

Modern Slavery Policy

February 2025

Context & Purpose

At Xenith we are guided by our Company Values & Expected Behaviours. These are the foundation of how we conduct ourselves and interact with each other, our clients, suppliers, shareholders, and other stakeholder.

Xenith (the Company) is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair trading, honesty and integrity in our business activities.

This policy has been put in place to ensure any concerns raised regarding any misconduct or improper state of affairs or circumstances in relation to the Company's business are dealt with effectively, securely, appropriately, and in accordance with the Corporations Act 2001 (Cth); the Taxation Administration Act 1953 (Cth) and any other relevant Commonwealth legislation that governs a Company's business (collectively referred to as 'the Act').

The Company encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent, or undesirable conduct involving the Company's business and provides protections and measures to individuals who make a disclosure in relation to such conduct without fear of victimisation or reprisal.

This policy will be provided to all employees and officers of the Company upon commencement of their employment or engagement and will also be available via Employment Hero.

The policy is also available to persons outside the organisation and can be accessed on the Company website.

Objective

Xenith Consulting conducts its business in compliance with the law, including all applicable modern slavery laws, initiatives and guidelines. It takes a zero-tolerance approach to modern slavery within its operations and supply chains.

Accordingly, the Company has adopted this policy to support human rights and circumvent modern slavery activities to the extent possible.

This policy is intended to outline the Company's commitment to identify, prevent, mitigate and account for modern slavery risks or practices, and further to set out clear standards of conduct regarding responsibilities and reporting.

It applies to all employees (existing and prospective) acting for or on behalf of the Company at all levels and includes permanent, fixed-term or temporary employees, directors, executives, officers, consultants, secondees, contractors and agents.

Policy

Guidelines & Scope

What is Modern Slavery?

Modern slavery is a term used to describe a range of serious exploitation practices. Practices that constitute modern slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour.

More generally, modern slavery may include circumstances where a person's freedom and ability to make choices has been significantly undermined or removed.

Types of Modern Slavery

Modern slavery can take many forms and some of them are often subtle and hard to identify. Below are some key types of modern slavery exploitation.

- Child labour is the exploitation of children through any form of work that deprives them of their childhood, their potential, and their dignity.
- Debt-bondage is work exchanged for a debt for no wages, or less than that required by law. Bonded labourers may be subjected to different forms of abuse, including long working hours, physical and psychological abuse, and violence.
- Deceptive recruiting for labour or services are situations where a person is deceived into entering an engagement to provide labour or services for minimal pay, or which they cannot leave because they have been manipulated into a debt.
- Forced labour is any compulsory labour that occurs, under threat of punishment. Almost all modern slavery practises contain some element of forced labour.
- Servitude occurs when the person does not consider themselves free to cease providing their labour or services.
- Slavery involves the exercise of power of ownership over a person, including the power to make them an object of purchase and use their labour in an unrestricted manner.

Who is most at risk of Modern Slavery?

Modern slavery is widespread across vulnerable groups of individuals, including for example:

- Temporary and migrant workers that may not have sufficient understanding of their work rights or labour protections, and are therefore at risk of exploitation, or
- Minority or socially excluded groups that feel unsupported and may accept being subjected to unlawful work practices.

Identifying risks of modern slavery

Awareness of modern slavery is instrumental in mitigating against the risks of its existence in our organisation and supply chains, through identification and reporting. Some common signs of modern slavery or exploitation can include:

- Excessively low prices and fast turnaround when compared with other suppliers.

Responsibilities

Xenith takes a zero-tolerance approach to all forms of modern slavery and is strongly committed to delivering accountability and transparency to all clients and stakeholders.

The Company also understands general obligations with respect to modern slavery and is committed to ensuring compliance with relevant legislative and regulatory requirements, including that it protects people who disclose such unlawful behaviour from victimisation.

Accordingly, in seeking to encourage ethical business practices and to prevent modern slavery activities to the extent possible, the following warranties are made:

- the Company will comply with all applicable laws, statutes and regulations in force from time to time which relate to modern slavery.
- the Company will take reasonable steps to ensure that there is no modern slavery in its operations and supply chains.
- the Company will implement and maintain due diligence procedures in seeking to circumvent modern slavery.
- the Company will uphold good records regarding all goods and services provided and received. This enables the Company to identify and address modern slavery risks and maintain responsible and transparent supply chains.
- the Company is committed to assessing its suppliers and monitoring their internal approaches to risk management around modern slavery and human trafficking in their own operations and supply chains.

Further, it is the responsibility of every person to help detect, prevent and report instances of modern slavery or concerns they may have in relation to modern slavery including by complying with this policy, and avoiding any activity that might lead to, or suggest, a breach of this policy.

How to raise a concern

To the maximum extent practicable, a person who genuinely discloses an allegation or concern about modern slavery in breach of this policy, a law or other standard of behaviour ("Whistleblower") will be protected from any adverse action for having raised such allegations or concerns, even where they prove to be unsubstantiated or incorrect. Except that, a person who maliciously or vexatiously makes a disclosure or false allegations may be subject to disciplinary action.

This protection also applies to employees who participate or assist in an investigation concerning modern slavery.

Reasonable grounds

Before making a disclosure, you must have reasonable grounds to suspect the relevant conduct has occurred or is happening.

Accordingly, all disclosures should provide specific, adequate and pertinent information with respect to, among other things, dates, places, persons, witnesses and the like, to enable a reasonable investigation to be conducted.

However, whistleblowing does not give you immunity from disciplinary or legal actions if found guilty of the same or similar misconduct.

Workplace Policy

For your own benefit, it is important that you do not 'blow the whistle' on any conduct before understanding your rights and obligations as a Whistleblower. You may not be protected by law if your allegation or concerns are not about reportable conduct that is protected.

Accordingly, you are encouraged to speak with an authorised Whistleblower Protection Officer, a senior manager, director or company secretary.

The Company recognises that maintaining appropriate confidentiality is crucial in ensuring that potential Whistleblowers make disclosures of modern slavery in an open and timely manner, and without fear of reprisal.

Accordingly, the Company will take all reasonable steps to protect the identity of the Whistleblower and will adhere to any statutory requirements in respect of the confidentiality of disclosures made. However, in appropriate cases, disclosure of the identity of the Whistleblower, or the allegation made by them, may be unavoidable.

Compliance

It is your responsibility to understand and comply with this policy. You will not be excused for any breach of this policy because you were instructed or influenced to act in a way that constitutes a breach of this policy. Ignorance will not be accepted as justification for a breach.

If there is an alleged breach of this policy, it may be investigated. If an investigation discloses that a breach is substantiated, disciplinary action may be taken, which may include a formal warning, suspension, reassignment or demotion, or termination of employment.

Reporting

The following procedures should be observed in circumstances of a breach or suspected breach of this policy. These steps are guidelines only and different processes or steps for dealing with complaints may be taken on a case by case basis.
Formally report the alleged breach to your supervisor, manager, human resource manager or a senior manager either by initiating a discussion or setting out the complaint in writing.

For this purpose, it is important that you keep a written record of the incident(s) including:

- day, date, time and location of the incident.
- names of the people involved, including witnesses.
- details of what happened.

Once a disclosure has been received, the Company will consider the most appropriate action. This might include an investigation of the alleged conduct, either by an appropriate person or a group of people, such as a committee.

Any investigation in relation to a disclosure will be conducted promptly and fairly, with due regard for the nature of the allegation and the rights of the persons involved in the investigation.

Any evidence gathered during an investigation, including any materials, documents or records, must be held by the investigator, and held securely.

During the investigation, the investigator will have access to all of the relevant materials, documents, and records. All involved persons must cooperate fully with the investigator.

Following the investigation, a final report will be issued, and appropriate action taken where applicable. If appropriate a disclosure may be referred to law enforcement agencies.

If the Whistleblower was involved in the conduct, which was the subject of the disclosure, the fact that the Whistleblower has made the disclosure may be taken into account in determining the severity of the disciplinary measures, if any, that may eventually be taken against such Whistleblower.

Questions

This policy does not cover every possible event or action. There will be circumstances where it is difficult to know what to do. In such cases you must exercise caution and common sense and comply with the underlying principles of this policy. If you have any questions or doubts about this policy please direct them to your supervisor, manager, human resources or a senior manager.

Support Available

Any employee who makes a disclosure under this policy or is implicated as a result of a disclosure that is made may access the Company's Employee Assistance Program (EAP) which is a free and confidential counselling service provided by EAP Assist.

Make an appointment - EAP Assist

Where appropriate, the Company may also appoint an independent support person from the Human Resources team to deal with any ongoing concerns you may have.

Other Matters

Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment.

In so far as this policy imposes any obligations on the Company, those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees, they are discretionary in nature and are also not intended to be contractual. The terms and conditions of employment that are intended to be contractual are set out in an employee's written employment contract.

Disclaimer

The Company reserves the right to amend or rescind this procedure at any time without notice.

Document Control

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