



amaysim Group Human Rights Policy

amaysim Australia Limited (the **Company**)

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1 amaysim commitment to human rights

The Company conducts business in a way that respects the human rights of all people, including our employees, the communities in which we operate, and those working within our supply chain.

The Company's commitment to human rights and its reputation as an ethical business organisation is important to its ongoing success. The Company expects staff and business partners including suppliers to be familiar with, and have a personal commitment to, meeting the high standards with which we choose to operate. Acting ethically and responsibly goes well beyond mere compliance with legal obligations and involves acting with honesty, integrity at all times.

This Human Rights Policy ("**Policy**") provides more detail on our approach and procedures. It is supported by the human rights commitments in our Code of Conduct, Diversity Policy, Whistleblower Policy and Supplier Code of Conduct.

This Policy aligns with the *United Nation's (UN) Guiding Principles on Business and Human Rights* and we incorporate the *Ten Principles of the UN Global Compact* into our policies and procedures and demonstrate our commitment to these principles by:

- (a) maintaining ethical standards in the conduct of business activities as detailed in our Code of Conduct;
- (b) promoting and supporting a culture of transparency, integrity, corporate compliance, action and accountability with stakeholders. Our Whistleblower Policy supports and encourages employees and other stakeholders to report corrupt, unethical or illegal conduct that conflicts with our Code of Conduct;
- (c) complying with applicable legal and regulatory requirements in the countries in which we operate that protect human rights;
- (d) considering the risk of negative impacts on human rights through our activities and third-party relationships and where applicable, taking suitable action to eliminate such impacts. We expect each of our suppliers to uphold to our Supplier Code of Conduct;
- (e) promoting diversity through our Diversity Policy which is committed to embracing diversity and providing our employees with a non-discriminatory environment that does not tolerate harassment, vilification and victimisation;
- (f) not supporting or tolerating any form of forced, compulsory or child labour in our operations or supply chain; and
- (g) annual reporting under the *Modern Slavery Act 2018* continues to ensure that we work to identify and mitigate the risk of modern slavery in day-to-day operations and extended supply chains.

2 Human rights in the workplace

The Company respects the rights of our workers, appreciating that the way we treat our employees reflects on our core values. We are committed to compliance with applicable international and national laws and standards and uphold the human rights of workers. All workers including temporary, migrant, student contract, direct (or any other type of worker) shall be treated with respect and dignity as understood by the international community.

2.1 Child labour

The Company will not engage in the employment of any persons under the age of 15, or under the age for applicable compulsory education, or under the minimum age for employment in the applicable country (whichever is greatest).

2.2 Young workers

People under the age of 18 are not permitted to be employed in roles that jeopardise their health and safety, nor should work requirements interfere with education or be harmful to mental, social or moral development.

2.3 Forced labour

The Company does not engage in the practice of forced or involuntary labour in any form.

2.4 Compensation, wages and benefits

Laws applicable to minimum wage, overtime hours and other legally mandated benefits will be observed at all times. The Company does not deduct from wages as a disciplinary measure.

2.5 Freedom of association and collective bargaining

Workers may associate freely, bargain collectively and seek representation in accordance with local laws. Workers may communicate openly and share grievances with management about working conditions without fear of reprisal or harassment.

2.6 Workplace policies

The Company maintains written workplace management policies and standards that promote equal opportunity, anti-discrimination and anti-harassment. These policies and standards also address bullying principles and employee grievance resolution.

2.7 Diversity

The Company values and is proud of its strong and diverse workforce and is committed to supporting and further developing this diversity through attracting, recruiting, engaging and retaining diverse talent and aligning the Company's culture and management systems with this commitment. This is further detailed in our [Diversity Policy](#).

3 Supply chain & ethical purchasing

The Company and its subsidiaries promote business activities being conducted in a safe, equitable and responsible manner. We recognise that the nature of our supply chain is far reaching and that our responsibilities in supply chain management extend beyond our own direct operations. We view our suppliers as key partners and expect our suppliers to uphold this Supplier Code of Conduct in the dealings with the Company, and in their own supply chains.

4 Environment

The Company seeks to contribute to the protection of the environment to promote a healthy and prosperous society for the communities we interact with including our customers, those of our business partners and those in our supply chains. The Company also recognises that developing nations and vulnerable populations are at significant risk from the effects of climate change.

The amaysim Group is a technology-led business that is not involved in the manufacture or distribution of goods, extraction of resources, or generation of electricity or gas.

The Company is committed to minimising its environmental footprint and continually improving its sustainability practices and we seek to do this, where practical, by:

- partnering with suppliers that have high quality sustainability practices; and
- minimising waste and the consumption of materials, energy and water.

The Company is also a party to various energy efficiency schemes in New South Wales, Victoria and South Australia. Under these schemes, the Company undertakes set activities which result in a reduction in overall energy use and greenhouse gas emissions.

5 Privacy

The Company takes the protection of privacy seriously, understanding that the security of customer information is core to the way we operate the business.

Our Privacy Policy sets out how we collect, use and disclose personal information. Importantly, we take numerous steps to protect personal information from misuse, interference and loss, and unauthorised access, modification or disclosure. We strive to make our customers aware of what data we hold about them on request and provide advice on what sorts of information we must hold by law.

We assist state and federal government agencies by providing them, with access to personal information where permitted by law, and may seek to prevent access to data where appropriate and objectionable.

6 Anti-corruption

The Company remains committed to honesty, openness and integrity in all aspects of its operations including those of its supplier and commercial partners. amaysim is committed to promoting and supporting a culture of corporate compliance and ethical behaviour.

We recognise the value of keeping the laws and standards that apply to us in our work and encourage everyone to report misconduct. We will not tolerate corrupt, illegal or other undesirable conduct nor condone victimisation of anyone who intends to disclose or has disclosed misconduct.

7 Indigenous peoples

The Company is committed to respecting the rights of indigenous peoples, including land rights, in our operations, in line with the *United Nations Declaration on the Rights of Indigenous Peoples*.

8 Grievance mechanisms

The Company takes the concerns of staff, shareholders, customers and other key stakeholders very seriously and has a number of mechanisms in place to address and remedy them. We document these mechanisms in our Whistleblower Policy, in our Supplier Code of Conduct and in our complaints handling policies.

The Company is committed to addressing human rights grievances and providing appropriate avenues for affected individuals or communities to come forward. The Company encourages feedback and reporting on violations of our policies via the appropriate policy contact and via our ethical resourcing contact: ethical.resourcing@amaysim.com.au

The Company has a policy of taking reasonable steps to support and protect anyone who:

- intends to or actually makes a disclosure;
- is mentioned in the disclosure;
- acts as a witness; and/or
- otherwise assists with the investigation and resolution of the disclosure.

9 Due diligence

The Company seeks to align its approach to due diligence with the *United Nation's (UN) Guiding Principles on Business and Human Rights*. We seek to manage human rights risks in connection with our products and service through our Code of Conduct, and Supplier Code of Conduct and our Privacy Policy. We apply these policies both locally in Australia, and in our international business operations.

We seek to assess our human rights impacts, both actual and potential when:

- developing new products and services;
- entering new markets;
- implementing new partnerships or acquisitions; and
- working with our suppliers and existing business partners.

10 Governance

This policy has been approved by the Company's Board, while our Chief People and Culture Officer is responsible for oversight of this policy.

Questions or concerns about this policy including employee concerns can be raised via email to: ethical.resourcing@amaysim.com.au