

Modern Slavery Policy

Standard 1.2

Quality Area 1: Training and Assessment	
Training	
1.2	<ul style="list-style-type: none"> • Identifying and engaging industry, employer, and community representatives • Frequency of engagement • Using feedback

This Policy is designed to govern Pipeline Training Australia compliance with Modern Slavery Laws, including Smart and Skilled Contract clause 34 Modern Slavery, the Modern Slavery Act 2018 (Cth), the Modern Slavery Act 2018 (NSW), Divisions 270 and 271 of the Commonwealth Criminal Code and related legislation. This Policy also supports Standards for RTOs 2025 Standard 2.1, Standard 3.3 and Standard 4.1.

- a) in the procurement of goods and services;
- b) through contract management and monitoring key suppliers refer to the

Definitions

Modern Slavery

Modern Slavery means conduct that constitutes an offence listed in Schedule 2 of the Modern Slavery Act 2018 (NSW), including slavery, servitude, forced labour, debt bondage, deceptive recruiting, forced marriage and human trafficking.

Modern Slavery Breach

A breach of obligations under Smart and Skilled Contract clause 34 will be taken to be a Modern Slavery Breach.

Modern Slavery Laws

- a) the Modern Slavery Act 2018 (Cth);
- b) the Modern Slavery Act 2018 (NSW);
- c) Divisions 270 and 271 of the Commonwealth Criminal Code;
- d) section 176(1A) of the Public Works and Procurement Act 1912 (NSW);
- e) section 438ZE of the Local Government Act 1993 (NSW); and
- f) any other laws, regulations, codes and international conventions aimed at combatting modern slavery, forced labour or human trafficking.

Engaged Entities

Engaged entities include suppliers, contractors, subcontractors, labour hire providers, consultants, agents and third parties engaged by Pipeline Training Australia. Refer to Pipeline's Supplier Register

Related Entities

Related entities include associated entities, subsidiaries, business partners and other entities connected to Pipeline Training Australia operations or supply chains.

Reasonable Steps

Pipeline Training Australia will take reasonable steps to identify, assess, monitor and address modern slavery risks within its operations, procurement activities and supply chains.

Remediation Plan

Where a modern slavery risk or breach is identified, Pipeline Training Australia may implement a remediation plan outlining corrective actions, monitoring requirements, escalation responsibilities and review activities.

Conducting Procurement of Goods and Services

Related documents:

10-REG-004 Approved supplier register (procurement)

The procurement framework is the key mechanism whereby key suppliers are engaged by Pipeline. It is therefore important that the procurement framework provides for due diligence on these suppliers and their compliance with the Modern Slavery Act 2018. Procuring goods and services should be conducted in a way as to ensure that Pipeline Training Australia only sources goods and services from entities that comply with their obligations under the Modern Slavery Act 2018. Also refer to Pipeline – Approved Suppliers Register

The extent of the due diligence conducted in a procurement will depend on the types of goods or services being sourced. Examples of the due diligence that may be conducted include requesting:

- attestation that the supplier complies with the Modern Slavery Act 2018 (e.g. on web);
- a copy of the supplier's most recent modern slavery statement (where applicable), including reviewing the Home Affairs Modern Slavery Register.
- details of structure and operations of their supply chain; and/or
- details of the actions taken by the supplier to manage and address modern slavery risks in their supply chain.
- Contract Management and Monitoring Key Suppliers

All key supplier contracts must contain provisions covering compliance with the Modern Slavery Act 2018. The obligations in the clause should include:

- compliance with the Modern Slavery Act and its reporting requirements (where applicable);
- a requirement to take reasonable steps to ensure that there is no modern slavery in its supply chains or any subcontractor's supply chains; and
- a requirement to notify Pipeline Training Australia immediately if the supplier becomes aware of any actual or suspected breach of Modern Slavery Laws or Smart and Skilled Contract clause 34 Modern Slavery.

Pipeline Training Australia will work collaboratively with key suppliers to identify and manage modern slavery risks and develop commercial and actionable solutions. Pipeline Training Australia will discontinue arrangements with suppliers where it is apparent that those suppliers have not taken reasonable steps to prevent or specifically prohibit modern slavery in their business operations.

Reporting and Escalation Process

All personnel, engaged entities and related entities must immediately report any actual or suspected modern slavery concerns to the Compliance Officer or Chief Executive Officer.

Pipeline Training Australia will:

- assess reported concerns as soon as practicable
- undertake investigation and supplier due diligence activities where required
- escalate significant matters to senior management
- implement remediation plans where appropriate
- maintain records of investigations, actions and outcomes
- cooperate with government agencies and Smart and Skilled contractual obligations where required.

Staff Professional Development

Pipeline Training Australia provides ongoing professional development regarding modern slavery obligations, supplier due diligence and third-party monitoring to:

- procurement staff
- compliance staff
- third-party management staff
- senior management.

Pipeline Training Australia Compliance Officer is responsible for conducting investigations and or audits on key suppliers to monitor compliance with obligations under the Modern Slavery Act 2018.

The Chief Executive Officer is responsible for approving this Policy in accordance with the Pipeline's IMS system and ensuring adequate and robust policies and procedures are in place to ensure the Policy is effectively implemented.



Kieran O'Connor

Chief Executive Officer

08.05.2026