

Modern Slavery Policy



Butn Limited
ACN 644 182 883

Table of Contents

1.	Modern Slavery Policy	1
1.1	Overview	1
1.2	Our structure	1
1.3	How we ensure that Modern Slavery does not take place in our own organisation	1
1.4	Ensuring those who work with our organisation are paid a fair wage	2
1.5	Training and awareness	2
1.6	Methods for our staff and suppliers to report instances of unethical behaviour	2
1.7	How we ensure that slavery does not take place in our supply chain	2
1.8	Reporting	3

1. Modern Slavery Policy

1.1 Overview

Butn Limited (Company or BTN) and its subsidiary companies are committed to acting ethically and with integrity in our business relationships. This includes taking steps to ensure that there is no slavery, servitude, forced or compulsory human labour, human trafficking, child labour, debt bondage and deceptive recruiting for labour (collectively known as “Modern Slavery”) in any part of our business or in our supply chain. We expect our service providers, suppliers and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or within its supply chain. In this modern slavery commitment policy, we describe how Butn ensures that modern slavery and human trafficking are not taking place in our supply chain, or in any part of our business. This policy sets out the principles and controls and procedures we implement to minimise the risk of modern slavey (and ideally remove it completely).

1.2 Our structure

Butn provides transactional funding to small and medium enterprises. This includes factoring, supply chain finance and commission advancement across a wide range of industries, including developing its own fintech solution to extend its funding approach and leverage reach through third party platforms. All staff are located in Australia. We employ staff and use third party contractors (including overseas) to deliver client services. Facilities support roles (e.g. audits, cleaning, and catering) are typically undertaken by third party suppliers.

1.3 How we ensure that Modern Slavery does not take place in our own organisation

When performing our duties, all staff are expected to conduct themselves according to the company values, and thereby meeting Butn cultural goals of collaboration, creativity and clarity. Our company values are:

- Maintaining a laser focus on the customer
- Seek innovation, continual improvement, and learning
- Simple is best
- Engage and retain the best staff
- Concentrate on what’s controllable and important

These values are critical in ensuring we maintain the trust of our staff, our clients, our suppliers, and the markets in which we operate. Butn values are instilled into our staff during induction and our staff and suppliers are held accountable to these values on an ongoing basis. Butn’s Co-Chief Executive Officers holds responsibility for ensuring that the principles contained within our published company values are embedded within our business.

As a minimum, we expect our employees, suppliers, service providers and contractors to:

1. Comply with all applicable laws and regulations;

2. Pay fair wages in line with legislation and awards for the industry and market;
3. Treat those who work for or on behalf of its business with dignity and respect, promoting a safe environment free from discrimination, harassment and victimisation;
4. Oppose Modern Slavery in all forms; and
5. Monitor supply chains on a continual basis for compliance with the above requirements and to promptly investigate any suspected non-compliance of the above within its supply chain.

We extend the expectations we have of our staff to the suppliers with whom we interact, and prohibit illegal and/ or unethical behaviour by any of our suppliers, including any instance of modern slavery, which would be considered a material breach of contract.

1.4 Ensuring those who work with our organisation are paid a fair wage

We commit to ensuring that all employees will be paid at least the minimum Australian Award wage. This is a commitment that extends to all related people, whether they are an employee, contractor, or third-party external Supplier. This is another key step that we take in ensuring that modern slavery does not take place anywhere within our business or supply chain.

1.5 Training and awareness

Butn is committed to providing training to our employees to ensure that our responsibilities with regards to this, and our other policies. This training is delivered to:

- i) lead conversations with our suppliers to explore and comment on the controls they have in place;
- ii) identify potentially non-compliant suppliers and to escalate any concerns; and
- iii) feel empowered to refuse to enter into (or to terminate) supplier contracts if there are any concerns or there is insufficient evidence of steps being taken that are commensurate with the risk of the industry in which they operate.

1.6 Methods for our staff and suppliers to report instances of unethical behaviour

We maintain a Whistleblower Policy which provides a confidential route for any of our staff, contractors or suppliers to report any concerns they have regarding potential human resource issues and possible violations of our values. This includes suspected instances of slavery anywhere in our operations or supply chain.

1.7 How we ensure that slavery does not take place in our supply chain

The IT and finance industries operate in a global supply chain, leveraging many vendors that touch geographies around the world. The steps outlined in this commitment relate to Butn contracted suppliers. Incidental and/or low value goods and services may be provided to us outside of this channel from time to time.

We contract with suppliers (regardless of size, spend or geographic location) who we deem to comply with our Modern Slavery policy, or who are reporting under the requirements of the Australian Commonwealth Modern Slavery Act 2018. Should any of our suppliers be found to be in breach, we consider this to be a material breach of contract. Depending on the gravity of the breach, the matter would be escalated internally, with potential actions ranging from discussions with the supplier around remediation steps, to termination of a contract or cessation of an ongoing business relationship. We have a zero tolerance for suppliers found to be in breach of the Australian Commonwealth Modern Slavery Act 2018 or who operate in violation of our company values and/or policies.

1.8 Reporting

The Company will report any breaches of this policy to its Audit and Risk Committee, who will also consider the risk of bringing any new contractor, supplier or service provider who cannot demonstrate compliance with this policy.