



# Anti-Modern Slavery & Human Trafficking Policy

## 1. Introduction

This policy applies to all employees. For the purpose of this policy, an “employee” includes:

- permanent employees (including full time and part time);
- fixed-term employees;
- casual employees; temporary agency staff; and
- contractors,

engaged by the BOWE Project and its subsidiaries. It extends to any Nexsphere staff working on BOWE.

Suppliers and Partners (as defined in this Policy) are expected to comply with the Policy as a condition of engagement.

*Suppliers* means an organisation which or a person who supplies BOWE with goods or services, and includes their officers, directors, contractors and their subcontractors. Suppliers includes third party providers, their agents, related entities and consultants.

*Partners*, when used in this Policy, means any organisation or person which/who is participating in a joint venture or joint research initiative with, or on behalf of, BOWE.

The Policy should be read in conjunction with other policies including: Procurement Policy, the Code of Conduct and Anti-Bribery & Corruption Policy.

## 2. Purpose

Our Anti-Modern Slavery and Human Trafficking Policy outlines how BOWE and its subsidiaries approach ethical sourcing and the prevention of worker exploitation. Our approach includes the identification and management of the risks of modern slavery and human trafficking within our operations and supply chains.

BOWE is committed to protecting all human rights and play its role in addressing the crimes of human trafficking and modern slavery.

### **3. Legislative Context**

The *Modern Slavery Act 2018 (Cth)* (**Act**) requires entities earning over AU\$100 million in consolidated revenue to report on the actions they have taken to assess and address risks of modern slavery in their operations and supply chain.

The Act seeks to address the issue of modern slavery in supply chains through increased transparency and corporate integrity.

BOWE does not presently meet the criteria to complete and lodge an annual Modern Slavery Statement to the Australian Border Force. BOWE will ensure that it meets the legislative requirements as its business scales and grows.

### **4. What is Modern Slavery and Human Trafficking?**

Modern slavery encompasses all types of slavery and servitude, including forced or compulsory labour, debt bondage, indentured servitude, forced marriage and the worst forms of child labour.

Human trafficking refers to the recruitment, transportation, transfer, harbouring, or receipt of persons for the purposes of exploitation, including modern slavery, by means of the threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability, or the giving of payments or other benefits.

### **5. Understanding your responsibilities**

All employees have a responsibility to prevent, identify and report risks or suspected incidents of modern slavery and human trafficking in any part of our operations or our supply chains.

BOWE's supply chain structure is currently simple. However, as we scale and grow this will become more complex.

Certain sectors, products and services and countries might carry higher risks of modern slavery than others. Managing this risk in certain cases is likely to be complex and difficult.

In those circumstances, it is critical to understand the risks and to develop a documented plan to mitigate and manage such risks over time.

Currently some of the highest-risk sectors are the following:

- IT services and software;
- Apparel, uniforms and merchandise;
- Trade Services and maintenance;
- Engineering and construction; and
- Security services.

## **6. Managing & Reporting Risks**

If modern slavery or human trafficking occurs within BOWE's business or supply chains, we might be subject to legal liabilities and incur significant reputational damage.

Persons who are directly involved in misconduct which comprises or involves modern slavery or human trafficking, or who choose to ignore the known or suspected misconduct of others in that regard, might also incur legal liability.

## **7. What to do if you identify an incident**

If a staff member becomes aware of a potential or actual incident relating to modern slavery and human trafficking, they must promptly notify the CEO of BOWE.

## **8. Investigating and Managing Incidents**

BOWE will promptly investigate reports or potential breaches of the Policy and will address breaches wherever and whenever they occur.

**BOWE**

