

Document Name	BREXA ANZ – MODERN SLAVERY POLICY
Document Number	HRPOL04
Effective From	19 June 2026

TABLE OF CONTENTS

1. PURPOSE	2
2. SCOPE	2
3. DEFINITIONS	2
4. BREXA ANZ COMMITMENTS	3
5. GOVERNANCE & RESPONSIBILITIES	4
6. RISK ASSESSMENT & DUE DILIGENCE	6
7. GRIEVANCE & REMEDIATION	6
8. TRAINING & AWARENESS	6
9. REPORTING & RECORDKEEPING.....	6
10. MEASURING EFFECTIVENESS	6
11. BREACH OF THIS POLICY	7
12. REVIEW	7
13. APPROVAL.....	7
14. ANNEXURE A – STANDARDS EXPECTED OF SUPPLIERS	8

These contents and information are of a confidential nature and under no circumstances are to be shared or released with any party without the permission of BREXA Australia & New Zealand. The information within is for the intended recipient(s) only. Onward referrals to a Related Body Corporate or to a third person can only be done with the authorization of BREXA Australia & New Zealand.

Document: Brexa ANZ – Modern Slavery Policy		Document Owner: Anna Vaughan	
Document No.: HRPOL04	Version No.: 1.0	Issue Date: 19/06/2026	Review Date: 01/05/2027
<i>Printed versions of this document are not controlled. Please refer to the Intranet for the latest version.</i>			Page: 1 of 8

1. PURPOSE

This Policy sets the standards, commitments and behaviours BREXA ANZ expects to prevent, identify, mitigate and remediate modern slavery risks in our Operations and Supply Chains. It supports compliance with the Modern Slavery Act 2018 (Cth) and positions our New Zealand operations for anticipated legislative developments.

BREXA ANZ does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical or emotional punishment or abuse, or involuntary servitude.

BREXA ANZ seeks to do business with Suppliers who comply with this Policy, or demonstrate equivalent standards. Where a Supplier does not fully meet BREXA ANZ's expectations, BREXA ANZ may work with the Supplier to implement verifiable remediation or risk mitigation measures, or may suspend or cease the relationship where appropriate.

This Policy sets BREXA ANZ's overarching commitments and expectations. The BREXA ANZ Modern Slavery Reporting Framework sets out the operational process for supplier risk assessment, due diligence, remediation, recordkeeping, consultation and annual reporting. The annual BREXA ANZ Modern Slavery Statement describes the actions taken during the relevant reporting period and how BREXA ANZ assesses the effectiveness of those actions.

2. SCOPE

This Policy applies to all Workers across the BREXA ANZ group, including persons working for or on behalf of, or providing services to the BREXA ANZ group in any capacity, including employees, contractors, consultants and third-party representatives.

Workers must comply with this Policy at all times.

BREXA ANZ also expects its Suppliers and business partners to operate in a manner consistent with this Policy (or equivalent standards), and to support BREXA ANZ's efforts to identify and manage modern slavery risks within its Supply Chains.

3. DEFINITIONS

Associated Entities includes all BREXA ANZ entities that are owned or controlled by BREXA ANZ.

BREXA ANZ refers to BREXA Pty Ltd (ACN 628 356 141) and its Associated Entities operating across Australia and New Zealand.

Modern Slavery: Describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute Modern Slavery can include, but are not limited to:

- human trafficking;
- slavery;
- servitude;

These contents and information are of a confidential nature and under no circumstances are to be shared or released with any party without the permission of BREXA Australia & New Zealand. The information within is for the intended recipient(s) only. Onward referrals to a Related Body Corporate or to a third person can only be done with the authorization of BREXA Australia & New Zealand.

Document: Brexa ANZ – Modern Slavery Policy		Document Owner: Anna Vaughan	
Document No.: HRPOL04	Version No.: 1.0	Issue Date: 19/06/2026	Review Date: 01/05/2027
Printed versions of this document are not controlled. Please refer to the Intranet for the latest version.			Page: 2 of 8

- forced labour;
- debt bondage;
- child labour;
- forced marriage; and
- deceptive recruiting for labour or services.

All forms of Modern Slavery involve the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain.

Operations: Activities conducted by BREXA ANZ and all entities under the group.

Supply Chains is defined as the products and services (including labour) that contribute to the BREXA ANZ group. This includes products and services sourced in Australia, New Zealand or overseas and extends beyond direct suppliers.

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

High-Risk Supplier means a Supplier that is assessed as presenting a higher risk of modern slavery in connection with the goods or services supplied to BREXA ANZ, having regard to the nature of the goods or services, the location or jurisdiction of the Supplier or its supply chain, the use of labour-hire or subcontracting arrangements, and any other risk indicators set out in Annexure 1 of the BREXA ANZ Modern Slavery Reporting Framework. High-Risk Suppliers must be recorded and assessed in accordance with the Reporting Framework.

Workers: refers to all employees, directors, officers, agency workers, independent contractors and volunteers across the BREXA ANZ group.

4. BREXA ANZ COMMITMENTS

- To ensure that all employment within BREXA ANZ is freely chosen and that Workers are treated with dignity and respect, including compliance with applicable labour laws relating to wages, working hours and working conditions.
- A zero-tolerance approach to Modern Slavery within our own Operations, and a commitment to identifying, addressing and mitigating risks within our Supply Chains.
- Integrate Modern Slavery risk management into procurement, training and consulting services, resource onboarding and contract management.
- Apply a risk-based due diligence approach, including enhanced checks for higher-risk Suppliers and categories (e.g., PPE/uniforms, IT hardware, labour hire).
- Provide appropriate guidance and engagement for identified High-Risk Suppliers as part of due diligence and risk management processes.
- Use our leverage to drive improvement; where severe risk persists without remediation, we will consider suspension or cessation of the relationship.
- Maintain safe, confidential grievance channels for Workers in our Operations and Supply Chains, and protect those who speak up.

These contents and information are of a confidential nature and under no circumstances are to be shared or released with any party without the permission of BREXA Australia & New Zealand. The information within is for the intended recipient(s) only. Onward referrals to a Related Body Corporate or to a third person can only be done with the authorization of BREXA Australia & New Zealand.

Document: Brexa ANZ – Modern Slavery Policy		Document Owner: Anna Vaughan	
Document No.: HRPOL04	Version No.: 1.0	Issue Date: 19/06/2026	Review Date: 01/05/2027
Printed versions of this document are not controlled. Please refer to the Intranet for the latest version.			Page: 3 of 8

- Provide victim-centred remediation where BREXA ANZ has caused, contributed to, or is directly linked to harm.
- Deliver targeted training for relevant teams.
- Track effectiveness through audits, issue closure and Supplier performance reviews.
- Report annually via a single joint Modern Slavery Statement for BREXA ANZ entities and lodge it for publication on the Australian Government Modern Slavery Statements Register within statutory timeframes.

5. GOVERNANCE & RESPONSIBILITIES

Principal Governing Body

- Approves this Policy and oversees Modern Slavery risk management and performance. The annual Modern Slavery Statement must be approved and signed in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

Group Entity Chief Executive Officers

- Each Group Entity Chief Executive Officer (or equivalent) is responsible for ensuring that their entity complies with this Policy and the BREXA ANZ Modern Slavery Reporting Framework.
- Without limiting this responsibility, each Group Entity CEO is accountable for:
 - implementing this Policy and the Reporting Framework within their entity's Operations and Supply Chain activities;
 - ensuring that Modern Slavery risks relevant to their entity are identified, assessed and managed on a risk-based basis;
 - ensuring appropriate Supplier due diligence is undertaken in accordance with the Reporting Framework;
 - approving and overseeing remediation or corrective action plans where risks are identified;
 - approving any decision to continue engaging with a High-Risk or non-compliant Supplier, including ensuring that:
 - the decision is formally documented
 - the rationale for the decision is clearly recorded; and
 - appropriate risk mitigation measures are identified and implemented in accordance with the Reporting Framework
 - ensuring accurate and complete records are maintained, including a High-Risk Supplier Register and supporting evidence; and
 - providing annual confirmation of compliance and required information to support BREXA ANZ's Modern Slavery Statement.
- Group Entity CEOs may delegate day-to-day activities under this Policy but remain ultimately accountable for compliance within their entity.

Finance, Procurement or other relevant business functions responsible for supplier management

- Identify Suppliers and apply a risk-based assessment approach.
- Conduct Supplier due diligence for High-Risk Suppliers, including use of the Supplier Modern Slavery Questionnaire.

These contents and information are of a confidential nature and under no circumstances are to be shared or released with any party without the permission of BREXA Australia & New Zealand. The information within is for the intended recipient(s) only. Onward referrals to a Related Body Corporate or to a third person can only be done with the authorization of BREXA Australia & New Zealand.

Document: Brexa ANZ – Modern Slavery Policy		Document Owner: Anna Vaughan	
Document No.: HRPOL04	Version No.: 1.0	Issue Date: 19/06/2026	Review Date: 01/05/2027
Printed versions of this document are not controlled. Please refer to the Intranet for the latest version.			Page: 4 of 8

- Maintain and regularly update the High-Risk Supplier Register in accordance with the Reporting Framework, including recording due diligence outcomes, risk classifications and any remediation or escalation actions.
- Monitor Supplier performance and escalate concerns where required.

BREXA ANZ People & Culture

- Maintain this Policy and supporting Framework.
- Provide tools, templates and guidance for implementation.
- Coordinate group-level reporting and preparation of the BREXA ANZ Modern Slavery Statement.

Workers Responsibilities

- All Workers are responsible for:
 - complying with this Policy;
 - being alert to potential indicators of Modern Slavery within Operations and Supply Chains;
 - promptly reporting any concerns in accordance with BREXA ANZ's Whistleblower policy or grievance mechanisms; and
 - participating in relevant training where required.

Suppliers and Business Partners

- Suppliers and business partners are expected to comply with this Policy (or equivalent standards) and operate in a manner consistent with applicable Modern Slavery laws.
- Suppliers must cooperate with BREXA ANZ's due diligence processes, including completion of the Supplier Modern Slavery Questionnaire, where requested.
- Suppliers subject to enhanced due diligence will be assessed and classified based on their level of alignment with BREXA ANZ's Modern Slavery expectations, in accordance with the Reporting Framework.
- Suppliers are expected to take reasonable steps to identify and manage Modern Slavery risks within their own Operations and Supply Chains.
- Where risks are identified, Suppliers must work with BREXA ANZ to implement appropriate remediation or risk mitigation measures.
- Suppliers are expected to maintain policies and processes appropriate to the nature and risk of their Operations, and to demonstrate their approach to managing Modern Slavery risks upon request. BREXA ANZ may require evidence of compliance, including policies, risk assessments or other supporting documentation.
- Suppliers are expected to meet the standards outlined in Annexure A – Standards Expected of Suppliers, or demonstrate equivalent practices.

These contents and information are of a confidential nature and under no circumstances are to be shared or released with any party without the permission of BREXA Australia & New Zealand. The information within is for the intended recipient(s) only. Onward referrals to a Related Body Corporate or to a third person can only be done with the authorization of BREXA Australia & New Zealand.

Document: Brexa ANZ – Modern Slavery Policy		Document Owner: Anna Vaughan	
Document No.: HRPOL04	Version No.: 1.0	Issue Date: 19/06/2026	Review Date: 01/05/2027
Printed versions of this document are not controlled. Please refer to the Intranet for the latest version.			Page: 5 of 8

6. RISK ASSESSMENT & DUE DILIGENCE

BREXA ANZ applies a structured, risk-based approach to Supplier risk management in accordance with the Modern Slavery Reporting Framework.

This includes:

- Initial risk screening of Suppliers based on geography, industry, product/service type and workforce characteristics
- Identification of High-Risk Suppliers requiring enhanced due diligence
- Assessment of Supplier practices may include consideration of alignment with the standards outlined in Annexure A.
- Completion of the Supplier Modern Slavery Questionnaire for High-Risk Suppliers
- Assessment of Supplier responses and classification of Suppliers as:
 - compliant
 - partially compliant (requiring remediation); or
 - non-compliant
- Implementation of remediation or risk mitigation actions where required
- Ongoing monitoring and periodic reassessment of High-Risk Suppliers including updating risk classifications and recording any changes in the High-Risk Supplier Register.

All due diligence activities must be documented in the High-Risk Supplier Register.

7. GRIEVANCE & REMEDIATION

BREXA ANZ will maintain confidential whistleblower channels for concerns (anonymous hotline, email and site mechanisms). Allegations are triaged promptly and handled per our investigation procedures. Where harm is identified, remediation may include repayment of fees, contract changes, safer recruitment arrangements, Worker support services and collaboration with NGOs/authorities as appropriate.

8. TRAINING & AWARENESS

Annual Modern Slavery training will be conducted for all employees whose roles are relevant to identifying, managing or mitigating modern slavery risks.

9. REPORTING & RECORDKEEPING

- BREXA ANZ will prepare a single joint Modern Slavery Statement covering relevant BREXA ANZ entities, obtain approval and responsible member signature in accordance with the Modern Slavery Act 2018 (Cth), and lodge the statement within the applicable statutory timeframe.
- Maintain evidence of due diligence, training, incidents and remediation for at least 7 years.

10. MEASURING EFFECTIVENESS

BREXA ANZ assesses the effectiveness of its Modern Slavery risk management through a combination of quantitative and qualitative measures, including:

- the extent to which Suppliers are risk-screened and High-Risk Suppliers are subject to enhanced due diligence;

These contents and information are of a confidential nature and under no circumstances are to be shared or released with any party without the permission of BREXA Australia & New Zealand. The information within is for the intended recipient(s) only. Onward referrals to a Related Body Corporate or to a third person can only be done with the authorization of BREXA Australia & New Zealand.

Document: Brexa ANZ – Modern Slavery Policy		Document Owner: Anna Vaughan	
Document No.: HRPOL04	Version No.: 1.0	Issue Date: 19/06/2026	Review Date: 01/05/2027
Printed versions of this document are not controlled. Please refer to the Intranet for the latest version.			Page: 6 of 8

- the number and nature of Modern Slavery related issues identified and addressed, including remediation outcomes;
- completion of role-appropriate training by relevant Workers; and
- the level of engagement with Suppliers to drive improvements where risks are identified.

11. BREACH OF THIS POLICY

Breaches of this Policy by Workers may result in disciplinary action, up to and including termination of employment or engagement.

Where a Supplier is found to be non-compliant, BREXA ANZ may suspend or terminate the relationship, unless an approved remediation plan is in place.

12. REVIEW

Reviewed annually, or sooner upon significant legislative or organisational changes. Updates require approval by the designated approver.

13. APPROVAL

This Modern Slavery Policy was approved by the Chief Executive Officer of BREXA ANZ, or other authorised delegate, and will be reviewed in accordance with the review cycle set out above.



Signature of Chief Executive Officer

DATED: 19.06.2026

Revision History		COMMENTS FROM REVIEW
1.0	19 June 2026	Initial version for approval.

These contents and information are of a confidential nature and under no circumstances are to be shared or released with any party without the permission of BREXA Australia & New Zealand. The information within is for the intended recipient(s) only. Onward referrals to a Related Body Corporate or to a third person can only be done with the authorization of BREXA Australia & New Zealand.

Document: Brexa ANZ – Modern Slavery Policy		Document Owner: Anna Vaughan	
Document No.: HRPOL04	Version No.: 1.0	Issue Date: 19/06/2026	Review Date: 01/05/2027
Printed versions of this document are not controlled. Please refer to the Intranet for the latest version.			Page: 7 of 8

14. ANNEXURE A – Standards Expected of Suppliers

The following standards outline the minimum expectations BREXA ANZ has of its Suppliers in relation to labour practices and working conditions:

<i>No forced or bonded labour</i>	Employment shall be freely chosen. Suppliers shall: - 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); - 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 - ensure that workers are free to leave their employer after reasonable notice. Suppliers shall not charge workers recruitment fees or related costs, and must ensure that any recruitment agents, labour-hire providers or subcontractors used in connection with goods or services supplied to BREXA ANZ operate consistently with this expectation.
<i>No child labour</i>	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.
<i>Wages, benefits, and transparent record keeping</i>	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.
<i>Working hours</i>	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.
<i>No harassment or abuse</i>	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.
<i>Working conditions</i>	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.

These contents and information are of a confidential nature and under no circumstances are to be shared or released with any party without the permission of BREXA Australia & New Zealand. The information within is for the intended recipient(s) only. Onward referrals to a Related Body Corporate or to a third person can only be done with the authorization of BREXA Australia & New Zealand.

Document: Brexa ANZ – Modern Slavery Policy		Document Owner: Anna Vaughan	
Document No.: HRPOL04	Version No.: 1.0	Issue Date: 19/06/2026	Review Date: 01/05/2027
Printed versions of this document are not controlled. Please refer to the Intranet for the latest version.			Page: 8 of 8