

Modern Slavery Policy

Brexia Pty Ltd (ACN 628 356 141)

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1. Background & Purpose

Modern slavery is a term which covers a range of exploitative practices including human trafficking, sexual exploitation, forced labor, forced criminality, domestic servitude, child exploitation and forced organ removal.

The Company is committed to limiting the risk of modern slavery within its own business, within its supply chains or through any other business relationship.

The Australian Commonwealth **Modern Slavery Act 2018** took effect on 1 January 2019, and requires The Company to make annual public reports (“Modern Slavery Statements”) on its actions to address modern slavery risks in their operations and supply chains.

The purpose of this Policy is to ensure that the Company:

- is compliant with local, national and other applicable laws and regulations in the areas in which the businesses operate;
- sources products and services in accordance with legal obligations and community expectations; and,
- to act to prevent, mitigate and where appropriate, remedy modern slavery in their operations and supply chains.

This policy should be read in conjunction with the Brexa’s Group Anti-Corruption Policy and the Company’s Modern Slavery Reporting Framework.

2. Definitions

Associated Entities has the meaning given to that term by section 50AAA of the Corporations Act and includes all subsidiaries of Brexa Pty Ltd (excluding overseas entities).

Company means Brexa Pty Ltd ACN 628 356 141 and/or any of its Associated Entities.

Contractors means all contractors, secondees and consultants to the Company (whether paid or unpaid).

Director means a director of Brexa Pty Ltd or an Associated Entity.

Employee means an employee of the Company including Contractors (but excluding on-hire “temps” or similar workers supplied to clients).

Policy means this document or any amendment or replacement document.

Supplier means a person who supplies goods and services to the Company (whether paid or unpaid) and any employees of the Supplier.

3. Policy Application

3.1 This Policy applies to all persons working for or on behalf of, or providing services to, the Company in any capacity, including all Suppliers, Employees, Directors, officers, agency workers, Contractors, consultants and any other third-party representatives.

3.2 The Company expects that all who have, or seek, a relationship with the Company to familiarise themselves with this Policy and to act in a way that is consistent with its values.

3.3 The Company will only do business with Suppliers who fully comply with this Policy, or those who are taking verifiable steps towards compliance.

4. The Company's response to Modern Slavery

- 4.1 All employment with the Company is voluntary.
- 4.2 The Company does not use or condone, child or forced labour in any of its operations or premises and works to ensure these practices are not present in its workforce or supply chain.
- 4.3 The Company does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude.
- 4.4 The Company abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- 4.5 Where the Company is made aware of modern slavery practices in its own business or within its supply chain, the Company will investigate all claims and if valid, resolve the issue in line with the values expressed in this Policy.
- 4.6 The Company provides training with the aim of educating all Employees and Contractors on signs that could indicate modern slavery, due diligence practices for engaging Suppliers, auditing existing Suppliers and what action an Employee or Contractor can take if they have a concern in relation to modern slavery.
- 4.7 The Company conducts risk assessments to determine which parts of the business and supply chains are most at risk from modern slavery to ensure focus on those areas.
- 4.8 This Policy will be used to underpin and inform any statement on modern slavery that the Company is required to produce as a result of legislative requirements in any country in which the Company operates.

5 The Company's Supply Chain

- 5.1 The Company expects its Suppliers to abide by the standards expressed in Annexure A.
- 5.2 The Company engages with Suppliers to promote and support anti-slavery practices throughout the Company's supply chain.
- 5.3 The Company is committed to introducing anti-slavery obligations in all Supplier contracts. As part of their contractual obligations, Suppliers will agree to undertake a process so the Company can gauge the Supplier's ongoing commitment to eradicating modern slavery within its own business and those of its own suppliers.

6 Compliance with this Policy

- 6.1 Compliance with this Policy will be managed on an individual Associated Entity basis. Any queries regarding this Policy should be directed to the CEO/equivalent of the Associated Entity in question (or their designated nominee).
- 6.2 Any breach of this Policy will be taken seriously and dealt with on a case by case basis.
- 6.3 A breach of this Policy by an Employee may lead to disciplinary action being taken in accordance with the Company's disciplinary process. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to the Company's disciplinary procedure.
- 6.4 A breach of this Policy by a Supplier will also be dealt with on a case by case basis. Depending on the behaviour, the Company (at the discretion of the CEO/equivalent of the Associated Entity in question) may choose to adopt a zero-tolerance stance towards the Supplier's behaviour and look at methods of preventing further engagement with the Supplier, or may decide to work with the Supplier so they become compliant with this Policy.

Authorisation	Brexia Board of Directors (formerly OOHPL)	Date: 26th October 2020
History	<p>26th Oct 2020: draft version 1 accepted in principle by Brexia Board (formely OOHPL)</p> <p>6th Nov 2020; draft version 2 circulated for comment by Associated Entities</p> <p>16th November; Final version 3 promulgated</p>	

ANNEXURE A – Standards Expected of Suppliers

<i>No forced or bonded labour</i>	<p>Employment shall be freely chosen. Suppliers shall:</p> <p>(a) not use any type of forced labour (any work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person), bonded labour (work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker’s labour in exchange) or indentured labour (in which an employer forbids workers from leaving employment at the worker’s discretion);</p> <p>(b) respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment; and</p> <p>(c) ensure that workers are free to leave their employer after reasonable notice.</p>
<i>No child labour</i>	<p>Suppliers shall comply with the minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (ILO) Convention 138. Suppliers must be able to verify the age of all employees to ensure compliance. Suppliers must accept the principles of remediation of child and under age workers, and where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.</p>
<i>Wages, benefits, and transparent record keeping</i>	<p>Suppliers must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits. Record keeping must be accurate and transparent. Workers must be provided with written and understandable information about their employment conditions before they enter employment and about their wages for each pay period. Deductions from wages for disciplinary measures or any deductions from wages not provided for by law shall not occur without the express permission of the worker concerned. All disciplinary measures should be recorded.</p>
<i>Working hours</i>	<p>Working hours must comply with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable ILO convention.</p>

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No harassment or abuse Workers shall be treated with dignity and respect. In particular, suppliers will provide a workplace free from harassment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.

Working conditions Suppliers shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied and workers trained in their use. Where suppliers provide accommodation it shall be clean, safe and meet the basic needs of workers. Workers will have access to clean toilet facilities, clean drinking water and, appropriate facilities for food storage and preparation. Workers have the right to refuse work that is unsafe.