



# Modern Slavery Policy



**SPIRIT of  
TASMANIA**

## DOCUMENT CONTROL

<b>Policy</b>	Modern Slavery Policy		
<b>Policy Number</b>	TTL-POL-643		
<b>Date of First Issue</b>	April 2020		
<b>Last Reviewed</b>	March 2023		
<b>Approved By</b>	Board	<b>Date</b>	April 2020
<b>Next Review Date</b>	March 2026		
<b>Version</b>	2		
<b>Policy Owner</b>	Company Secretary		

## CHANGE REGISTER

<b>Date</b>	<b>Version</b>	<b>Description of Amendments</b>	<b>Prepared by</b>	<b>Approved by</b>
03/23	2	<ul style="list-style-type: none"> <li>Updated position titles</li> <li>Update format and Company references</li> <li>Insertion of interpretation and access paragraphs</li> <li>Insertion of a paragraph outlining the process for drafting and approval by the Board of the Company's annual Modern Slavery Statement</li> </ul>	GS/CS	CEO

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# MODERN SLAVERY POLICY

## 1 Objective

The term “modern slavery” is broad and includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting of labour or services, and the worst forms of child labour.

The *Modern Slavery Act 2018 (Cth)* (**Modern Slavery Act**) commenced on 1 January 2019 and requires a reporting entity (being an entity based in or operating in Australia with an annual consolidated revenue of \$100 million or more) to:

- (a) ensure their business is free from modern slavery, including their supply chains; and
- (b) document the steps taken to assess and address risks of modern slavery in an annual modern slavery statement that will be published on the Modern Slavery Statements Register maintained by the Department of Home Affairs.

The objectives of this policy is to ensure the Company recognises and meets its compliance obligations under the Modern Slavery Act.

## 2 The Company’s Structure, Operations and Supply Chains

### 2.1 Structure

The Company is a reporting entity under the Modern Slavery Act and its first Modern Slavery Statement was submitted by 31 December 2020. This is on the basis that the Company is a financial year reporting entity in accordance with the *Income Tax Assessment Act 1997 (Cth)*. As required by the Modern Slavery Act, the Company updates its Modern Slavery Statement annually.

The Company is a state-owned company and owns several business names including Spirit of Tasmania, Edgewater Hotel and Edgewater Motor Inn.

### 2.2 Operations and Supply Chains

The Company operates its business in Tasmania and Victoria and has approximately 500 employees.

The Company procures and outsources:

- (a) goods (including, but not limited to, fuel, food and beverages, plant and equipment, lifesaving equipment, accommodation supplies, office supplies, uniforms, tourism souvenirs); and
- (b) services (including, but not limited to, services in relation to security, stevedoring, freight, media, marketing, tourism, sponsorship, IT, maintenance, cleaning, hospitality),

from within and outside Australia.

The Company enters into agreements and contracts (both short and long term) with suppliers and contractors across a variety of sectors (including, accommodation, retail and hospitality, travel, transport, marketing, media, and infrastructure and maintenance).

The Company’s suppliers and contractors in turn engage third party suppliers and subcontractors to assist in providing goods and services to the Company.

The Company is committed to preventing modern slavery in its business and supply chains.

This policy applies to all persons working on behalf of the Company including employees, directors, officers, contractors, suppliers, consultants and any other third-party representative (**Persons**).

### 3 Management of Modern Slavery

To ensure the Company is aware of and manages modern slavery risks, the Company (amongst other things) incorporates and applies a range of measures into its everyday procurement and contract management practices taking a risk-based approach, including:

- (a) undertaking risk assessments of its business and supply chains to determine “at risk” areas that may cause, contribute or are directly linked to modern slavery practices so it can monitor and manage them;
- (b) where the Company determines appropriate with reference to its risk assessments:
  - (i) using reasonable endeavours to make all Persons aware of this policy and the requirement to comply with its terms;
  - (ii) bringing a Person's obligations under the Modern Slavery Act to its attention by including in agreements and contracts for the supply of goods and services to the Company, or agreements involving a supply chain relationship, contractual obligations for such Persons to:
    - (A) comply with this policy and the Modern Slavery Act;
    - (B) warrant that their supply chain complies with this policy and the Modern Slavery Act;
    - (C) maintain records so that their supply chains can be traced;
    - (D) report breaches of the Modern Slavery Act; and
    - (E) restrict subcontracting arrangements;
  - (iii) including a provision in such agreements and contracts that non-compliance with this policy is a basis for termination of the agreement or contract;
  - (iv) obtaining information from Persons as appropriate regarding their structure, place of business, supplier relationships, source of goods and services, and training and issue a due diligence questionnaire to be completed accurately by those Persons to determine the source of products and materials and their business practices.

## 4 Roles & Responsibilities

### 4.1 Responsibility

Within the Company, the Company Secretary is responsible for the management of this policy. The Company Secretary will monitor the Company's modern slavery policy and audit procedures and their effectiveness on modern slavery prevention on an annual basis.

This policy will be updated from time to time. The most recent policy is available on the Company's website. The Company expects all Persons to familiarise themselves with its terms.

### 4.2 Reporting Modern Slavery

If you suspect modern slavery at the Company or within its supply chain, you are encouraged to notify the Company Secretary in the first instance by: phone on 03 64199073 or email [smaycock@spiritoftasmania.com.au](mailto:smaycock@spiritoftasmania.com.au). However if risk of harm is immediate, call 000.

If the requirements of the Company's Grievance Policy, Whistleblowing Policy and/or Public Interest Disclosure Policy (which are available on the Company's website) are met, you can make a disclosure

about suspected modern slavery practices via the channels identified in those policies.

The Company will take steps to prevent further harm for a victim or victims. The privacy of the discloser and suspected victim will be respected.

### 4.3 Handling a Report

The Company will assess and investigate any disclosure made with respect to modern slavery as it deems appropriate:

- (a) in accordance with its current policies;
- (b) by seeking third party support; and
- (c) by reporting any suspected situations of modern slavery to the Australian Federal Police.

### 4.4 Remediation

If a breach of this policy is identified, the Company may take other action as appropriate for the breach such as:

- (a) assisting with remediation where harm or non-compliance is identified;
- (b) issuing formal apologies;
- (c) stopping certain activities or terminating a contract or agreement; or
- (d) taking disciplinary action in accordance with its disciplinary procedures.

### 4.5 Modern Slavery Statement

The Company will prepare a Modern Slavery Statement (the **Statement**) annually pursuant to the Modern Slavery Act to report on its reasonable endeavours to meet its continuous improvement obligations to understand, identify and address the risk of modern slavery in its operations and supply chains.

The Statement will be prepared in consultation with the TT-Line Leadership Team and will be approved by the Board of Directors of the Company and signed by the Chairman and CEO. The Statement will be submitted to the Australian Border Force for registration and publication on the on-line register.

## 5 Related Company Documents

Other policies to refer to in addition to this policy include the:

- (a) Grievance Policy,
- (b) Whistleblowing Policy;
- (c) Public Interest Disclosure Policy;
- (d) Code of Conduct and Ethics Policy;
- (e) Appropriate Workplace Behaviour Policy;
- (f) Privacy Policy; and the
- (g) Procurement Policy.

## 6 Interpretation of Policy

Questions relating to the interpretation or enforcement of this policy should be directed to an Employee's Manager or to the General Counsel/Company Secretary.

## **7 Ensuring the policy is easily accessible**

This policy is easy to access and is available on the Company's website at:  
<https://www.spiritoftasmania.com.au/> .

The Company will also make the policy available:

- (a) in hard copy at the Company's offices at Esplanade, East Devonport in Tasmania and Corio Quay, Port of Geelong in Victoria; and
- (b) on the Company's intranet.

The Company will ensure that relevant staff receive a briefing on this policy. The Company will review this policy from time to time. The Company encourage you to check the Company's website regularly as any updated policy will be available on the Company's website.

## APPENDIX A – GENERAL COMPANY TERMS AND DEFINITIONS

**Applicable Laws** means

- a) Acts, Ordinances, regulations, by-laws, orders, awards, Codes of Practice and proclamations of the jurisdiction where work or a particular part of the work is being carried out;
- b) certificates, licences, consents, permits, approvals and requirements of organisations having jurisdiction in connection with the carrying out of work, or
- c) fees and charges payable in connection with the foregoing.

**ATO** means the Australian Taxation Office.

**Authorised Company Guest(s)** means a person(s) who has or have been engaged by the Company for the provision of goods or services to the Company and of whom are travelling in connection with the provision of that good or service to the Company; or any other person so designated by the Chief Executive Officer.

**Board** means the current Board of Directors elected or appointed to govern the affairs of the Company, the members of which may change from time to time.

**Business Purpose** Travel means travel that is required in connection with the Company Representative's employment with the Company and has been authorised as such by their Manager or Executive Manager for an employment related activity.

**Communications Device** means any device owned and/or otherwise supplied by the Company and may include but is not limited to telephones (both landline and mobile devices), computers, radios, copiers, facsimiles, and their respective hardware, software and applications including but not limited to email, internet services and social media, including systems and mechanisms.

**Contractor** means a contractor or subcontractor or an employee of a contractor or subcontractor who carries out work in a contracted capacity for the Company.

**Commonwealth record** has the same meaning as in the Archives Act 1983.

**Company** means TT-Line Company Pty Ltd.

**Company Property** means any real or tangible property (e.g. vessels, cash, motor vehicles, computers, desks, chairs, mobile phones and stationery) or any intangible property (e.g. intellectual property and goodwill) owned by the Company.

**Company Representatives** means an Employee, Worker or Officer of the Company.

**Confidential Information** means any information, with the exception of information in the public domain other than as a result of a breach by the Company Representatives: disclosed, or communicated to the Company Representatives by, or on behalf of, the Company (a) that is or are marked or designated as 'Confidential', (b) would at law be considered secret or 'confidential' information of the Company, (c) that the Company Representatives might reasonably expect the Company to regard as confidential, (d) which comes into the Company Representative's possession, or is learnt, accessed or generated by the Company Representative, in the course of the Company Representative's employment, whether or not the information was originally supplied by the Company and relates to Company dealings, customer lists, financial position and arrangements, funding, transaction, general affairs, contracts entered into, program planning and consultant's advice, promotional information, planning information, equipment and techniques used or any of the above matters for the Company's business. Without limiting the generality of the above, Confidential Information may be in relation to internal Company management, include the structure of the





Company, information about Company Representatives, policies, marketing programs, strategies, plans, investments, aspects of its future operations or marketing programs.

**Conflict of Interest** means an actual, potential or perceived conflict between work duties and private interests of a Company Representative, in which the Company Representative has private-capacity interests which could improperly influence the performance of their duties and responsibilities.

**Employee** has the same meaning as 'Worker' (refer to definition of Worker).

**FOC** means Free of Charge.

**Leadership Team** means the Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, General Manager – Freight Sales and Port Operations; General Manager – Human Resources, General Manager – Marine Operations, General Manager – Retail & Hospitality, General Manager – Marketing, General Manager Passenger Sales and the General Counsel /Company Secretary.

**Manager** means an Employee, who is appointed to a position that directs controls and/or has line management responsibility for other Employees.

**Officer** has the same meaning as the term 'Officer' as per section 4 of the *Work Health & Safety Act 2012* (Tasmania).

**Others at the Workplace** means any person who is not a Company Representative at the Workplace.

**Personal Information** means information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

**Persons** means all persons working on behalf of the Company including employees, directors, officers, contractors, suppliers, consultants and any other third-party representative

**Policy(ies)** means any document that is approved by the Company and includes any ancillary documents to that Policy(ies) including procedures and rules.

**Sensitive Information** means personal information or an opinion relating to personal information about individuals':

- a) Racial or ethnic origin;
- b) Political opinions;
- c) Membership of a political association;
- d) Religious beliefs or affiliations;
- e) Philosophical beliefs;
- f) Membership of a professional or trade association;
- g) Membership of a trade union;
- h) Sexual preferences or practices;
- i) Criminal record; or
- j) Health information about an individual.

**Social Media** means social network websites, personal websites and other applications where users build online profiles and share content (including video and photographs) with other profiles to which they choose to be linked and blogs that host and distribute user-created or user-uploaded multimedia content.

**Special Employee** has the same meaning as the term 'Special Employee' as per section 49 of the Gaming Control act 1993 (Tasmania). This means a natural person who (a) is employed or working, whether for remuneration or reward or not, for the Company in an approved venue and who carries out prescribed



duties, or (b) is employed by or working for the Company and who carries out prescribed duties, or (c) is employed or working, whether or not for remuneration or reward, for the Company and who carries out prescribed duties.

**Standard Passenger Vehicle** means a domestically registered motor vehicle that is either a wagon or sedan and is not more than 6 meters in length and is not more than 4 meters in height.

**Worker** has the same meaning as the term 'Worker' as per Section 7 of the *Work Health & Safety Act 2012* (Tasmania). This means a person who carries out work in any capacity for the Company, including work as:

- a) an Employee;
- b) a contractor or subcontractor;
- c) an employee of a contractor or subcontractor;
- d) an employee of a labour hire company who has been assigned to work in the person's business or undertaking;
- e) an outworker;
- f) an apprentice or trainee;
- g) a student gaining work experience;
- h) a volunteer; or
- i) a person of a prescribed class.

**Workplace** has the same meaning as the term 'Workplace' as per section 8 of the *Work Health & Safety Act 2012* (Tas). This means a Workplace is a place where work is carried out for the Company and includes any place where a Worker goes, or is likely to be, while at work. A place includes:

- a) a vehicle, vessel, aircraft or other mobile structure, and
- b) any waters and any installation on land, or
- c) floating on any waters.