

Toll Group

Anti-Human Trafficking and Modern Slavery Policy

Overview

This policy sets out Toll's position against human trafficking and modern slavery.

Scope

This policy applies to all companies and other entities (including joint ventures), employees and representatives of and within the Toll Group (Toll) and we expect all contractors, subcontractors and business partners that Toll engages to apply similar standards when working with us.

Principles

Toll is committed to acting ethically and with integrity and transparency in all business dealings.

Toll respects ethical labour practices and values and promotes diversity. Consistent with these principles,

Toll has a zero tolerance approach to any form of modern slavery in its operations or supply chain. Modern slavery encompasses servitude, forced labour, debt bondage and human trafficking.

All employees, contractors and sub-contractors must not engage in any practices of modern slavery or human trafficking.

This includes:

- Using deceptive or coercive practices during recruitment or employment, such as making material misrepresentations about the key terms and conditions of employment;
- Procuring commercial sex acts;
- Destroying, concealing, confiscating or otherwise denying access to any employee's identity or immigration documents (for example passports or drivers' licenses);
- Providing or arranging housing that fails to meet host country housing and safety standards;
- Employing any child under the age of 15;
- Using forced labour in the performance of any contract;
- Failing to provide an employee contract, recruitment agreement or other required work document in writing (where one is required by law);
- Using recruiters or suppliers that do not comply with local labour laws; and
- Charging employees recruitment fees.

Compliance and Implementation

It is the responsibility of senior management to ensure that this Policy is disseminated and fully understood at every level throughout Group.

All users must abide by the requirements set out in this policy. Users found to have violated or attempted to violate these requirements may be subject to disciplinary action, up to and including termination of employment. Additionally, Toll reserves all rights to take legal action(s), where required.



Breaches of this Policy

Employees must report any alleged breaches of the above requirements to their managers, an Eligible Recipients (as defined in Toll Whistleblower Policy [Toll Whistleblower Policy](#) and to [Group Compliance](#). For serious breaches, including allegations of fraud and improper conduct, users are encouraged to contact the [Toll Disclosure Hotline](#).

All suspected breaches will be investigated, and appropriate disciplinary and remedial action will be taken.

Further Information

For further information contact your manager, your Human Resources representative or Group Compliance.

This document can be found on the [Group Policy SharePoint page](#).

A handwritten signature in black ink, appearing to read "R. Reiter".

Robert Reiter
Group Managing Director
Toll Group
1 July 2026

Related Documents

Employment Screening Policy
Ethical Employment Policy
Diversity & Equal Opportunity Policy
Whistleblower Policy
Toll Code of Practice
Toll Supplier Code of Practice