

AUB Group Limited Modern Slavery Policy

Effective 19 February 2021



1. Purpose

AUB Group Limited and its controlled entities (**AUB Group**) is committed to ensuring that it complies with modern slavery regulations.

AUB Group rejects all forms of modern slavery.

AUB Group acknowledges that modern slavery can occur in every industry, sector and country, including those of AUB Group.

The purpose of this Policy is to set out AUB Group's policy approach to addressing the risk of modern slavery practices within its operations and supply chains. This Policy operates with AUB Group's other policies including in particular its Environmental and Social Governance Policy.

2. Scope

This Policy applies to AUB Group.

AUB Group defines modern slavery in accordance with the Modern Slavery Act to include:

- trafficking in persons (the recruitment, harbouring and movement of a person for the purposes of exploitation, including the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs);
- slavery (where the offender exercises powers of ownership over the victim);
- servitude (where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work);
- forced labour (where the victim is either not free to stop working or not free to leave their place of work);
- forced marriage (where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony);
- debt bondage (the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined);
- child labour (where children are exploited through slavery or similar practices, including for sexual exploitation, or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs); and
- deceptive recruiting for labour or services (where the victim is deceived about whether they will be exploited through a type of modern slavery).



3. Approach to addressing risk

3.1 Operations and Suppliers

AUB Group requires itself and all of its Suppliers to comply with modern slavery regulations in all relevant jurisdictions.

AUB Group will achieve this through its various internal modern slavery compliance measures.

Those measures may include, amongst other things:

1. procedures for procuring and on-going monitoring of Suppliers;
2. internal staff training (refer below); and
3. internal audits.

3.2 Training

Staff of AUB Group will receive induction and on-going training on identifying modern slavery and compliance with modern slavery regulations.

3.3 Continuous improvement

AUB Group's approach to modern slavery compliance is one of continuous improvement, as part of its wider AUB Group Risk Management Framework.

4. Definitions

In this Policy, unless the context otherwise indicates, references to:

- Modern Slavery Act means the Modern Slavery Act (Cth) 2018.
- Suppliers means any organization or person that provides AUB Group with goods or services, including their subcontractors, agents, related entities and consultants.

5. Review

- AUB Group Risk and Compliance will regularly review this Policy to ensure it remains appropriate to AUB Group and its ongoing effectiveness and consistency with AUB Group's objectives and responsibilities.
- Any amendments to the Policy are to be approved by the Board.



- The Group Company Secretary is responsible for the up-keep, distribution and publication of this document.

6. Material Revisions

Version	Approval Date	Effective Date	Details
1.0	19 February 2021	19 February 2021	Policy approved by AUB Group Limited Board.