



Modern Slavery Policy

1. Purpose

Alfabs is committed to supporting and respecting the human rights and dignity of our employees and those whom we engage with throughout our supply chain. This Modern Slavery Policy is made pursuant to the Modern Slavery Act 2018 (Cth) and outlines the steps the Alfabs Group (a non-reporting company) has taken, and commits to continuing to take, to ensure that our business and supply chains are free from human trafficking and modern slavery.

2. Policy Scope

This policy applies to all people anywhere within Alfabs including directors, officers, employees, contractors and volunteers of Alfabs and its subsidiaries and/or related entities (collectively referred to in this Policy as "Alfabs"). Our policy serves as a single and consistent benchmark across the Alfabs Group and is designed to comply with the Modern Slavery Act 2018 (Cth) and all other modern slavery related laws relevant to our company locations.

3. Related Documents

Anti-Bribery and Corruption Policy AE-HRM-POL-00017

4. Policy Owner

Group General Manager

5. Definitions

Employee: For the purposes of this policy, an Employee includes:

- Permanent employees: employed directly through the Group as a regular, maximum term, casual, executive, or apprentice/trainee
- Contractors: employed through a preferred recruitment agency including the engagement of an apprentice or trainee.
- Service providers: employed by a Third Party vendor and have access to the Group's IT network and systems.

6. Policy

Group has a zero tolerance approach to any kind of modern slavery. This Modern Slavery statement is made pursuant to the Modern Slavery Act 2018 (Cth) and outlines the steps the Alfabs Group has taken, and commits to continuing to take, to ensure that our business and supply chains are free from human trafficking and modern slavery.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:

- Slavery, servitude (coercing someone to provide services) and forced and compulsory labour;
- Human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
- Committing any offence with the intention to commit human trafficking; or
- Aiding, abetting, counselling or procuring any of the above offences,

All of these practices deprive individuals of their liberty in order to exploit them for personal or commercial gain. Our company values instill in us the obligation to conduct our business with integrity.

We are committed to our company values and behaviours whilst acting ethically, with integrity and transparency in our dealings. We are also committed to implementing effective systems and controls to safeguard our business and supply chain from any form of modern slavery.

As an Australian company with less than AUD\$100 million annual consolidated revenue Alfabs is not classified as a 'reporting entity' but acknowledges our ethical and moral obligation to ensure modern slavery is abolished within our business and supply chain.

Alfabs has and will continue to:

- Undertaken an analysis of the business structure, operations and supply chain
- Assessed risks of modern slavery practices in the operations and supply chain
- Undertaken actions to address risk, including due diligence process
- Undertaken preliminary consultation with key suppliers

Speaking up and Reporting

Principal channels for reporting modern slavery concerns are directly to your manager or any senior manager. The Alfabs Grievance Policy provides guidelines on how to report to both internal and external channels.

We assess and investigate all allegations of modern slavery matters independently and determine whether or not the allegation is substantiated. If substantiated, it must be determined whether the conduct amounts to reportable conduct requiring escalation to an Alfabs Executive, Director or external agency.

Accountabilities**Group General Manager:**

Approving this policy, and any material changes to it

Reporting to the Chief Executive Officer on any breaches or material issues regarding modern slavery matters

Senior Leadership Team

Overseeing the design and implementation of the Group's management framework including modern slavery risk assessment and management

Promoting a culture of compliance with the modern slavery obligations

Providing advice and guidance on modern slavery controls, frameworks and issues

Group People Advisor:

Reporting and escalating modern slavery matters to the appropriate stakeholders

Ensuring this Policy is periodically reviewed and updated

Employees:

Ensure you comply with the principle of zero tolerance towards bribery and corruption

Understand the process for reporting modern slavery matters

Breach of Policy

A breach of modern slavery laws may result in legal or regulatory action including criminal proceedings and the revocation of licences, significant reputational damage and/or financial loss - to employees, Group entities and to the Group as a whole.

A breach of this Policy may be regarded as misconduct, which may result in disciplinary action including termination of employment.

Uncontrolled in Paper Form – Reader Responsibility to ensure latest revision by checking on Mango

Created by: Emily Chambers on Thursday, 23/06/2022

Approved by: Jason Torrance on Tuesday, 10/01/2023

Published by: Emily Chambers on Tuesday, 10/01/2023