

Modern Slavery Policy

1. Purpose of the Policy

This Policy confirms MPower Group Limited's (**MPower** or the **Company**) commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our operations and our supply chain.

If this Policy is breached, MPower will act quickly as practicable to remedy our adverse impacts on workers, individuals or communities and will engage directly with affected stakeholders.

The Australian Modern Slavery Act 2018 took effect on 1 January 2019 and requires companies with a turnover >\$100m to make annual public reports (Modern Slavery statements) to address modern slavery risks in their operations and supply chains. Whilst MPower is not required to comply with the Act, MPower seeks to abide by the key principles contained in the Act as they align with MPower's values.

The purpose of this Policy is to ensure that MPower:

- is compliant with local, national, and other applicable laws and regulations in the areas in which the business operates;
- sources products and services in accordance with legal obligations and community expectations; and
- acts to prevent and mitigate modern slavery in its operations and supply chains to the extent practically possible,

while also noting the nature and scale of the MPower business.

2. Scope

This Policy applies to all MPower's operations and supply chains. MPower rejects all forms of modern slavery and the deprivation of a person's liberty by another in order to exploit them for commercial gain which is a violation of an individual's fundamental human rights.

This Policy should be read in conjunction with MPower's Code of Conduct, Anti-Bribery and Corruption Policy, and Whistleblower Policy.

3. Application

Mpower seeks to abide by the following principles:

- Mpower is firmly committed to maintaining the highest standards of ethics, honesty, openness, and accountability. Mpower recognises that all personnel have an important role to play in achieving this goal.
- Mpower will not use any suppliers that use any type of human trafficking, slavery, servitude, forced labour, debt bondage or child labour.
- Mpower respects the freedom of movement of its workers and does not restrict their movements by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment.
- Mpower shall comply with the minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (ILO) Convention 138. Suppliers must be able to verify the age of all employees to ensure compliance. Suppliers must accept the principles of remediation of child and underage workers, and where such labour is discovered, suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.
- Mpower suppliers must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits.
- Working hours must comply with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such laws by the applicable ILO convention.
- No harassment or abuse – workers shall be treated with dignity and respect. Suppliers will provide a workplace free from harassment, including physical, sexual, verbal, or visual behaviour that creates an offensive, hostile, or intimidating environment.
- Freedom of association, grievance mechanisms and recourse – suppliers shall respect the rights of workers to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country of operation.

4. How to raise a concern

Personnel who suspect there has been a breach of this Policy must notify a member of the Senior Leadership Team immediately. An individual can make an anonymous disclosure in accordance with MPower's Whistleblower Policy. Any breach of this Policy will be taken seriously and conduct in contravention of this Policy may be regarded as misconduct, leading to disciplinary action. An individual may also be exposed to criminal or civil liability for breaching the Act.

5. Training and communication

Training on this Policy forms part of the induction process for all new employees. MPower aims to communicate its zero-tolerance approach to modern slavery to all key suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.

6. Who is responsible for the Policy?

The directors have overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all personnel comply with it.

The Chief Executive Officer has primary day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

7. Monitoring and review

The Chief Executive Officer will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible after the Board of Directors has approved the changes.

Last updated: 17 June 2021