



Modern Slavery Policy

1. Policy Statement

AUB Group Limited and its controlled entities (**AUB Group**) conducts its businesses to high levels of ethical and professional standards in accordance with relevant laws in the countries that we operate. We have no tolerance for any form of modern slavery within our business and supply chain and are committed to continual improvement in combating all forms of modern slavery such as forced labour, debt bondage, deceptive recruiting, human trafficking and child labour.

To this end, we are committed to implementing and enforcing effective systems and controls, to minimise the risks of modern slavery occurring in our supply chains and operations to the extent possible, and to ensure that any instances with modern slavery reported to AUB are investigated and addressed appropriately.

We are also committed to transparency in our own business and in our supply chains, consistent with our disclosure obligations under modern slavery legislation. We expect our contractors, suppliers, agents, distributors and partners to adopt similarly high standards.

2. Purpose

The AUB Modern Slavery Policy (**Policy**) sets out the principles, policies and approach to addressing the risk of modern slavery practices within its operations and supply chains.

3. Scope of Application of Policy

The Modern Slavery Policy applies to directors, officers, employees and contractors of AUB and its controlled entities (**Designated Persons**).

4. Related Documents

- AUB Modern Slavery Statement
- AUB Vendor Management Policy
- AUB Whistleblowing Policy
- AUB Incident Policy

5. What is Modern Slavery?

The term modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. There is no globally agreed definition of “modern slavery”, but the term describes various practices that seriously exploit people for personal or commercial gain including:

Human trafficking: exploitation of people through forced prostitution, labour, marriage, criminal activities or organ removal. Often threats of violence or coercion are used to harbour or recruit victims of human trafficking.

Slavery: where someone exercises powers attaching to the right of ownership over another person. This includes the power to make the victim an object of purchase.

Servitude: where a person provides labour or services and, because of the use of coercion, threat or deception, that person does not consider themselves free to cease providing the labour or services or to leave the area where they provide that labour or services, and they are significantly deprived of personal freedom.

Forced labour: work performed, or services provided against someone's will and/or under threat of punishment to themselves or their family.

Debt bondage: work performed, or services provided in order to pay off a debt with no control over how the debt is paid off, or employment conditions.

Forced marriage: marriage against someone's will and with no option to leave that marriage. Often will include unpaid domestic labour as part of the forced marriage.

Child labour: where a child under the age of 18 years is exploited for labour. Child labour is in relation to work that deprives children of their childhood, their dignity and is mentally, physically or morally dangerous to children.

While modern slavery is more prevalent in certain countries and across certain industries, it can occur in every country and industry.

6. Roles and Responsibilities

The AUB Board of Directors has overall responsibility for ensuring this Policy conforms to AUB's legal and ethical obligations..

The AUB Chief Legal and Risk Officer (**CLRO**) is responsible for monitoring compliance with the Policy and ensuring that Designated Persons understand its requirements.

All Designated Persons are responsible for modern slavery risk management in their respective areas of the business and for complying with the Policy.

Management at all levels will:

- listen and be approachable to others within AUB's business.
- respond appropriately if they are told something that might indicate an exploitative situation.
- remain alert to indicators of modern slavery.
- use their experience and professional judgment to gauge situations; and
- ensure that those reporting to them understand and comply with this Policy.

7. Communication

AUB will provide training to all employees on this Policy. This will include training on how to identify modern slavery practices and the particular parts of AUB's business and supply chains which are subject to a greater risk of modern slavery practices.

AUB's zero-tolerance approach to modern slavery in its business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with AUB and reinforced as appropriate thereafter.

8. Supplier due diligence and contract terms

Before engaging a supplier, you must always conduct appropriate due diligence. This includes establishing how that supplier identifies, prevents, mitigates and addresses actual and potential adverse human rights impacts in their operations and supply chains, including modern slavery.

All new AUB supplier contracts must include the AUB modern slavery precedent contractual provision, or a clause with similar effect.

9. Remediation

If AUB identifies that it has caused or contributed to an instance of modern slavery, AUB will adopt measures to try to 'make good' all adverse impacts. In addition, where AUB has not directly caused or contributed to modern slavery but is indirectly linked to it by virtue of a business relationship, we will endeavour to use any leverage to work with the entity that caused the impact, to prevent or mitigate the harm and its recurrence. If this is unsuccessful, we will always consider ending the business relationship

10. Review

This policy will be reviewed periodically by the AUB Group Risk and Audit function, with any material changes approved by the AUB Board.

11. Breach Reporting

Any breaches of this policy should be reported in the first instance to the CLRO who will escalate to the AUB CEO and reported to AUB Board.

Version	Approval Date	Effective Date	Details
1	19 February 2021	19 February 2021	Policy approved by the AUB Group Limited Board
2	7 December 2023	7 December 2023	Policy amended to provide greater details on roles/responsibilities, communication, supplier due diligence and remediation.