

# Anti-Slavery Policy



*Trading as Expedict, Pacific Transcription and Sterling Transcription*

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## 1 Introduction

Pacific Solutions Pty Ltd trading as Pacific Transcription, Sterling Transcription, and Expedict (Pacific) believes modern slavery is an abhorrent practice and is committed to limiting the risk of modern slavery occurring within our own business or through any other business relationship.

This policy applies to all persons working for or on behalf of Pacific in any capacity. Pacific expects all who have or seek to have a business relationship with us to familiarise themselves with this policy and to act in a way that is consistent with its values.

The term modern slavery refers to any situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception.

Where we have identified higher risk areas in our supply chains, appropriate due diligence has been undertaken to satisfy ourselves that the parties concerned have in place ethical employment practices.

## 2 Preventative Measures

Overall, Pacific considers itself to be at low risk from modern slavery. The majority of our contractors are sole traders and do not have anyone working under them. Furthermore, when applying to work with Pacific, applicants must demonstrate at least 3 years' research, finance or legal transcription experience or 5 years' medical transcription over a range of specialities. They must be computer literate, adept at using the internet to do research, and have an excellent grasp of the English language. These qualities will eliminate most people who would be vulnerable to modern slavery.

As per our confidentiality agreement, contractors must disclose to us when they subcontract to other people. In situations where a contractor engages the service of others and resides in a country known to be vulnerable to modern slavery (e.g. India or Philippines in the case of contractors working with Pacific), Pacific will apply closer scrutiny as detailed below.

To demonstrate its commitment to the principles set out in this policy, maintain transparency and ensure that modern slavery is not taking place in its business or supply chain, Pacific will:

- conduct risk assessments to determine which parts of the business are most at risk from modern slavery (e.g. contractors employing others in vulnerable countries); and
- where subcontractors from vulnerable countries have not published an Anti-Slavery Statement, require them to confirm that they have in place ethical employment practices (These contractors must annually sign a declaration confirming their commitment to treating workers fairly upon initiating work with us.)
- require all contractors to confirm on an annual basis whether or not they subcontract (in which case they will be required to confirm they have in place ethical employment practices); and



- supply this policy to all employees and contractors upon commencement of work with Pacific.

## 3 Reporting Modern Slavery

### 3.1 Internal

Employees who suspect an incidence of modern slavery associated with Pacific or with any of its contractors should raise their concerns via the Feedback Forms avenue. This is a forum in which people can lodge (anonymously if desired) any concern they may have.

### 3.2 External

Contractors and other non-employees should address an email to [iso@pacifictranscription.com.au](mailto:iso@pacifictranscription.com.au) to raise any concerns or suspicions regarding modern slavery.

## 4 Breach of Policy

A breach of this policy will result in termination of the relationship between Pacific and the person(s) or entity involved. Legal steps may be taken and, where relevant or possible, relevant authorities will be notified.

## 5 Relevant Policies and Processes

The following policies and processes show Pacific operates in a fair and ethical manner and thus reflect that we take these issues, including the prevention of modern slavery, seriously.

- Domestic Violence Policy
- Workplace Discrimination and Harassment Policy
- Conflict of Interest Policy
- Data Breach Policy
- Mandatory criminal history check for every worker
- Monthly Compliance Checklist
- Anti-Slavery Policy