

POLICY STATEMENT

Modern Slavery & Ethical Business

WHO WE ARE

Marriott Support Services (Marriott) is a National Disability Insurance Scheme (NDIS) registered provider which operates a range of certified social enterprises that operate within a commercial context and provide employment pathways and opportunities for people with a disability to contribute and lead a meaningful life.

Marriott's social enterprises are commercial businesses with social purpose, designed to generate income for our unfunded or underfunded disability services. As a responsible employer Marriott ensures that its employees, including people with disability receive all their employment entitlements according to their respective awards and skills capability assessments.

MODERN SLAVERY POLICY STATEMENT

In accordance with the Modern Slavery Act 2018, this statement outlines actions Marriott takes and continues to take, to assess and reduce risks of modern slavery within our business and our supply chain, and our plans for review and improvement.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. All of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Marriott recognises that it has a responsibility under the Modern Slavery Act to take a strong approach to reject any forms of modern slavery and human trafficking. **We are committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both in our own business and our supply chain.**

Marriott is committed to limiting the risk of modern slavery occurring in our business, ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our business and supply chain.

We expect our employees and our suppliers to share our commitment to help ensure modern slavery does not exist in our business and our supply chain. This includes any requests or pressure on quotes to either secure business contracts or reduce quotes for scopes of work that impact on award entitlements and obligations to any of our employees including employees with a disability.

Marriott requires all business partners, commercial clients, providers of goods and services and organisations it conducts business with to respect our legal obligations as an employer in remunerating our staff and observing the principles outlined in this Policy Statement.

OUR GOVERNANCE FRAMEWORK

Marriott has a strong corporate governance framework and as part of our commitment to informing our employees and suppliers in modern slavery risks, we review our standard procurement agreements and procurement processes to ensure that we have sound governance processes in place to meet our modern slavery compliance.

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We continue to review our policies and procedures to ensure that we have sound governance processes in place to meet our modern slavery compliance requirements.

Marriott monitors legislative and compliance changes and also conducts reviews of policies, such as, our Code of Conduct and Whistleblower policy, to ensure inclusion of modern slavery clauses where appropriate to increase employee awareness of the risks of modern slavery in our business and our supply chain.

OUR SUPPLY CHAIN

We have a relatively simple supply chain. We procure goods and services needed for our business's day-to-day operations from many contracted and preferred suppliers operating in Victoria and some areas of Australia.

Our supply chain arrangements include suppliers from the following key areas:

- *Corporate and Operational Procurement*, including goods and services required for the support and operation of our NDIS participants and social enterprises areas. The goods and services procured include catering, cleaning, OHS goods and equipment, stationery, uniforms, recruitment, staffing and information technology; and
- *Capital and Property Works*, including building materials, vehicles and equipment, maintenance and construction related services.

Our long-term strategic relationships with key suppliers, provides a stability in our supply chain and procurement processes.

A significant number of our supplier's operations are based in Australia. We believe these suppliers have a lower risk of modern slavery occurring in their supply chains, as their operations are Australian based, they are required to comply with the Modern Slavery Act within their own supply chains. However, our procurement activities do include purchasing goods and services from suppliers who provide potentially high-risk products, such as, catering and food related products, uniforms, OHS equipment, stationery and staffing through agencies.

IDENTIFYING RISKS OF MODERN SLAVERY

In 2020 Marriott undertook a risk assessment review of our key suppliers of goods and services which reviewed suppliers focused on the type of goods and services it delivered for example equipment, uniforms, stationery and agency staff rather than defined by the annual expenditure. We continue to monitor this as part of regular business activities.

We believe there is no risk of modern slavery in our directly employed workforce, as the labour market in Australia is highly regulated, strict regulations apply to the disability and social enterprises sectors, and the presence of unions who represent employees by negotiating employment conditions. Our Whistleblower policy details processes and communication pathways for employees, and suppliers, to disclose misconduct in our business and supply chain without recrimination.

We continue to monitor, review and develop our approach to modern slavery compliance to build capacity within our business to monitor and act on modern slavery risks.

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ETHICAL BUSINESS COMPLIANCE

Legality - Our organisation will:

- Respect the law
- Respect human rights
- Honour its internal policies
- Ensure that its employees receive their legal entitlements
- Ensure that all its business operations are legitimate
- Keep every partnership and collaboration open and transparent
- Business ethics - We always conduct business with integrity and respect to human rights.
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We promote:

- Safety and fair dealing
- Respect
- Anti-bribery and anti-corruption practices
- Anti-slavery

What you can expect from us:

Marriott requires its employees to:

- Act with high ethical standards
- Strive for excellence in our work and services
- Deal fairly and honestly with our vendors, business partners and service providers
- Treat our business partners with courtesy, dignity and without favour
- Communicate intentions clearly and encourage collaboration and teamwork
- Respond to reasonable requests for advice and information without delay
- Comply with Marriott policies and procedures
- Encourage fair and open competition while seeking value for money
- Protect commercial-in-confidence information
- Ask questions when they have doubts about something
- Report issues that do not seem right
- Report any requests or client practices received that indicate worker exploitation in business matters
- Disclose any situation that involves or could be perceived to involve a conflict of interest.
- Decline gifts, financial benefits, or other benefits from a supplier for performing official duties.
- Call tenders when Marriott has a firm intention to proceed to contract.
- Report incentives, gifts, benefits.

What we can expect from you

All providers of goods and services and business partners are expected to observe the following principles when doing business with Marriott Support Services:

- Not to induce or expect that Marriott to quote or perform work that breach any statutory or legal requirements to undercut competitors or market rates to secure business.

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- Understand that our business quotes and transactions are a fair price to enable Marriott to cover its business costs and will not incur financial loss.
- That you provide accurate, concise and reliable briefing, advice and information when required to support our business dealings and relationship.
- Act ethically and honestly in all dealings with Marriott.
- Not engage in collusive practices, including offering Marriott employees or their managers any inducements or incentives designed to improperly influence the conduct of their duties or decision making.
- Disclose any actual or perceived conflicts of interest and report any unethical behaviour immediately.
- Ensure that all contractors you engage to perform work for Marriott are aware of and are required to comply with the Marriot Statement of Business Ethics, and their obligations with the Work Health and Safety Act 2011.
- Not assume you have a claim to intellectual property unless the contract has been negotiated to address the issue.

You must not offer any incentive or attempt to improperly influence our staff in relation to any aspect of their work as a representative of Marriott.

You must not give gifts to our employees, pay or offer to pay for any form of benefit for our employees, including, but not limited to:

- Cash and cash equivalents such as gift vouchers/cards/bitcoin
- Tickets to sporting or social events
- Scholarships
- Sponsorship
- Holidays
- Social meals
- Travel expenses to attend local or interstate meetings or conferences
- Accommodation expenses.

We expect our staff to decline gifts, and financial and non-financial benefits offered during their work.

Why you should comply

Not complying with Marriott business ethical standards and requirements could lead to:

- non acceptance of contract offers
- termination of contracts
- loss of future work and reputation
- where identified statutory breaches will be reported to relevant authorities
- a complaint or report to your company's management/board
- investigation for corruption
- matters being referred for criminal investigation.
- Who to contact If you have any questions regarding this policy statement or, you wish to provide information about a suspected fraud, or a possible breach of the Marriott's modern slavery and business ethics policy, or about any conduct that could involve maladministration, corrupt conduct, serious or substantial waste please email ceo@marriott.org.au