Modern Slavery Policy

Astar Rigging Constructions Pty Ltd

Effective: 1 August 2026

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Purpose

Astar Rigging Constructions Pty Ltd (Astar) is committed to conducting business ethically, responsibly and in a manner that respects human rights.

The purpose of this Policy is to:

- Prevent, identify and address modern slavery risks within Astar's operations and supply chains;
- Promote awareness of modern slavery and human rights risks among employees, contractors and suppliers;
- Establish clear responsibilities for managing modern slavery risks; and
- Demonstrate Astar's commitment to respecting internationally recognised human rights and complying with applicable modern slavery legislation.

Scope

This Policy applies to all persons engaged by or acting on behalf of Astar, including:

- Managing Directors
- Employees
- Labour hire personnel
- Contractors and subcontractors
- Consultants
- Suppliers
- Other business partners

Our Commitment to Human Rights

Astar is committed to respecting and supporting internationally recognised human rights in all aspects of our business.

We have zero tolerance for:

- Modern slavery;
- Human trafficking;
- Forced labour;
- Debt bondage;
- Child exploitation;
- Forced marriage;
- Servitude; and
- Any other form of exploitation that deprives individuals of their freedom, dignity or fundamental human rights.

Our approach is informed by:

- The United Nations Guiding Principles on Business and Human Rights (UNGPs);
- The Universal Declaration of Human Rights
- The International Labour Organisation (ILO) Fundamental Conventions;
- The Australian Modern Slavery Act 2018 (Cth); and
- Applicable workplace and human rights legislation.

We are committed to identifying, preventing, mitigating and addressing modern slavery risks within our operations, labour supply arrangements and supply chains.

What is Modern Slavery?

Modern slavery refers to serious exploitation where a person is deprived of their freedom for another person's commercial benefit.

Modern slavery can take many forms, including:

- Slavery and Human Trafficking – Owning, controlling, transporting or trading persons for exploitation
- Forced Labour – Work or services performed under threat, coercion or intimidation.
- Debt Bondage – A person working to repay a debt where the debt is unfair, unlimited or cannot realistically be repaired.
- Forced Marriage – Marriage entered into without free and full consent.
- Deceptive Recruiting – Recruiting workers through misleading or deceptive practices regarding wages, conditions or freedom of movement.
- Child Labour – the exploitation of children through work that is harmful, unsafe or interferes with their education or development.

Modern slavery does not include poor employment practices alone, however unlawful treatment of workers may indicate a heightened risk of modern slavery.

Indicators of Modern Slavery

Indicators that may suggest a risk of modern slavery include circumstances where a person:

- Does not possess their own passport, identification or travel documents;
- Appears controlled, intimidated or coached by another person;
- Is unable to speak freely about their employment conditions;
- Has restricted communication with family or friends;
- Is living in overcrowded or unsuitable accommodation;
- Has little or no control over their wages or finances;

- Is transported to and from work by others in unusual circumstances;
- Appears fearful, withdrawn or anxious; or
- Is working excessive hours under unreasonable conditions.

The presence of one indicator does not necessarily mean modern slavery is occurring, but concerns should always be raised and investigated.

Accountability and Responsibilities

Preventing modern slavery is a shared responsibility across Astar.

Managing Directors are responsible for:

- Approving this Policy;
- Providing oversight of Astar's modern slavery framework;
- Reviewing significant modern slavery risks and incidents;
- Monitoring the effectiveness of modern slavery controls;
- Implementing this Policy throughout the organisation;
- Ensuring adequate resources are available to manage modern slavery risks;
- Promoting a culture of ethical business conduct and respect for human rights; and
- Supporting a continuous improvement in modern slavery risk management.

The Administration & Compliance department are responsible for:

- Maintaining and reviewing this Policy;
- Coordinating modern slavery awareness training;
- Supporting supplier due diligence activities;
- Monitoring implementation of modern slavery controls;
- Maintaining relevant records;
- Lead by example;
- Promote awareness of modern slavery risks;
- Support risk assessments and investigations where required; and
- Escalate concerns promptly to the Managing Directors.

Employees and Contractors must:

- Comply with this Policy;
- Remain alert to potential indicators of modern slavery;
- Participate in relevant training;
- Report concerns promptly; and
- Support investigations as required.

Supplier and Business Partners Expectations

Astar expects suppliers, subcontractors, labour providers and business partners to upload human rights and operate in a manner consistent with this Policy.

Suppliers are expected to:

- Comply with applicable labour and employment laws;
- Take reasonable steps to identify and address modern slavery risks within their operations and supply chains;
- Cooperate with reasonable requests for information regarding labour practices and modern slavery management; and
- Notify Astar of any actual or suspected modern slavery concerns relating to products or services supplied to Astar.

Where appropriate, Astar may undertake supplier due diligence activities, including:

- Risk assessments;
- Supplier questionnaires or declarations;
- Contractual modern slavery requirements;
- Supplier reviews; and
- Ongoing monitoring of identified risks.

Where significant concerns are identified, Astar may require corrective actions, suspend procurement activities or terminate business relationships.

Reporting Concerns

Anyone who reasonably suspects modern slavery practices may be occurring within Astar's operations or supply chains must report their concerns immediately.

Concerns should be reported to a Managing Director:

Andrew Jamison	andy@astarrigging.com	0437 538 702
James Powis	jim@astarrigging.com	0457 868 596

Reports will be treated seriously and investigated appropriately. If there is an immediate threat to a person's safety, emergency services should be contacted without delay.

Training and Awareness

Astar is committed to ensuring employees understand:

- What modern slavery is;
- How modern slavery risks may arise;
- Indicators of modern slavery;
- Their responsibilities under this Policy; and
- How to report concerns.

Modern slavery awareness forms part of employee onboarding and may be reinforced through refresher training and company communications.

Related Policies and Documents

This Policy should be ready in conjunction with:

- Astar Employee Handbook
- Astar Health and Safety Management System
- Astar Employment Agreement

The principles contained within this Policy are incorporated into Astar's recruitment, onboarding, procurement and supplier management processes.

Monitoring and Continuous Improvement

Astar recognises that modern slavery risks can evolve over time.

We are committed to continually improving our approach by:

- Reviewing modern slavery risks periodically;
- Assessing the effectiveness of controls;
- Monitoring changes within our operations and supply chains;
- Responding to emerging risks; and
- Strengthening due diligence and awareness activities where appropriate.

Policy Review

This Policy will be reviewed at least every two years, or sooner where legislative, operational or organisational changes occur.

Policy Approval

This Modern Slavery Policy has been approved by the Managing Directors of Astar Rigging Constructions Pty Ltd. The Managing Directors are committed to ensuring the effective implementation of this Policy across all operations and supply chain activities.

Document Information	
Policy Owner	Administration & Compliance
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Endorsed By	Managing Directors
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