

Anti- Human Trafficking & Modern Slavery Policy (Global)



DT Global

1. Background

DT Global delivers international development services globally, working with clients in the public and private sectors to achieve a positive and lasting impact on the lives of people around the world. Freedom from slavery is a fundamental human right, the abuse of which has severe consequences for victims and, often, disproportionately impacts women and girls. This policy lays out DT Global's position against human trafficking and modern slavery.

2. Policy Statement

DT Global conducts its business in an ethical manner and with the highest standards of integrity. We have a 'zero tolerance' approach to any form of modern slavery in our operations or supply chain. Modern slavery encompasses trafficking in persons; slavery; servitude; forced marriage; forced labor; debt bondage; deceptive recruiting for labor or services; and child labor.

All staff, contractors, subcontractors, suppliers, and partners are prohibited from engaging in any practices of modern slavery or human trafficking. Specific examples of prohibited practices include:

- Using forced labor in the performance of any contract;
- Using child labor where children under 18 are subjected to slavery or similar practices or engaged in hazardous work;
- Using recruiters or suppliers that do not comply with local labor laws;
- Using deceptive or coercive practices during recruitment or employment, such as making material misrepresentations about the key terms and conditions of employment;
- Failing to provide an employee contract, recruitment agreement, or other required work document in writing (where one is required by law);
- Destroying, concealing, confiscating, or otherwise denying access to any employee's identity or immigration documents (for example passports or drivers' licenses);
- Providing or arranging housing that fails to meet host country housing and safety standards;
- Charging recruitment fees in any form, to employees; and
- Procuring commercial sex acts.

3. Purpose and scope

The objective of this policy is to apply DT Global's 'zero tolerance' approach to human trafficking and modern slavery across all work that we undertake and to ensure that we take all possible steps to prevent, detect, and mitigate any instances of modern slavery in our business or supply chains.

This policy applies to each DT Global company and other entities (including joint ventures) as well as our staff and representatives of DT Global, and we expect all contractors, subcontractors and business partners that we engage to apply similar standards when working with us.

It is intended that this policy be read in conjunction with the DT Global Code of Business Ethics and Conduct.

4. Policy Management Principles

At DT Global we are committed to supporting human rights and addressing modern slavery by implementing the following management principles:

- Acting ethically, transparently, and with integrity in all business dealings;
- Raising awareness and sensitivity to human rights issues and modern slavery risk indicators with training on this policy and local compliance procedures;
- Ongoing business consultation to identify, assess, and address modern slavery risks;
- Reviewing and updating our policies, practices, and procedures as required to maintain appropriate safeguards against any mistreatment of persons involved in DT Global supply chains or our business;
- Conducting due diligence prior to engaging new suppliers, procuring services, or engaging contractors and consultants;
- Implementing employee and procurement screening processes;
- Lawfully contracting employees in all jurisdictions and meeting DT Global's expectations on employment standards derived from the International Labor Organizations' Declaration on Fundamental Principles and Rights at Work, including diversity, equal opportunity, human rights, freedom of association, employment conditions, and child labor;
- Encouraging reporting of potential, suspected, or actual breach of our 'zero tolerance' policy;
- Investigating all reports of policy breaches and taking appropriate action to ensure accountability;
- Ensuring those who report claims do not face any retaliation in relation to their employment or engagement with DT Global; and
- Building awareness of modern slavery in others and capacity to address modern slavery by sharing our 'Zero Tolerance' approach.

5. How to comply



6. Breaches of Policy

All suspected breaches will be investigated and appropriate disciplinary and remedial action will be taken. Staff who do not strictly comply with this policy may face disciplinary action, including formal warnings and termination.

Reports may be made internally to your manager, supervisor, a consultant's point of contact, senior management, to General Counsel at GeneralCounsel@DT-Global.com, or anonymously to the DT Global Ethics Hotline using the phone, email, mail, URL, or QR code (available on printed collateral). The DT Global Ethics Hotline contact details are set out below:

Reporting Channels	
Dedicated Australian Hotline Phone Number:	1800 765 692
Dedicated USA Hotline Phone Number:	1 (800) 203-7008
Dedicated Spanish Hotline Phone Number:	900 998 400
Any Other Country Hotline Phone Number:	+61 2 9053 9285
Email:	speakup@coreintegrity.com.au
Mail (postal address):	PO Box 895, Darlinghurst NSW, Australia 1300
Weblink to English/Spanish/French reporting form:	qrs.ly/DTGlobalEthicsHotline

7. Availability and Further Information

This policy is available on Teams Global – Info Hub and on the DT Global website <https://dt-global.com/>. For further information contact your manager, Human Resources representative or General Counsel.

The DT Global Code of Business Ethics and Conduct and the following documents also provide useful resources to guide implementation of this policy:

Asia Pacific region

- Modern Slavery Act 2018 (Cth)

Europe

- The Modern Slavery Act 2015 (U.K)

United States

- Federal Acquisition Regulation (FAR): <https://acquisition.gov/far/>
- Trafficking Victims Protection Act (TVPA) <http://www.state.gov/documents/organization/10492.pdf>
- Department of Defense Instruction (DoDI) 2200.01:
<http://www.dtic.mil/whs/directives/corres/pdf/220001p.pdf>
- National Defense Authorization Act (NDAA): <http://www.govtrack.us/congress/bills/112/hr4310/text>

Version Control and Change History

Version Control	Effective Date	Approved by	Amendment
V 1.0	13 August 2020		First Version