OLEOLOGY PTY LTD

Human Rights & Modern Slavery Policy

Document No.	P208
Revision	Rev 0
Issue Date	26 May 2026
Prepared By	QA/QC Coordinator
Reviewed By	HR Team
Approved By	Director
Next Review Date	May 2027

1. Purpose

This policy establishes OLEOLOGY Pty Ltd's commitment to respecting and upholding fundamental human rights across all business operations, supply chains, and commercial relationships. It further sets out the company's obligations and approach to identifying, preventing, and remediating modern slavery risks in accordance with the Modern Slavery Act 2018 (Cth).

2. Scope

This policy applies to:

- All OLEOLOGY Pty Ltd employees, directors, and officers
- Contractors, labour hire personnel, and subcontractors engaged by OLEOLOGY
- Suppliers, vendors, and third-party service providers within OLEOLOGY's supply chain
- All operations conducted from OLEOLOGY's Perth, Western Australia facility and any project sites

3. Legislative & Regulatory Framework

This policy is informed by and shall be read in conjunction with:

- Modern Slavery Act 2018 (Cth)
- Work Health and Safety Act 2020 (WA)
- Fair Work Act 2009 (Cth)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)

- ILO Core Labour Standards
- ISO 9001:2015 — Clause 7.1.2 (People) and Clause 8.4 (Control of External Providers)
- ISO 45001:2018 — Worker participation and wellbeing requirements
- OLEOLOGY Integrated Management System (IMS) documentation suite

4. Policy Commitments

4.1 Human Rights

OLEOLOGY Pty Ltd is committed to:

- Treating all people with dignity, fairness, and respect
- Providing a workplace free from discrimination, harassment, intimidation, and abuse
- Ensuring workers are employed under lawful, transparent, and fair terms and conditions
- Paying all employees at or above applicable minimum wage and award entitlements under the Fair Work Act 2009 (Cth)
- Respecting workers' rights to freedom of association and collective bargaining
- Prohibiting child labour in all forms across our operations and supply chain
- Prohibiting forced, bonded, or compulsory labour in any form
- Ensuring all workers are free to terminate their employment without penalty or restriction

4.2 Modern Slavery

OLEOLOGY Pty Ltd recognises that modern slavery encompasses forced labour, debt bondage, human trafficking, slavery, servitude, and deceptive recruitment. The company commits to:

- Taking reasonable steps to identify modern slavery risks within its operations and supply chains
- Not engaging, directly or indirectly, in any form of modern slavery practice
- Conducting due diligence on suppliers and contractors operating in higher-risk categories or geographies
- Incorporating modern slavery risk considerations into supplier pre-qualification and procurement processes
- Cooperating with clients, regulators, and law enforcement where modern slavery risks are identified

5. Supply Chain Due Diligence

OLEOLOGY Pty Ltd's procurement and supply chain processes shall include:

Process	Description
Supplier Pre-Qualification	All new suppliers and subcontractors must complete an OLEOLOGY Supplier Pre-Qualification Questionnaire, which includes modern slavery and ethical sourcing declarations.
Risk-Based Assessment	Higher-risk supply categories (e.g. labour-intensive services, international material sourcing) shall be subject to enhanced due diligence.

Contractual Requirements	OLEOLOGY's standard commercial contracts shall include a clause requiring suppliers to comply with applicable modern slavery legislation and to flow down equivalent obligations to their own subcontractors.
Ongoing Monitoring	Supplier performance reviews shall include assessment of compliance with this policy.

6. Reporting & Grievance Mechanisms

All employees, contractors, and supply chain partners are encouraged to report:

- Suspected or actual modern slavery practices
- Violations of this policy or related human rights concerns
- Retaliatory conduct directed at any person who has raised a concern in good faith

Reports may be made to the following contacts:

Contact	Role
Sanjiv Indran	HR Manager
Michelle McDonough	Finance & Administration
Paul Callaghan	Managing Director

Reports will be treated with confidentiality to the extent practicable. OLEOLOGY Pty Ltd prohibits retaliation against any person who reports a concern in good faith.

7. Training & Awareness

OLEOLOGY Pty Ltd will ensure that:

- All employees receive awareness training on human rights and modern slavery risks relevant to their role at induction and periodically thereafter
- Personnel with procurement, supplier management, or HR responsibilities receive targeted training on modern slavery due diligence
- Training records are maintained in the OLEOLOGY IMS training register

8. Modern Slavery Reporting Obligations

Where OLEOLOGY Pty Ltd meets or is anticipated to meet the revenue threshold under the Modern Slavery Act 2018 (Cth), a Modern Slavery Statement will be prepared annually and submitted to the Australian Border Force (ABF) Modern Slavery Register. The statement will address the six mandatory criteria as prescribed under the Act.

Note: OLEOLOGY Pty Ltd currently monitors its annual revenue threshold and will activate formal reporting obligations as applicable.

9. Roles & Responsibilities

Role	Responsibility
Managing Director	Policy ownership, approval, and executive accountability
Operations Manager	Operational implementation and supplier oversight
Finance & Administration	Procurement due diligence support and record-keeping
QA/QC Coordinator	IMS integration, audit support, and document control
All Employees	Compliance with this policy and reporting of concerns

10. Non-Compliance

Violations of this policy — whether by employees, contractors, or supply chain partners — will be investigated and may result in:

- Disciplinary action up to and including termination of employment
- Termination of supplier or contractor agreements
- Referral to relevant regulatory authorities

11. Policy Review

This policy shall be reviewed annually, or earlier in response to:

- Changes in applicable legislation or regulation
- Significant changes to OLEOLOGY's supply chain or operations
- Audit findings or identified incidents relevant to human rights or modern slavery

12. Document Control

Rev	Date	Description	Prepared	Reviewed	Approved
0	26 May 2026	Initial Issue	QA/QC	HR Manager	Director

OLEOLOGY Pty Ltd —
This policy forms part of the OLEOLOGY Integrated Management System (IMS)