

Argos Promotional Products - MODERN SLAVERY POLICY

Purpose and Commitment

Argos is committed to acting ethically, with integrity, and transparency in all business dealings. We have a zero-tolerance approach to modern slavery, human trafficking, and severe worker exploitation. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. This policy aligns with the international human rights standards and supports New Zealand's ongoing legislative updates regarding supply chain transparency.

Scope

This policy applies to all persons working for Argos or on our behalf in any capacity. This includes:

- Employees at all levels (permanent, fixed-term, and casual)
- Directors and officers
- Agency workers and seconded staff
- Volunteers and interns
- Agents, contractors, external consultants, and third-party representatives
- Suppliers, vendors, and business partners

Definitions of Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. In accordance with international standards and New Zealand guidance, it includes:

- **Forced Labour:** Work performed involuntarily under the threat of penalty or coercion
- **Debt Bondage:** Demanding work from a person to pay off an inflated or inescapable debt
- **Human Trafficking:** Recruiting, transporting, or harbouring people for exploitation using force, fraud, or deception
- **Child Labour:** Exploitation of children for work that deprives them of their childhood, potential, and dignity, or harms their development
- **Worker Exploitation:** Severe breaches of New Zealand employment standards (e.g., underpayment, excessive hours, or retaining passports)

Supplier and Supply Chain Due Diligence

Argos expects the same high standards from all of our contractors, suppliers, and other business partners. To ensure compliance, we will:

- Evaluate the modern slavery risks of any new supplier before entering into contracts
- Include specific anti-slavery clauses in our commercial contracts and supplier agreements as required
- Request suppliers to complete self-assessment questionnaires regarding their labour practices when required
- Reserve the right to terminate our relationship with suppliers if they fail to comply with this policy or fail to rectify severe labour breaches

Employee Responsibilities

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us.

- You must read, understand, and comply with this policy.
- You must avoid any activity that might lead to, or suggest, a breach of this policy.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage.

Reporting and Whistleblowing

If you believe or suspect that a conflict with this policy has occurred, or may occur in the future, you must report it immediately.

- **Internal Reporting:** Notify your direct Manager
- **Protection:** We are committed to ensuring no one suffers any detrimental treatment (including dismissal, disciplinary action, or threats) for reporting in good faith their suspicion that modern slavery is taking place
- **External Reporting:** If severe exploitation or illegal activity is suspected within New Zealand, reports can also be made to Employment New Zealand (0800 20 90 20) or Crimestoppers (0800 555 111)

Training and Awareness

- Training on this policy forms part of the induction process for all individuals who work for us.
- Regular updates will be provided to staff, particularly those working in procurement, supply chain management, and human resources.
- Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship and reinforced as appropriate thereafter.

Governance and Review

The Directors of Argos have overall responsibility for ensuring this policy complies with our legal and ethical obligations.

This policy will be reviewed regularly and may be updated in response to any changes in legislation, regulatory requirements, or best practices.