

Modern Slavery Policy

The Ayers Group (company) consist of:

Ayers Management Pty Ltd – ABN: 76 123 208 300

Ayers Payroll & Contractor Services Pty Ltd – ABN: 55 161 137 346

The Lester Partnership Pty Ltd – ABN: 31 076 127 323

1. PURPOSE

The Modern Slavery Policy ("Policy") applies to The Ayers Group list of companies ("Company"), our employees, contractors, subcontractors and suppliers. The purpose of our Modern Slavery Policy is to:

- (a)** Meet the Company's legal and regulatory obligations in the areas in which the Company operates.
- (b)** Conduct risk assessments to determine which parts of the business and its supply chains are most at risk from modern slavery so to prevent, mitigate and where appropriate, remedy modern slavery in its operations and supply chains.
- (c)** Source products and services in accordance with legal obligation and community expectations while working with suppliers to improve their social and environmental practices.
- (d)** Provide information for individuals to report breaches.

2. POLICY APPLICATION

This Policy applies to all persons working for or on behalf of, or providing services to, the Company, including all Suppliers, Employees, Directors, officers, Contractors, consultants and any other third-party representatives. The principles of this policy must be complied with or incorporated into policies within the Company (as applicable).

3. POLICY

The Company must ensure:

- (a)** All employment with the Company is voluntary.
- (b)** The Company does not use or condone child or forced labour in any of its operations or premises and works to ensure these practices are not present in its workforce or supply chain.
- (c)** The Company does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude.
- (d)** The Company abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- (e)** Where the Company is made aware of modern slavery practices in its own business or within its supply chain, the Company will investigate all claims and if valid will remediate in line with this Policy.
- (f)** The Company adopts policies and procedures to ensure that it is addressing modern slavery and ethical sourcing risks in its operations and supply chains in a way that is appropriate for the relevant business units.

(g) The Company must, as far as practicable, include in its operational and supplier contract terms, requirements that suppliers comply with all applicable laws and regulations in the areas in which they operate.

(h) The Company must, as far as practicable, use in its operational and supplier contract terms requirements that suppliers: i. comply with the Minimum Standards set out in Annexure A (Minimum Standards); ii. provide the Company with rights of termination if the supplier is unable or unwilling to work towards full compliance with the Minimum Standards.

(i) As far as practicable, suppliers must be: I. encouraged to exceed the Minimum Standards and promote best practice and continuous improvement; and ii. monitored for compliance with the Minimum Standards through supplier assessment processes as appropriate.

(j) The Company must monitor and review the effectiveness of the policies and procedures referred to in paragraph (a) above, taking into account their suitability, adequacy and effectiveness as per the risk assessment.

(k) The Company must implement an approach to modern slavery risk management in accordance with the guidelines in Annexure B.

4. REPORTING BREACHES

If you have reasonable grounds to suspect that a Company director, officer, employee, contractor, supplier, consultant or other person who has business dealings with the Company has engaged in practices considered Modern Slavery you may make a disclosure in accordance with the Company's Whistle-blower Policy and Procedures.

5. BREACH OF THE POLICY

Any breach of this Policy will be taken seriously and may result in counselling and/or disciplinary action, up to and including dismissal.

6. GENERAL It is a condition of employment by the Company that all employees must comply at all times with this Policy. However, this Policy does not form part of any employment contract between any person and the Company, nor does it constitute terms and conditions of any person's employment with the Company. This Policy will be made available on the Company website and the Company's Internal Communications Platform.

Annexure A

Minimum Standards expected of Suppliers Minimum Standards

No forced or bonded labour Employment shall be freely chosen. Suppliers shall:

(a) not use any type of forced labour (any work or service that is involuntary, and performed under threat of penalty), bonded labour (work for which the worker does not receive compensation, but repays a debt, which is often incurred by another person offering the worker's labour in exchange) or indentured labour (in which an employer forbids workers from leaving employment at the worker's discretion);

(b) respect the freedom of movement of their workers and not restrict their movement by withholding / controlling identification documents e.g. passports, holding money deposits or taking any other action to prevent workers from terminating their employment; and

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(c) ensure that workers are free to leave their work premises and/or their employer after reasonable notice.

No child labour - Suppliers shall comply with the minimum legal working age. 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.

Wages, benefits, and transparent record keeping - Suppliers must comply at a minimum with all laws regulating wages, overtime compensation and statutory employment benefits. Record keeping must be accurate and transparent. Workers must be provided with written and understandable information about their employment conditions before they enter employment and about their wages for each pay period. Deductions from wages for disciplinary measures or any deductions from wages not provided for by law shall not occur without the express permission of the worker concerned. All disciplinary measures should be recorded.

Working hours - Working hours must comply with applicable laws. Workers should not be required to work more than the maximum hours per week as stipulated by law. Any overtime shall be agreed, not be excessive, not be requested on a regular basis and shall be compensated as prescribed by applicable laws.

No discrimination - All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation. Suppliers must ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.

No harassment or abuse - Workers shall be treated with dignity and respect. In particular, suppliers will provide a workplace free from harassment or abuse, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.

Freedom of association, grievance - 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.

Mechanisms and recourse - Workers should have the right to join or form trade unions of their choosing. Suppliers should not interfere with, obstruct or prevent legitimate related activities, such as collective bargaining.

Workers are allowed to select worker representatives. Representatives should not be discriminated against and should have regular access to company management or appropriate process in order to address grievances and other issues. Suppliers must have a policy in place for workers to approach management on issues of concern, on their own or through worker representatives, confidentially.

Working conditions - Suppliers shall provide a safe and hygienic working environment that is without risk to health and safety, taking into consideration knowledge of the relevant industry and any specific hazards. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment shall be supplied, and workers are to be trained in their use. Where suppliers provide accommodation it shall be clean, safe and meet the basic needs of workers. Workers will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation. Workers have the right to refuse work that is unsafe.

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No bribery or corruption - Suppliers shall comply with applicable anti-corruption laws and regulations. Bribes, favours, benefits or other similar unlawful or improper payments, in cash or gifts, are strictly prohibited, whether given to obtain business or otherwise. Suppliers shall keep accurate records of all payments made and received in cash or gifts, for audit purposes.

Subcontracting - Where subcontracting is permitted, suppliers must have adequate processes in place for properly managing sub-contracting to ensure that sub- contractors operate in accordance with this and any applicable Company policy and is undertaken strictly in accordance with the contract. Migrant workers Migrant workers shall have the same entitlements as local workers as stipulated by law. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer. The employer must not require the worker to surrender identification documents. Workers employed through a third-party agent or contractors are the responsibility of the suppliers and are thus covered by these Minimum Standards.

Hiring and regular employment - Suppliers must provide each worker with a clear, understandable labour / employment contract containing all legally required employment terms, entitlements and conditions. In addition, where possible, suppliers should work towards providing permanent employment for workers and avoid labour-only contracting arrangements, consecutive short-term contracts, excessive piece-work or false apprenticeship schemes to avoid obligations of regular employment to workers.

Annexure B

Modern slavery risk management Minimum Standards

Accountability for modern slavery issues, with an identified risk owner - The Company acknowledges that it is accountable for addressing modern slavery issues in operations and supplier contracts, and will nominate a specified individual or role to be responsible for co-ordinating management of this risk.

Supply chain mapping and risk assessment - The Company must assess the risks of modern slavery across its operations. The risk assessment must initially address the modern slavery risks of tier 1 suppliers and then assess those suppliers beyond tier 1 who are determined by the Company to be high risk. On-boarding and contracting The Company must perform due diligence on new suppliers to determine their risk level and control procedures in relation to ethical sourcing and modern slavery as appropriate for its business. The Company must have a process in place to consider the supplier's ethical sourcing and modern slavery performance during the supplier on-boarding.

Audit and compliance program - The Company must assess suppliers through its audit/compliance program to confirm compliance with this policy. The Company should involve relevant personnel or external providers trained in conducting audits when required.

Training - The Company must ensure that team members with relevant roles in relation to the policy receive adequate training on the policy and any supporting processes applicable to their role. Complaints mechanism The Company must have an accessible and well-publicised reporting mechanism for concerns or disclosure in relation to modern slavery which allows for confidential and anonymous reporting and provides protection from reprisal. There must be clear processes for investigating and reporting on the issues raised through the reporting mechanism. Remediation The Company must be committed to working with suppliers to remediate any breaches of this policy. Stakeholder engagement The Company must have an approach to stakeholder engagement in place. Review The Company must monitor and annually review the effectiveness of the risk management measures described above.

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