

# Modern Anti-Slavery Policy



# Ansarada Modern Anti-Slavery Policy

## Purpose

Ansarada Group Limited (**Ansarada** and **Company**) recognises that modern slavery is a significant global problem, and in accordance with the values enshrined within Ansarada's Code of Business Conduct & Ethics, Ansarada aligns with the current efforts of governments and the private sector to eradicate it, whilst taking all steps to act ethically and with the greatest integrity with respect to all our business relationships.

Modern Slavery in any form can be described as a crime against fundamental human rights. It can take on many forms, and may contain but not be limited to activities such as forced and compulsory labour, human trafficking, servitude and slavery. As a general proposition, all of these activities involve the deprivation of a person's liberty in order to exploit them for personal or commercial gain.

## Our Commitment

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

Ansarada has a zero-tolerance approach to Modern Slavery and we are committed to working ethically and with integrity in all our business relationships. We consistently ensure our disclosure obligations are met in accordance with our obligations under the Australia's Modern Slavery Act (2018) and United Kingdom's Modern Slavery Act (2015), and all other applicable laws and regulations regarding Modern Slavery.

Consistent with the effort Ansarada has made to ensure our zero-tolerance approach translates to 'real world' commercial practice, Ansarada expects its contractors, suppliers, and other business partners to follow the behaviours set by Ansarada. We hold our contractors, suppliers, and other business partners to the exact same standard.

## Application

This Modern Slavery Policy (**Policy**) applies to all persons working for or on behalf of Ansarada, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative and applies to the countries and regions in which we operate.

Ansarada expects all who have, or seek to have, a business relationship with to familiarise themselves with this Policy and to act in a way that is consistent with its value.

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

This Policy will be used to underpin and inform any statement on slavery and human trafficking that the Company is required to produce further to the transparency in supply chain requirements of the Modern Slavery Act 2018 (MSA).

## Responsibility for the Policy

Ansarada has primary and day-to-day responsibility for implementing this policy, ensuring it complies with our legal, regulatory and governance obligations, monitoring its use and effectiveness, dealing with any associated queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensure those who report to them understand and comply with this policy and are provided regular training on the issue of Modern Slavery in supply chains.

## Compliance with the Policy

Ansarada aims to maintain a respectful, harmonious and ethical work environment which upholds our vision, mission and values. We aim to understand, raise and realise the potential of every team, and to do this we must consistently act with integrity. Accordingly, our commitment to this policy, and our expectations of Ansarada's employees are detailed in our company policies and guidelines, which include the **Code of Business Conduct & Ethics**.

### Assessment of Modern Slavery Risks

Suppliers and business partners of Ansarada are subject to various forms of due diligence prior to onboarding, and on a scheduled basis. Through our supplier review process, we regularly monitor the performance of our suppliers – whilst consistently making a call on whether they match our values.

### Reporting of Concerns

All employees of Ansarada are expected to comply with, and hold each other responsible by raising any suspicion of Modern Slavery and by reporting any violations through the following channels:

- a) directly to their manager, or any other member of Senior Management, either through conventional communication (verbal, email); or
- b) in accordance with Ansarada's Whistleblower Policy.

### Management of Breach Events

In the unfortunate event a breach is detected, or we are of the suspicion a breach may have occurred, we will take the following steps:

- i) Evaluate the breach severity and seek external guidance as necessary;
- ii) Exit any breach causing business relationships;
- iii) Report to regulatory authorities as required; and
- iv) Report to the in the next Board Meeting.

## Measuring Effectiveness

Ansarada recognises that preventing modern slavery both now and in the future requires a continuous commitment to improving its modern slavery risk identification and mitigation processes. Year on year, or more frequently as required by events, Ansarada will review this policy as well as associated policies, and shall continue to determine whether Ansarada's Modern Slavery framework needs to be further developed and defined.

## Communication of the Policy

This Policy is made available to all employees, directors or officer of Ansarada, as well as each of Ansarada's key business partners by way of its public website.

Ansarada reserves the right to amend this policy at any time, so as to ensure continued compliance with relevant legislation, and to ensure stakeholder expectations are consistently met.

## **Breach of this Policy**

The breach of this Policy by an employee, director or officer of the Company may lead to disciplinary action being taken in accordance with the Company's Code of Conduct. Serious breaches may be regarded as a gross misconduct and can lead to immediate dismissal.

All employees, directors, officers will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this Policy or any related processes or procedures.

If any part of this Policy is unclear, clarification should be sought from the CEO/Managing Director or Company Secretary.

## **Review**

This Modern Anti-Slavery Policy will be reviewed by the Board on a regular basis. This Policy reflects the Company's current practice and will be updated from time to time to ensure that it remains effective and meets the best practice standards and the Company's needs.

The Policy cannot be amended without approval from the Board.

## **Approval and Adoption**

This Policy was approved and adopted by the Board 30 March 2023.