



# Modern Slavery Policy

Trajan Group Holdings Limited

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## 1. Purpose

- 1.1 Modern Slavery is a crime and a violation of fundamental human rights. It describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.
- 1.2 It takes various forms, including the following (non-exhaustively):

<b>Slavery</b>	Exercising powers of ownership over a person.
<b>Servitude</b>	The obligation to provide services is imposed by the use of coercion.
<b>Forced or compulsory labour</b>	Work or services are not undertaken voluntarily and are exacted from a person under the menace of threat or punishment.
<b>Human trafficking</b>	Arranging or facilitating the travel of another person with a view to their exploitation, including for example, through deceptive recruitment or coercion.
<b>Bonded labour or debt bondage</b>	Work or services are demanded for repayment of a debt, often where the debt and the duration of the services may not have been defined.

- 1.3 The above range of rights abuses affect both adults and children and all have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.4 This policy affirms the commitment of Trajan Group Holdings Ltd ACN 152 617 706 and its subsidiaries (**Trajan**) to respect human rights and take meaningful action to address the risks of modern slavery which arise in connection with its business.
- 1.5 With respect to modern slavery, the purpose of this policy is to:
- (a) outline Trajan's approach to preventing, detecting and responding appropriately to modern slavery risks in its operations and supply chain;
  - (b) describe the standard of behaviour that Trajan expects from Trajan Employees and Associates (as defined in section 2) and its contractors, suppliers and other business partners;
  - (c) set out the process for dealing with any identified concerns; and
  - (d) support Trajan's values of integrity, respect, empowerment, discipline and diversity.

## 2 Application of the policy

- 2.1 This policy applies to all persons working for Trajan or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents and contractors (together, "**Trajan Employees and Associates**").
- 2.2 This policy does not form part of the contract of employment or engagement between Trajan and Trajan Employees and Associates, and Trajan may amend it at any time.

### 3 Policy statement

- 3.1 Modern slavery breaches the most fundamental freedoms and human rights of individuals. Trajan rejects all forms of modern slavery and recognises that modern slavery is never acceptable in any of its forms.
- 3.2 Trajan is committed to acting ethically and with integrity in all of its business dealings and relationships. Trajan continues to implement and enforce effective systems and controls which are designed to prevent, detect and address modern slavery risks in its own business or in any of its supply chains. Trajan is committed to taking steps to contribute to the global effort to eradicate modern slavery.
- 3.3 In performing duties and functions for Trajan, the behaviour and conduct of all Trajan Employees and Associates must be consistent with Trajan’s commitment to address the risks of modern slavery that it may be exposed to in connection with its business. This includes:
- (a) acting ethically and with integrity at all times;
  - (b) raising concerns relating to modern slavery when they are identified (see section 5);
  - (c) treating any concerns or issues raised about modern slavery with seriousness, respect and sensitivity; and
  - (d) where required, assisting the Modern Slavery Officer (referred to in section 4.2 below) in investigating and responding to any concerns regarding modern slavery.
- 3.4 Trajan also expects the same high standards from its contractors, suppliers and other business partners. To continue to do business with Trajan, contractors, suppliers and other business partners are expected to take practical and effective steps to mitigate the risks of modern slavery from occurring in their operations and supply chains. If Trajan considers that a contractor, supplier or other business partner is failing to respond adequately to modern slavery risks, Trajan may elect to cease doing business with that entity or require remediation measures to be taken as a precondition to continued engagement.
- 3.5 In addition to the requirements set out in this policy, Trajan may also include contractual terms in supply and services agreements and other relevant contracts to require contractors, suppliers and other business partners to take appropriate steps to identify, assess and address risks of modern slavery practices in their operations and in their own supply chains. Trajan expects that its suppliers will hold their own suppliers to the same high standards.

### 4 Responsibility for the policy

- 4.1 The Trajan board of directors (**Board**) has overall responsibility for ensuring this policy complies with Trajan’s legal and ethical obligations, and that all those under Trajan’s control comply with it. The Board is also responsible for approving Trajan’s annual modern slavery statement published in accordance with the Australian Modern Slavery Act 2018 (Cth).
- 4.2 Trajan’s General Counsel or that person’s delegate from time to time is appointed as Trajan’s “**Modern Slavery Officer**”. The Modern Slavery Officer will have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it. The Modern Slavery Officer’s responsibilities extend to:
- (a) monitoring internal controls and procedures to ensure they are able to adequately identify risks of modern slavery practices in Trajan’s operations;

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- (b) developing measures to assess and address any risks of modern slavery practices in Trajan’s supply chain, including through due diligence of Trajan’s suppliers;
- (c) monitoring the effectiveness of those measures; and
- (d) ensuring that appropriate training materials and programs are made available for Trajan Employees and Associates to comply with this policy.

4.3 Trajan expects management at all levels to:

- (a) listen and be approachable to others within Trajan’s business regarding modern slavery risks;
- (b) respond appropriately if they are told something that might indicate an exploitative situation;
- (c) remain alert to indicators of modern slavery;
- (d) use their experience and professional judgment to gauge risky situations;
- (e) ensure those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery, including any areas of Trajan's business and supply chains which are identified as at risk of modern slavery practices; and
- (f) seek guidance from the Modern Slavery Officer if they are unsure about a particular situation or the application of this policy in relation to modern slavery risks.

4.4 Preventing, detecting and addressing modern slavery risks is the shared responsibility of all those who are bound to comply with this policy. All Trajan Employees and Associates are required to:

- (a) ensure they have read, understood and comply with this policy;
- (b) avoid any activity that might lead to, or suggest, a breach of this policy; and
- (c) follow the process set out in section 5 to report any concerns about possible modern slavery in Trajan’s operations or supply chain.

4.5 All Trajan Employees and Associates are also invited to comment on the policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Modern Slavery Officer.

## 5 Reporting concerns about modern slavery

5.1 Trajan Employees and Associates are expected to raise concerns about any issue or suspicion of modern slavery in any parts of Trajan’s business or supply chains at the earliest possible stage. Concerns may be raised by speaking with the Modern Slavery Officer, or alternatively, Trajan Employees and Associates can raise any concerns in accordance with Trajan’s Whistleblower Policy available [here](#). When making a report, Employees and Associates should provide as much information as possible, including details of the people or companies involved, where the conduct is believed to be occurring and how it relates to Trajan’s products or services or other business activities. Reports may be made on an anonymous basis.

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- 5.2 The Modern Slavery Officer is also available to answer any questions that a Trajan Employee or Associate might have in respect of the operation of this policy.
- 5.3 Trajan encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Trajan is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of Trajan’s business or in any of its supply chains. Trajan’s Whistleblower Policy explains in further detail the protections that are available to anyone who raises a concern under that policy.
- 5.4 It is the responsibility of the Modern Slavery Officer to oversee the handling of any report made under this Policy.
- 5.5 Where a risk of modern slavery is reported or otherwise identified, the actions which Trajan will take to mitigate the risk will depend on the circumstances including:
- (a) the nature and severity of the identified risk;
  - (b) whether managing the risk is within Trajan's direct control;
  - (c) if managing the risk is outside Trajan's direct control, whether Trajan is able to appropriately use its influence and leverage to assist in mitigating the risk; and
  - (d) Trajan's ability to effectively implement and monitor the actions to mitigate the risks.

## **6 Training, communication and monitoring of this policy**

- 6.1 Trajan has implemented, and will strive to find ways to improve, its modern slavery training program for Trajan Employees and Associates. This training covers ways to identify modern slavery practices and the particular parts of Trajan’s business and supply chains which are subject to a greater risk of modern slavery practices. This training also forms part of the induction process for new Trajan Employees and Associates where relevant to their role.
- 6.2 In implementing its commitment to addressing the issue of modern slavery in its business and supply chains, Trajan will communicate to Trajan Employees and Associates, business partners, customers and suppliers (as applicable), Trajan’s expectations with respect to modern slavery.
- 6.3 Trajan will review this policy annually. Trajan will provide appropriate information and/or training on any changes that may be made.

## **7 Breaches of this policy**

- 7.1 Any Trajan Employee and Associate who breaches this policy will face corrective or disciplinary action, which could result in termination of employment or other arrangements, on grounds including for serious misconduct.
- 7.2 Trajan may terminate its relationship with other individuals and organisations working on its behalf or with which Trajan has a commercial relationship if they breach this policy.

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