exploitative treatment, punishment, abuse of labour rights and coercive control of workers in our operations or supply chain is unacceptable
- Acknowledge that ethical business processes are an essential part of value for money and 'fit for purpose' considerations
- Work with our clients and customers to ensure the final purchasing decisions are not based on price alone

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Approved by: VooDu Marketing Pty Ltd

This policy reflects our unwavering commitment to eliminating modern slavery and will be reviewed annually to ensure ongoing effectiveness and compliance with legal and ethical standards.