

Modern Slavery Policy

1. Introduction

The Group is committed to being a responsible corporate citizen. The Group interprets its responsibilities as not only requiring it to abide by the laws respectively binding upon each of its Group entities, but also requiring it to conduct its business in accordance with the ethical principles and practices set out in the Group Code of Conduct/Values (“Code”).

The Board has charged management with and requires that the Code extend to the Group as a whole, including the Board and the Group’s executives and personnel generally so as to create a culture within the Group that promotes ethical and responsible behaviour.

An important element of the Code addresses “Labour”, including especially “forced labour”, and proscribes a range of unacceptable conduct relating to this element. The Code is applicable to Group entities and their people irrespective of any lower local standards and practices in the place of business.

This policy provides further guidance.

2. Principles and Purpose

The Group is committed to conducting its business ethically and with honesty and integrity, with a “zero-tolerance” approach to “Modern Slavery”.

This policy is consistent with the laws and business practices of the Group’s parent company (ie. Australia). To the extent to which the laws and business practices of any place in which a Group member may do business:

- provide a higher standard of ethical probity than the terms of this policy, then to the extent to which they do, that higher standard is to be observed and complied with;
- provide a lower standard of ethical probity than the terms of this policy, then the terms of this policy will apply.

Nothing in this policy absolves a Group Member or a Person from regulatory compliance with any local laws that may apply.

3. Meanings of Terms used in this Policy

“**Modern Slavery**” means:

- slavery and slavery like practices include servitude, forced labour and deceptive recruiting for labour or services;
- criminal, economic or social exploitation of a person’s labour or services and/or their welfare or conditions of living and support ancillary to their labour and services;
- trafficking of people including organ and child trafficking, and debt bondage;
- child labour where the child is not reasonably protected from economic or social exploitation or from performing work that is likely to be hazardous or harmful to the child’s health or physical, mental, spiritual, moral, educational or social development,

and includes “modern slavery” as defined in the Modern Slavery Act 2018 (Cwlth).

“**Group Member**” means the Company and each subsidiary and related company of the Company.

“**Group Supply Chain**” includes all or any part of the sequence(s) of processes and activities (whether by a Group Member or by any third party or other enterprise) involved in the sourcing, procurement, processing, utilization, deployment and/or distribution of materials, products and/or services in connection with the operations or business, or any part of the operations or business, of a Group Member.

“**Due Diligence**” in connection with this policy means the exercise of reasonable enquiry into a Group Supply Chain, having regard to the relevant circumstances applicable to any aspect of the Group Supply Chain, concerning the prospective presence within that Group Supply Chain of Modern Slavery practices.

“**Person**” means each director, officer, employee, agent, contractor and other party acting or purporting to act for or on behalf of a Group Member.

“**Designated Officer**” means an officer designated by the Group to receive information from Persons in the terms of this policy and includes the Company Secretary.

4. Policy Requirements

- I. The Group and each Group Member must:
 - not engage in Modern Slavery;
 - not condone the presence of Modern Slavery in a Group Supply Chain;
 - prudentially take such action as may be within its reasonable power and control (including commercial influence and the utilisation of alternate supply/distribution channels) to reasonably avoid the presence of Modern Slavery in a Group Supply Chain;
 - exercise Due Diligence to better assure compliance with this policy.
- II. Each Person must immediately report to a Designated Officer any knowledge, or reasonably based suspicion, of the presence of Modern Slavery in a Group Supply Chain.

5. Relevant Responsibilities of Persons

It is the responsibility of all Persons to:

- comply with and assist in the implementation of this policy;
- read and understand this policy;
- raise concerns with a Designated Officer about any instance, circumstance or suspicion, based on reasonable grounds and in good faith, that may indicate a breach or potential breach of this policy (refer also to the Group’s Whistleblowing Policy).

6. Reporting and Compliance Obligations

- (a) The Group will comply with any legislative or regulatory reporting obligations relating to the subject matter of this policy.
- (b) The Board charges the CEO and the Company Secretary with responsibility for:

- (i) developing and implementing management procedures and protocols (as appropriate) in furtherance of this policy;
- (ii) reporting to the Board (including as appropriate via the Board Risk Committee) on material matters, risks and issues arising in connection with this policy and any reported prospective breaches of it;
- (iii) supporting the Board with respect to any compliance requirements a Group Member or the Board may have under paragraph 6(a) of this policy.

7. Policy Review

This policy will be the subject of periodic review (including and as appropriate recommended revision) by management, reporting to the Board via the Board Risk Committee), to ensure that the policy at least meets both regulatory and contemporary industry standards and practices, as well as the delivery of the policy's principles and purpose.