

SUMMERSET GROUP HOLDINGS LIMITED

MODERN SLAVERY POLICY

1. Policy statement

Summerset Group Holdings Ltd and its subsidiaries (**Summerset**) is committed to actively identifying and seeking to minimise or eradicate all forms of modern slavery in its supply chain.

The purpose of this policy is to:

- (a) set out how Summerset will seek to ensure that the goods and services purchased through Summerset's supply chains are ethical and minimise or eradicate Modern Slavery risks;
- (b) set out the responsibilities of Summerset, our employees, operations and suppliers in observing and upholding Summerset's position on modern slavery; and
- (c) provide information and guidance to Summerset's employees on how to recognise and deal with Modern Slavery issues.

2. Who is covered by the policy?

This policy applies to all directors of the Board, management, staff and contractors engaged and undertaking work on behalf of Summerset, wherever they may be located (collectively referred to as **personnel** in this policy).

We expect our suppliers to uphold the same standards and are committed to working in partnership with our suppliers to observe Summerset's position on modern slavery.

3. Meaning of modern slavery

The term **Modern Slavery** describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Specifically, Summerset defines **Modern Slavery** as including the following types of serious exploitation as defined in the *Modern Slavery Act 2018* (Cth):

- (d) **human trafficking** – recruiting, harbouring and moving persons for exploitation through modern slavery;
- (e) **slavery** – exercising powers of ownership over persons, including the power to make a person an object of purchase and use their labour in an unrestricted way;
- (f) **servitude** – the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work;
- (g) **forced marriage** – the victim is made to marry or does not or cannot understand the nature and effect of the marriage ceremony;
- (h) **forced labour** – where people are forced to do work against their will under threat of punishment;
- (i) **debt bondage** – the victim's services are pledged as security for a debt that is manifestly excessive, or the victim's services are not applied to reduce the debt, or the length and nature of the services are not limited and defined;
- (j) **deceptive recruiting for labour or services** – the victim is deceived about whether they will be exploited through a type of modern slavery;

- (k) **the worst forms of child labour** - exploiting children through slavery activities, using or procuring a child for sexual activities and illicit activities, and engaging children in work which is likely to harm their 'health, safety or morals'; and
- (l) offences relating to use of children for production of child abuse material and related activities.

Modern Slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers, though these practices are also harmful and may be present in some situations of Modern Slavery.

4. Standards required of Summerset personnel

Summerset endeavours to ensure that we, and our personnel, comply with all laws related to Modern Slavery, within our operations, activities and supply chains, endeavouring to ensure all procurement activities minimise or eliminate Modern Slavery risks. All personnel who procure goods, services, consultancy and capital work are expected to take reasonable steps to:

- (a) examine and consider the potential supplier, including the original source (where possible) of the product and whether there is a risk of Modern Slavery (of any kind) based on the industry, location of the supplier or other factors;
- (b) engage with suppliers at the outset of our business relationship with them both to convey to them Summerset's anti Modern Slavery position and gain an understanding of the measures taken by them to ensure Modern Slavery is not occurring in their businesses and their supply chain;
- (c) consider contractual provisions for suppliers to confirm their adherence to this policy and accept Summerset's right to audit their activities and relationships, for those of our suppliers most at risk of Modern Slavery; and
- (d) ensure that the procurement process is documented in such a way as to be able to reasonably demonstrate that decisions and purchases were made in accordance with all laws relating to Modern Slavery and this policy.

5. Standards required of suppliers

Suppliers are expected to comply with Summerset's Supplier Code of Conduct, including the requirements to:

- comply with all laws applicable to Modern Slavery;
- take reasonable steps to monitor and address Modern Slavery risks within their supply chains;
- allow Summerset to carry out reasonable pre-screening, supplier due diligence, and/or audit activities in order to analyse and monitor Modern Slavery risks; and
- notify Summerset immediately if they become aware of any form of modern slavery in their business or supply chain.

6. Breaches by suppliers

Summerset reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier Code of Conduct. Suppliers who cannot demonstrate progress towards conformity with these expectations will be viewed less favourably in future contract negotiations. If a violation of the Supplier Code of Conduct is identified and validated with a supplier, then Summerset will, where appropriate, engage with the supplier to endeavour to agree the corrective actions required within an appropriate time frame.

7. How to raise a concern

Summerset supports and encourages people to raise genuine concerns about Modern Slavery matters, whether identified by or affecting them in the workplace, or in relation to Summerset's business or its supply chains. We encourage people to report any instances that suggest:

- (a) that there is a risk, both potential or actual, of Modern Slavery occurring in the supply chain, activities or recruitment function of Summerset or its suppliers; and
- (b) that suppliers or third party contractors engaged by Summerset are engaging in, potential or actual Modern Slavery.

Summerset seeks to ensure that people can raise concerns without fear of any detrimental treatment as a result of reporting genuine concerns in good faith under this policy, even if they turn out to be mistaken. Detrimental treatment includes that their future employment prospects will or may be adversely affected or other unfavourable treatment connected with raising a concern.

While people are encouraged to put names to allegations in order to make the investigation process most effective, Summerset will accept concerns raised anonymously.

7.1 Actions to report Modern Slavery: Internal

If at any time you:

- (a) have any questions about the application of this policy; or
- (b) need guidance or assistance in a particular case,

you should in the first instance consult your line manager.

If you wish to report a concern in relation to Modern Slavery or a breach of the Supplier Code of Conduct, including any conduct that may be or result in a breach of this policy, you may raise it with the Risk and External Reporting Manager or Head of Legal. If you believe that serious wrongdoing has occurred and wish to make a protected disclosure, you may do so in accordance with Summerset's Whistle Blowing Policy.

7.2 Actions to report Modern Slavery: External

Representatives of our suppliers or other people not employed by Summerset can report concerns to their Summerset relationship manager or, if they wish to make a protected disclosure concerning serious wrongdoing, they may do so in accordance with Summerset's Whistle Blowing Policy.

8. Who is responsible for the policy?

This policy is endorsed by Summerset's Board of Directors, who have overall responsibility for ensuring this policy complies with Summerset's legal and ethical obligations, and that all those under our control comply with it. The Risk and External Reporting Manager has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate training on it at appropriate intervals. Internal control systems and procedures, will be subject to regular reviews to provide assurance that they are effective in countering Modern Slavery.

9. Review

The Modern Slavery Policy will be reviewed regularly to ensure it remains relevant, current and compliant with the *Modern Slavery Act 2018* (Cth), best practice under that Act, and relevant activities and functions.