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Modern Slavery Policy



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1 PURPOSE AND APPLICATION

1.1 Purpose

The Quantem group of companies ("**Quantem**") is subject to the *Modern Slavery Act 2018* (Cth) and considers all forms of modern slavery unacceptable.

Quantem is committed to preventing modern slavery practices in our operations and projects within Australia and New Zealand and is committed to working with our customers and suppliers to identify and eliminate modern slavery within our supply chain.

1.2 Scope

This Policy applies to all Quantem directors, officers, employees, contractors and agents in Australia and New Zealand.

2 WHAT IS MODERN SLAVERY

The *Modern Slavery Act 2018* (Cth) defines modern slavery as including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour. Child labour is one of the worst forms of modern slavery and means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

Modern slavery has severe consequences for victims. It involves grave abuses of human rights and serious crimes.

Quantem does not condone any form of modern slavery in its business or supply chain.

3 MODERN SLAVERY REPORTING OBLIGATION

Quantem expects that anyone involved with our business will report known or suspected cases of modern slavery, violations of this Policy or other ethical standards.

Any actual or suspected breach of this Policy or of any applicable laws must be reported to the relevant Quantem Site Manager, Procurement Manager, Human Resources or the General Counsel and Company Secretary. You may also report any concerns under the Policy using the mechanisms in the Quantem Whistleblower Policy.

Retaliation against those who raise concerns is strictly prohibited.

4 APPROACH TO SUSPECTED AND ACTUAL MODERN SLAVERY

All reports of suspected or actual modern slavery must be referred to the General Counsel and Company Secretary.

Quantem will ensure any response to cases of suspected or actual modern slavery will prioritise protecting the rights of the person or persons suspected of being enslaved.

Where appropriate or required by law, Quantem shall report the actual or suspected modern slavery to the relevant authority.



If Quantem is notified or otherwise becomes aware of suspected or actual breach of modern slavery laws with a Quantem supplier, Quantem will work with that supplier to assist them in identifying and mitigating modern slavery risks in their business. Quantem reserves the right to terminate any supply contract for breaches of modern slavery laws.

5 COMMUNICATION AND TRAINING

Quantem will communicate this Policy to its employees, agents, contractors and suppliers. Quantem will also provide appropriate training on this Policy to its employees, including how to recognise modern slavery risks to ensure all actual or suspected instances of modern slavery are reported, investigated and appropriately dealt with.

6 ANNUAL REPORTING

Quantem will submit an annual statement setting out how modern slavery is assessed and addressed in its operations and supply chains. The statement requires Board approval and will be included in a public, online register administered by the Australian Department of Home Affairs.

7 CONSEQUENCES OF BREACHING THIS POLICY

Failure to comply with this Policy by Quantem employees, contractors or agents may result in disciplinary action which may include:

- counselling;
- verbal or written warnings; or
- termination of employment in the case of employees and termination of contract in the case of agents and contractors.

8 **REVIEW**

This Policy may be varied, amended, or replaced from time to time and will be subject to periodic review.

9 VERSION HISTORY

Version	Author	Date	Nature of Change
1.0	General Counsel and Company Secretary	12 November 2020	Initial issue
1.1	TA Manager	1 April 2024	Policy review and format update
1.2	CoSec	4 September 2024	Format change