

Modern Slavery Policy



1 Policy statement

- 1.1 Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether adults or children, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude or debt bondage, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for Novatti Group Limited and its subsidiaries (the **Company**) or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2 Responsibility for the policy

- 2.1 The Novatti Group Limited Board (Board) has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 This policy cannot be amended without approval of the Board. The Board is also responsible for approving our annual modern slavery statement.
- 2.3 The Board has primary responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it. The Board's responsibilities extend to overseeing the:
 - (a) monitoring and consulting of internal controls and procedures to identify risks of modern slavery practices in our operations;
 - (b) monitoring and consulting with our suppliers, contractors and business partners to identify risks of modern slavery practices in our supply chains;
 - (c) development of measures to assess and address any risks of modern slavery practices, including through due diligence in our contractual relations;
 - (d) monitoring of the effectiveness of those measures;
 - (e) development of appropriate materials for our employees to comply with this policy; and
 - (f) preparation of our annual modern slavery statement in accordance with our disclosure

obligations under Australian modern slavery legislation.

- 2.4 Senior management within the Company is responsible for ensuring those reporting to them understand and comply with this policy and are given adequate information regarding the issue of modern slavery in supply chains, including any areas of our business and supply chains which are identified as at risk of modern slavery practices.
- 2.5 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Board.

3 Compliance with the policy

- 3.1 The principles of this policy must be complied with or incorporated into policies within the business units or subsidiaries within the Company.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You should notify the Board or to your manager (who should then notify the Board) as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you should notify the Board, your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery in whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager or a member of the human resources team immediately.

4 Communication and awareness of this policy

- 4.1 Our commitment to addressing the issue of modern slavery in our business and supply chains should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5 Breaches of this policy

- 5.1 Any employee who breaches this policy may face disciplinary action and any serious breach of this policy may result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.