

# Modern Slavery Policy

**LUMIQ PTY LTD**

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## 1. Purpose

LUMIQ PTY LTD, trading as Lumiq, is committed to conducting business ethically, responsibly and with respect for human rights.

This Modern Slavery Policy outlines Lumiq's position on modern slavery and the steps we take to reduce the risk of modern slavery occurring within our business operations, supply chains and contractor relationships.

Modern slavery includes serious forms of exploitation such as forced labour, human trafficking, slavery, servitude, debt bondage, forced marriage, child labour and deceptive recruiting for labour or services.

Lumiq does not tolerate modern slavery in any form.

## 2. Scope

This policy applies to:

- Lumiq's directors, employees, contractors and freelancers
- Suppliers and service providers
- Technology, software, hosting and cloud providers
- Creative, marketing, development and production partners
- Offshore or overseas support providers
- Any other third party engaged by Lumiq to support business operations or client service delivery

This policy applies to all work performed by or on behalf of Lumiq, whether in Australia or overseas.

### **3. Our business**

Lumiq is an Australian digital solutions and marketing business providing services including:

- Digital marketing strategy
- SEO and content strategy
- Google Ads management
- Meta Ads management
- Social media management
- Website design and development
- CRM and marketing system support
- Reporting and analytics
- Creative, photography, videography and content services
- General IT and digital consulting services

Lumiq's direct modern slavery risk is considered relatively low due to the professional services nature of our business. However, we recognise that modern slavery risks may still exist in indirect supply chains, including technology, hardware, outsourced labour, cloud services, offshore contractors, promotional products, content production, apparel, merchandise, office supplies and other third-party services.

### **4. Our commitment**

Lumiq is committed to:

- Acting ethically and with integrity in all business dealings
- Avoiding engagement with suppliers, contractors or partners involved in modern slavery
- Taking reasonable steps to identify, assess and address modern slavery risks
- Working with reputable suppliers, service providers and contractors
- Promoting fair, safe and lawful working conditions
- Ensuring workers are not subject to forced, bonded, trafficked, child or involuntary labour
- Ensuring contractors and service providers are engaged on transparent and lawful terms
- Reviewing supplier and contractor relationships where concerns arise
- Taking appropriate action if modern slavery risks are identified

### **5. Modern slavery risks relevant to Lumiq**

Although Lumiq operates primarily as a professional services business, potential modern slavery risks may exist in areas such as:

Area	Potential risk
Offshore contractors or freelancers	Risk of unfair labour conditions, underpayment, forced work or lack of employment protections
Technology and cloud providers	Indirect supply chain risks through data centres, hardware, software infrastructure and global operations
Website, marketing and development partners	Risk where work is subcontracted without transparency
Creative production	Risk where production, editing, design or content labour is outsourced to low-cost jurisdictions
Promotional products and merchandise	Risk in manufacturing, textiles, packaging and shipping supply chains
Office equipment and electronics	Risk in raw materials, electronics manufacturing and component supply chains
Cleaning, maintenance or facilities services	Potential labour exploitation risk if third-party providers are used

## 6. Supplier and contractor expectations

Lumiq expects suppliers, contractors, freelancers and service providers to:

- Comply with all applicable labour, workplace and human rights laws
- Avoid all forms of modern slavery, forced labour and child labour

- Provide workers with fair, lawful and transparent working conditions
- Pay workers lawfully and fairly
- Ensure workers are free to leave employment or contractor arrangements in accordance with the law
- Avoid deceptive recruitment or coercive labour practices
- Maintain safe working environments
- Be able to explain who is performing the work and whether any work is subcontracted
- Notify Lumiq if they become aware of any modern slavery risk connected to services provided to Lumiq

Where appropriate, Lumiq may require suppliers or contractors to confirm that they comply with this policy.

## **7. Due diligence and risk management**

Lumiq may take reasonable steps to assess modern slavery risks in supplier and contractor relationships, including:

- Reviewing the nature of the service being provided
- Considering whether work is performed in a higher-risk sector or location
- Checking whether suppliers and contractors operate transparently
- Preferring reputable and established service providers
- Asking questions about subcontracting where appropriate
- Reviewing supplier terms, policies or publicly available statements
- Avoiding suppliers where there are credible concerns about unethical labour practices
- Taking action where a modern slavery concern is identified

For larger, higher-risk or overseas supplier relationships, Lumiq may apply additional checks before engagement or renewal.

## **8. Contractors, freelancers and overseas support**

Lumiq may engage contractors, freelancers and overseas support providers from time to time.

When doing so, Lumiq aims to ensure that:

- The scope of work is clearly agreed
- Payment terms are transparent
- The contractor or freelancer has voluntarily accepted the engagement
- Work is not obtained through coercion, deception or exploitation
- The person or provider performing the work is appropriately identified
- Contractors and freelancers are not required to surrender identity documents, pay recruitment fees or work under unlawful conditions
- Any concerns are reviewed and addressed appropriately

## 9. Reporting concerns

Lumiq encourages employees, contractors, suppliers, clients and other stakeholders to report any concern relating to modern slavery, unethical labour practices or exploitation.

Concerns can be reported to:

### **The Privacy Officer / Management Team**

LUMIQ PTY LTD

Email: [hello@lumiq.com.au](mailto:hello@lumiq.com.au)

Phone: **1300 058 647**

Reports will be treated seriously and handled confidentially where practical.

Lumiq will not knowingly penalise a person for raising a genuine concern in good faith.

## 10. Response to modern slavery concerns

If Lumiq becomes aware of a modern slavery risk or allegation connected to its operations, suppliers or contractors, Lumiq may:

- Investigate the concern
- Request further information from the supplier, contractor or service provider
- Suspend or review the relevant relationship
- Require corrective action
- Cease working with the supplier or contractor where appropriate
- Seek external legal or professional advice where necessary
- Report the matter to relevant authorities where required or appropriate

Lumiq's response will depend on the nature, seriousness and credibility of the concern.

## 11. Training and awareness

Lumiq will take reasonable steps to ensure relevant team members understand:

- What modern slavery is
- Where modern slavery risks may appear in digital, technology, marketing and outsourced service supply chains
- How to identify warning signs
- How to report concerns internally
- The importance of ethical supplier and contractor engagement

Training and awareness may be delivered through internal discussions, onboarding materials, supplier review processes or policy updates.

## 12. Review and continuous improvement

Lumiq will review this policy periodically to ensure it remains appropriate for the size, structure and nature of the business.

As Lumiq grows, we may further develop our approach to modern slavery risk management, including supplier screening, contractor onboarding, procurement processes and internal training.

## 13. Responsibility

Responsibility for this policy sits with Lumiq management.

Lumiq management is responsible for:

- Maintaining this policy
- Reviewing supplier and contractor risks where relevant
- Responding to reported concerns
- Promoting ethical business practices across Lumiq's operations

## 14. Compliance with Australian law

This policy has been prepared with reference to Australia's modern slavery framework, including the **Modern Slavery Act 2018 (Cth)**.

Although Lumiq may not currently be required to submit an annual Modern Slavery Statement, we recognise the importance of identifying and addressing modern slavery risks in business operations and supply chains. The Australian Government's guidance encourages entities to assess modern slavery risks and take practical action to address them.

## 15. Contact

Questions about this policy can be directed to:

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