

MODERN SLAVERY POLICY AND CODE OF CONDUCT

PURPOSE

Mainbrace acknowledges the propensity for modern slavery practices as defined in the Commonwealth Modern Slavery Act 2018 (the Act) to potentially occur in our operations and extended supply chains. We understand and accept our continuing obligation to assess and address these risks.

WHAT IS MODERN SLAVERY?

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour where children are subjected to slavery or similar practices, or engaged in hazardous work.

POLICY OBJECTIVES

The objectives of this policy are to:

- Affirm Mainbrace's commitment to our obligations under the Modern Slavery Act 2018 (Cth)
- Ensure that Mainbrace, our employees, consultants, subcontractors and suppliers and the extended supply chain act to prevent, mitigate and where appropriate, remedy the presence of Modern Slavery practices in our operations and supply chains.

POLICY COMMITMENTS

Our modern slavery strategy is built on progressive leadership within our business to increase awareness of the issue which together with a framework of continuous improvement in our policies and processes and the on-going education and training of our employees will together serve to exclude modern slavery practices from our operations and supply chains.

Our key actions are to:

- provide modern slavery awareness training for those responsible for procurement strategies within the business;
- develop our procurement policies and procedures to reduce the likelihood of modern slavery practices in our supply chains,
- continuously assess the risk of modern slavery in our primary supply chain and also in those trades that potentially present a higher risk of engaging in modern slavery practices;
- develop and promote our modern slavery whistle-blower policy in all our workplaces;
- take appropriate action to remedy any occurrence of modern slavery practices if found in our operations or extended supply chains; and
- routinely measure the effectiveness of our actions and put in place business improvement initiatives to mitigate modern slavery practices where warranted.

POLICY CODE OF CONDUCT

Mainbrace, our employees, consultants, subcontractors and suppliers are obliged to comply with the Modern Slavery Code of Conduct set out as follows:

CONDUCT

Any person or entity employed by Mainbrace in our operations and supply chains are obliged to:

- not participate in or knowingly allow the movement of people into, out of, or within Australia through the use of coercion, threats or deception for exploitive end purposes;
- not participate in or knowingly allow any person have rights of ownership over another person;
- not deprive or knowingly allow any person to be in a condition of servitude where they are deprived of their personal freedom;
- not participate in or knowingly allow any person to enter a marriage without freely and fully consenting;
- not participate in or knowingly allow any person to prevent another from ceasing their provision of labour or services;
- not participate in or knowingly allow any person to retain the services of a third person as security for a real or purported debt where the conditions are manifestly excessive or not defined;
- not participate in or knowingly allow any person to deceive another about the types of services or labour they are being engaged for;
- not participate in or knowingly allow any person to employ child labour

COMPLIANCE

Mainbrace are committed to our obligations under the Act and any person or entity employed by Mainbrace are duly obliged under this policy to act to prevent, mitigate and where appropriate, remedy the presence of Modern Slavery practices in our operations and supply chains.

A breach of these obligations by any person or entity employed by Mainbrace and a failure by the person or entity to remedy the breach can result in the termination of their current engagement, exclusion from future employment opportunities and referral to the relevant authorities.

NOTIFYING CONCERNS

Suspected findings of modern slavery practices are to be reported in accordance with our Modern Slavery Whistle Blower Policy.

The policy is available to potential whistle blowers via Mainbrace's website and for Mainbrace employees via Mainbrace's "MILA" intranet system.

AVAILABILITY OF POLICY AND CODE OF CONDUCT

This policy and code of conduct will be made available to potential whistle blowers via Mainbrace's website and for Mainbrace employees via Mainbrace's "MILA" intranet system.

All persons affected by this policy will be updated if there is any future amendment to this policy.