

# Koalaa Anti-Slavery and Human Trafficking Policy

January 2025

# **Policy Statement**

1.1 This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps that Koalaa has taken to ensure that slavery or slavery-like practices, forced labour, and human trafficking are not taking place within our supply chains or in any part of our business. Koalaa is committed to preventing slavery and human trafficking in our operations and global supply chains, adopting a zero-tolerance approach. We expect all those in our supply chain-including contractors—to comply with the Modern Slavery Act 2015.

1.2 Koalaa requires all employees, contractors, and partners to report any concerns related to slavery or human trafficking. We ensure that all concerns are investigated promptly and appropriate actions are taken.

1.3 Koalaa upholds the principles of the Ethical Trading Initiative Base Code of labour practice, which includes:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used



- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

1.4 We act with integrity and ensure compliance with the Modern Slavery Act 2015 and all relevant legislation and statutory requirements. This commitment is embedded throughout our operations and mirrored in our supplier agreements.

# **Due Diligence**

2.1 To prevent slavery and human trafficking in our supply chains, Koalaa conducts due diligence on all suppliers before entering contracts and on an ongoing basis. This includes annual audits, supplier assessments, and compulsory slavery and human trafficking awareness training for all procurement staff. We include clauses in our contracts that obligate our suppliers to comply with the Modern Slavery Act 2015 and provide for the termination of the contract where non-compliance is identified.

#### Reporting

3.1 Koalaa takes all allegations of slavery and human trafficking seriously. We encourage the immediate reporting of any malpractice or wrongdoing related to slavery and human trafficking within our operations or across our partnerships. Reports should be made to a designated senior manager, ensuring confidentiality and protection for whistleblowers.



# **Effectiveness Review**

4.1 We regularly review the effectiveness of our efforts to combat slavery and human trafficking through internal audits, reviewing supplier compliance, and monitoring remediation actions. We use key performance indicators, such as the number of audits conducted, non-compliance issues identified, and corrective actions taken, to measure our success in ensuring that our supply chains are free from slavery and human trafficking.

# **Board Approval**

Approval:

5.1 This statement has been approved by the board of directors and is signed by the Founder/ Director. It reflects our commitment to improving our practices to combat slavery and human trafficking.

Date: <u>20<sup>th</sup> January 2025</u>

Nate Macabuag (Founder/Director)