KEYO
AGRICULTURAL SERVICES Ltd

Ethical Trading & Preventing Hidden Labour Exploitation

Policy Statement

We are committed to Ethical Trading and will conduct our business in an ethical, legal and socially responsible manner and take a proactive approach to tackling hidden labour exploitation. This commitment extends to suppliers and other associated external resources with which we chose to do business. We want our customers to be confident that people are treated fairly, are not exploited and are not exposed to unsafe working conditions.

Hidden labour exploitation is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider, including rogue individuals working within these businesses but without the knowledge of the management team. It includes forced labour and human trafficking for labour exploitation, payment for work finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forwards.

Policy Commitments

1. Designate appropriate managers to attend 'Tackling Hidden Labour Exploitation' training and to have responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. The company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation, signs to look for and have signed the appropriate compliance principles.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members
5. Adopt a proactive approach to reporting suspicions of hidden labour exploitation to the Fair Work Agency and police.
6. Provide information on tackling hidden labour exploitation to our workforce though a variety of formats including workplace posters, leaflets, induction and training.
7. Encourage workers to report cases of hidden third-party exploitation, provide the means to do so and investigate and act on reports appropriately.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

Subcontractor Auditing Procedures

We are committed to developing and adopting a proactive approach to contractor audits to ensure total transparency in the supply chain and all contractors are working in line with FWA guidelines and Keyo Agricultural Services Ltd requirements. The development and implementation of the following steps will ensure that all affiliated contractors are compliant with the essential industry standards in order to work as an approved contractor.

- The contractor shall be issued with a pre-audit checklist and asked to supply physical documentary evidence in relation to each action point
- The contractor shall be invited to the Keyo offices on a pre-arranged date where they will be audited in alignment with labour compliance tools and ethical standards
- Following the results of the compliance audit, a full report will be compiled and kept on file
- Any non-compliance shall be detailed in the critical report where clear action points will be detailed along with set dates for completion
- Once all the outstanding action points have been completed the audit can be signed off as completed and a copy kept retained on file.

Supporting Documents

- ETI Base Code
- Modern Slavery Training Presentation
- Whistleblowing Policy
- Recruiter Compliance Principles
- Management Procedure for Labour abuse and modern slavery