

Modern slavery policy

Under the Modern Slavery Act 2018 (Cth), entities carrying on business in Australia with annual consolidated revenue of at least \$100 million must report annually on how they address modern slavery risks in their operations and supply chains. VISAENVOY PTY LTD does not meet the mandatory reporting threshold, but we are committed to the objectives of the Act and publish this policy and voluntary statement.

Purpose

Modern slavery is a crime and a violation of human rights. Under the Act it includes trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour, where children are subjected to slavery or similar practices or engaged in hazardous work. The purpose of this policy is to prevent, detect and respond to the risk of modern slavery occurring within VisaEnvoy, its supply chain or any other business relationship, and to demonstrate our commitment to doing business only with those who share these standards.

Scope

This policy applies to all persons working for or with VisaEnvoy in any capacity, including employees, directors, officers, volunteers, interns, external consultants, third-party representatives, suppliers, sub-contractors and business partners.

Our operations

VisaEnvoy has a zero-tolerance approach to modern slavery. We do not use, and will not tolerate, forced labour or child labour in any part of our business. All of our people are engaged directly in Australia in accordance with the Fair Work Act 2009 (Cth), the National Employment Standards and applicable awards, with lawful wages, superannuation and conditions. As a registered migration practice, verification of identity and the right to work is core to our profession, and we apply the same verification to our own workforce. No person under the minimum legal working age is engaged in our business.

Our supply chain

Our supply chain is small and comprises predominantly Australian professional and office services, including information technology and software, translation and interpreting, courier and office services. We nonetheless recognise our responsibility to guard against labour exploitation in the services we procure.

How we identify, assess and address modern slavery risks

- Onboarding: new suppliers and sub-contractors receive the VisaEnvoy Supplier Code of Conduct, which prohibits child labour and forced labour; adherence is a condition of engagement.
- Risk assessment: suppliers are assessed for labour-standards risk having regard to their industry, workforce profile and location, with closer due diligence for higher-risk goods and services, which may include self-assessments or attestations, copies of a supplier's own modern slavery statement, and details of their supply chain and controls.
- Contracting: our engagements include obligations to comply with the Act, to take reasonable steps to ensure no modern slavery exists in the supplier's own supply chains, and to notify VisaEnvoy of any actual or suspected breach.

- Monitoring: suppliers may be required to confirm compliance and provide supporting evidence; key supplier arrangements are reviewed annually.
- Enforcement: where possible non-compliance is identified we investigate promptly and may require a corrective action plan, increase monitoring, suspend work or terminate the engagement. Any use of child labour or forced labour is treated as a material breach warranting immediate termination, and conduct that may be unlawful is referred to the appropriate authorities.

Reporting concerns

Anyone - employees, contractors, suppliers or external parties - may raise concerns about actual or suspected modern slavery with their manager or any Director, including confidentially or anonymously, under our Whistleblowing Policy. No one will be victimised for making a report on reasonable grounds. All reports are reviewed by a Director, actioned and documented.

Responsibilities and training

The Directors are responsible for this policy, for supplier due diligence and for oversight of any offshore partnerships. All staff are briefed at induction, and periodically thereafter, on recognising and reporting indicators of modern slavery, with particular attention to recruitment-related risks given the nature of our work.

Supporting policies and review

This policy operates alongside our Supplier Code of Conduct, Whistleblowing Policy, Fraud, Bribery, Foreign Bribery and Corruption Policy and the Migration Agents Code of Conduct, available at visaenvoy.com/corporate-responsibility/. It is reviewed at least annually by the Directors and remains available on the VisaEnvoy website.

Name:	Ian Armani	Position:	Director - on behalf of VisaEnvoy Pty Ltd
Signature:		Date:	15 July 2026
Review date:	Annually		