

Modern Slavery Policy

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MODERN SLAVERY POLICY

1. What is Modern Slavery

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) (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.

2. TT-Line structure, operations and supply chains

2.1 Structure:

TT-Line Company Pty. Ltd. (TT-Line) is a reporting entity under the Act and its first modern slavery statement is due by 31 December 2020. This is on the basis that TT-Line is a financial year reporting entity in accordance with the Income Tax Assessment Act 1997 (Cth).

TT-Line 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

TT-Line operates its business in Tasmania and Victoria and has approximately 500 employees. TT-Line 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.

TT-Line 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).

TT-Line’s suppliers and contractors in turn engage third party suppliers and subcontractors to assist in providing goods and services to TT-Line.

TT-Line is committed to preventing modern slavery in its business and supply chains.

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

3. Management of modern slavery

To ensure TT-Line is aware of and manages modern slavery risks, TT-Line will (amongst other things):

- (a) undertake 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 TT-Line determines appropriate with reference to its risk assessments:
 - (i) use its best endeavours to make all Persons aware of this policy and the requirement to comply with its terms;
 - (ii) bring a Person’s obligations under the Act to its attention by including in agreements and contracts for the supply of goods and services to TT-Line, or agreements involving a supply chain relationship, contractual obligations for such Persons to:
 - (A) comply with this policy and the Act;
 - (B) warrant that their supply chain complies with this policy and the Act;
 - (C) maintain records so that their supply chains can be traced;
 - (D) report breaches of the Act; and
 - (E) restrict subcontracting arrangements;
 - (iii) include a provision in such agreements and contracts that non-compliance with this policy is a basis for termination;
 - (iv) obtain 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. Responsibility, reporting and remediation

4.1 Responsibility

Within TT-Line, Company Secretary is responsible for the management of this policy. The Company Secretary will monitor TT-Line’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 TT-Line’s website. TT-Line expects all Persons to familiarise themselves with its terms.

4.2 Reporting modern slavery

If you suspect modern slavery at TT-Line or within its supply chain, you are encouraged to notify the Company Secretary in the first instance by: phone on 03 64199073 or email kfm@spiritoftasmania.com.au

However If risk of harm is immediate call 000.

If the requirements of TT-Line’s Grievance Policy, Whistleblowing Policy and/or Public Interest Disclosure Policy (which are available on TT-Line’s website) are met, you can make a disclosure about suspected modern slavery practices via the channels identified in those policies.

TT-Line 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

TT-Line 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, TT-Line may take other action as appropriate for the breach such as:

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

Other policies to refer to in addition to this policy include the Grievance Policy, Whistleblowing Policy, Public Interest Disclosure Policy, Code of Conduct and Ethics Policy, the Appropriate Workplace Behaviour Policy, Privacy Policy and Procurement Policy.