

Policy: Anti-Slavery



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. Around 50 million people are estimated to be victims of modern slavery globally, including within Australia.


We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

Many of our customers will be required to report under the Australian Government's Modern Slavery Act 2018, and as a direct supplier to them, the responsibility falls to us for eliminating slavery from our supply stream and reporting our actions and evidence to our customers.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We require the same basic standard from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same standards.

What we do about it

Procedures	SM Automatic Doors has procurement procedures aimed at prevention of modern slavery. All actions must be in accordance with our procurement procedures.
Procurement	Personnel with responsibility for purchasing are responsible for prevention, detection and reporting of modern slavery in any part of our supply chain.
Training	Personnel involved in procurement will receive training on this policy, and on the risk our business faces from modern slavery in our supply chain.
Communication	Our approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
Management	Everyone involved in procurement has responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
	The Manager – Operations has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
	Management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are given any required training.
Commercially confidential information	SM Doors understands that disclosure of supplier's sources is a commercial risk, and we will not pressure suppliers to disclose sources. If they voluntarily disclose sources we will treat the information as commercial-in-confidence, and we will not attempt to procure directly from a disclosed source.
Monitoring	Monitor the Global Modern Slavery Index (MSI) to identify countries with high risk. Monitor news reports of modern slavery involved in any sources of our materials and components. Investigate our sources to determine if we need to take action.
Priority Focus	Within Australia: Potential victims of human trafficking in the labour force
	Internationally: Check "hot spot" countries, industries & ethical sources of materials (eg lithium for batteries)
Reporting	All reports of suspected breaches will be treated seriously, and investigated promptly, confidentially & impartially.
	SM Automatic Doors encourages all workers, including contractors and suppliers, to report suspected instances of modern slavery.
	Managers and supervisors must ensure that workers who make reports, & anyone else who may be involved, are not victimised.
	Reports to customers must be honest, accurate and verifiable.
Investigation	The Manager – Operations will investigate reports thoroughly, impartially, & in a timely fashion.
	The aim is to uncover all of the essential factors in a potential incident of modern slavery, so the situation can be rectified, and recurrence prevented.
Correction & Discipline	Caution must be taken when deciding a course of action, because some actions may cause further harm to the people we aim to protect.
	Priority must be to improve working conditions, and to this end it is best to engage with the supply chain towards improvement.

<p>Accountability. I commit SM Automatic Doors to the implementation of this policy and to provide the resources necessary to achieve it. We will not knowingly participate in the enslavement of people.</p>	<p>Signed: Jeremy Michaelson Director SM Automatic Doors Pty Ltd Dated: 14th April 2021 Next Review: on or before 14th April 2022</p> 
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