

Modern Slavery Policy

Contents

Modern Slavery Policy 2

 Purpose 2

 Definitions 2

 Policy application 2

 Response to modern slavery..... 2

 Supply chain..... 3

 Non-compliance 3

Reporting modern slavery concerns 3

Remediation process 4

 1. Initial assessment 4

 2. Remedy 4

 3. Mitigate harm and continuous improvement 5

Policy review..... 5

Related and supporting policies 5

Document control information..... 6

Appendix A: Modern slavery examples..... 7

Modern Slavery Policy

Purpose

This Modern Slavery Policy outlines GBST's commitment to identifying, preventing, and addressing modern slavery risks within our global operations and supply chains. It aims to ensure that all business activities are conducted in a manner that is ethical, transparent, and respectful of human rights. The policy sets out our approach to recognising and responding to modern slavery concerns, including mechanisms for reporting, remediation, and ongoing improvement.

Definitions

- Associated Entities has the meaning given to that term by section 50AAA of the Corporations Act and includes any international entities.
- Contractors means all contractors, secondees and consultants of or to GBST (whether paid or unpaid).
- Director means a director of GBST Holdings Limited.
- Employee means an employee of GBST.
- GBST means GBST Holdings Limited ACN 010 488 874 and/or any of its Associated Entities.
- Modern Slavery is an umbrella term which covers a range of exploitative practices including debt bondage, human trafficking, sexual exploitation, forced labour, forced criminality, domestic servitude, child exploitation and forced organ removal.
- Policy means this document or any amendment or replacement document.
- Supplier means a person who supplies goods and services to GBST (whether paid or unpaid) and any employees of the Supplier.

Policy application

This Policy applies to all persons working for or on behalf of, or providing services to GBST in any capacity, including all Suppliers, Employees, Directors, officers, agency workers, Contractors, consultants and any other third-party representatives.

GBST expects that all who have, or seek, a relationship with GBST to familiarise themselves with this Policy and to act in a way that is consistent with its values.

GBST will only do business with Suppliers who fully comply with this Policy, or those who are taking verifiable steps towards compliance.

Response to modern slavery

- All employment with GBST is voluntary.
- GBST 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.
- GBST does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, unfair working conditions and pay, or involuntary servitude.

- GBST abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- Where GBST is made aware of modern slavery in its business or supply chain, GBST will investigate all claims and if valid, resolve the issue in line with the values expressed in this Policy.
- GBST offers training, at a minimum annually, to inform all Employees and Contractors about indicators of modern slavery, due diligence procedures for engaging Suppliers and the steps to take if there are concerns regarding modern slavery.
- GBST conducts risk assessments to determine which parts of the business and supply chains are most at risk from modern slavery to ensure focus on those areas.
- GBST provides safe and secure grievance channels for Employees and Contractors to raise concerns, see GBST's Whistleblower Policy for more detail.
- This Policy will be used to inform any statement on modern slavery that GBST is required to produce as a result of legislative requirements in GBST's operating locations.

Supply chain

- GBST expects its Suppliers to have similar values in relation to modern slavery, as published in GBST's [Supplier Code of Conduct](#).
- GBST engages with Suppliers to promote and support anti-slavery practices throughout the supply chain.
- GBST is committed to introducing anti-slavery obligations in all Supplier contracts. As part of contractual obligations, where appropriate, Suppliers will agree to undertake a process so GBST can gauge the Supplier's ongoing commitment to addressing modern slavery risks within its own business and those of its suppliers.

Non-compliance

- Any breach of this Policy will be taken seriously and dealt with on a case by case basis.
- A breach of this Policy by an Employee may lead to disciplinary action being taken in accordance with GBST's disciplinary process. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to GBST's disciplinary procedure.
- A breach of this Policy by a Supplier will also be dealt with on a case by case basis. Depending on the behaviour, GBST may choose to adopt a zero-tolerance stance towards the Supplier's behaviour and look at methods of preventing further engagement with the Supplier, or may decide to work with the Supplier so they become compliant with this Policy.

Reporting modern slavery concerns

- Any individual who suspects or is aware of modern slavery occurring in any parts of GBST's business or supply chain must report it to GBST's Head of People and Culture or General Counsel as soon as reasonably practicable.
- Reports can be made verbally or in writing. GBST will support any individual who, in good faith, raises genuine concerns or reports any actual or suspected modern slavery incidents.
- If an individual would prefer to report anonymously, they may report via GBST's Whistleblower hotline. Refer to GBST's Whistleblower Policy for detailed guidance on how to disclose or make a report.

Remediation process

The UN Guiding Principles (UNGPs) outline how organisations should address modern slavery concerns, depending on whether they have caused, contributed to, or are directly linked to the issue. This influences the selection of suitable remediation actions. Questions that should be considered include:

- Which human rights have been affected or what criminal offence has occurred?
- What is the business's relationship to the violation or offence?
- Is additional information required, and how will it be obtained (eg. from complainants or other stakeholders)?
- What should the business do in response to remedy any harm caused?

The subsequent process will be followed, however, as each modern slavery incident varies, the steps outlined may not apply in every situation.

With any remediation process, GBST will be guided by government frameworks in place (particularly in Australia and the United Kingdom).

1. Initial assessment

- GBST's Head of People and Culture and/or General Counsel will be responsible for promptly investigating a modern slavery incident, communicating and liaising with relevant stakeholders and the Board, as well as ensuring appropriate action is taken.
- Upon receiving a report of potential modern slavery, GBST will conduct an initial assessment to verify the report.
- This assessment will involve gathering relevant facts, consulting with appropriate internal stakeholders, and, where necessary, seeking advice from external experts.
- The aim is to ensure that all allegations are treated seriously and investigated promptly, while maintaining confidentiality.
- If immediate risks to individuals are identified, GBST will take every effort to ensure individuals are removed from immediate harm while the investigation proceeds.

2. Remedy

- If a modern slavery incident has been verified, then the remedy process will take place. Remediation will look different depending on the type of modern slavery incident.
- As a core principle, GBST will prioritise the safety and wellbeing of affected individuals, where it has direct control.
- Remedies may include:
 - Immediate removal from harmful conditions
 - Access to medical, psychological, legal, and social support services
 - Compensation or restitution where appropriate, such as facilitating the repayment of owed wages or fees
 - Financial assistance for transportation or repatriation costs
- If the incident occurs in the supply chain, GBST will require the supplier to implement corrective actions and demonstrate compliance with ethical standards. Continued engagement will be contingent on the supplier's response and remediation efforts.

- All incidents and remedial actions will be documented in writing and reported to GBST's Executive Team and Board. Where appropriate, disclosures will be made in GBST's annual Modern Slavery Statement.

Reporting to authorities

- In Australia, if a modern slavery allegation suggests a criminal offence (eg. human trafficking, forced labour), it should be reported to the Australian Federal Police (AFP) and not doing so may have legal implications. It may also be helpful to consult with non-governmental organisations (NGOs) for victim support. For example, the Salvation Army Australia provides independent assessment, support and referrals for victims of modern slavery and can liaise with the AFP.
- In the United Kingdom, suspected modern slavery should be reported to the Modern Slavery Helpline, [online referral](#) or police.
- For incidents overseas, involve NGOs for guidance and consider consulting the relevant consulate or embassy before contacting local authorities.

3. Mitigate harm and continuous improvement

- Steps to mitigate harm and prevent recurrence can include:
 - Developing a corrective action plan with clear timelines and priority actions.
 - If a corrective action plan is developed for a third party, agree reasonable timelines and monitor progress until completion.
 - Review the effectiveness of existing grievance procedures.
 - Assess current practices and systems to identify opportunities for improvement.
 - Apply insights from each incident to strengthen GBST's policies, training, and supplier due diligence processes.

Policy review

This policy is overseen by the Risk, Compliance and ESG Manager and approved by the Executive team. This policy will be reviewed at least annually, or sooner if material business and/or supply chain changes occur.

Related and supporting policies

- Employee Code of Conduct
- Supplier Code of Conduct
- Whistleblower Policy

Document control information

This is a controlled document. Details of the document ownership, distribution, status, and revision history are listed below. All comments or requests for changes to content should be addressed to the document owners.

Revision No.	Changes	Reviewer	Approver	Date
1.0	Initial release	Board of Directors	Board of Directors	24 May 2019
1.1	Update to new template, added reporting and remediation process, policy review, related policies, Appendix A	Risk, Compliance, ESG Manager	Executive team	November 2025

Appendix A: Modern slavery examples

Source: *Modern Slavery Response & Remedy Framework, Walk Free, 2022*

Modern slavery core principle	Examples of harm
No forced labour	<ul style="list-style-type: none"> • Employer physically restricts workers' movement. • Employer restricts movement by withholding identity or travel documents or threatening to turn workers into immigration authorities if they leave. • Employer perpetrates or threatens physical or sexual violence. • Employer coerces workers to complete work without pay by threatening to fire uncooperative workers. • Employer uses blackmail to coerce workers to work without pay. • Workers required to work excessive overtime, beyond legal limits.
No worker should pay for a job	<ul style="list-style-type: none"> • Workers have paid recruitment fees or other unreasonable costs associated with migration or employment. • Workers forced to work without pay or for minimal wages until they have "paid off" their debt (often recruitment fees they had to pay to get to the job). This debt may incur interest at excessive rates. • Workers threatened with violence to themselves or family or further financial penalty if they leave before paying their "debt" to employers/recruitment agents.
Workers should be treated and paid fairly for the work they do	<ul style="list-style-type: none"> • Employer or recruiter withholds workers' pay or assets or threatens financial penalties. • Workers are underpaid or are not paid in a timely manner. • Workers not paid for overtime or not provided other benefits to which they are entitled (leave, sick leave or other entitlements). • Workers promised types of work, working conditions, contract terms, housing or living conditions, job locations, employers or wages/earnings that do not materialise.

Preventing the worst forms of child labour	<ul style="list-style-type: none"> • A child under the age of 15 years or under the local legal minimum age for work or mandatory schooling is found to be working. • Note: if the child is aged between 13-15 years, some companies may permit them to complete light work as per the ILO Minimum Age Convention (C138).
Respect rights of workers to freedom of association	<ul style="list-style-type: none"> • Workers are prevented from forming or participating in trade unions. • Migrant workers are prohibited from joining local unions. • Union members and representatives are harassed or intimidated to withdrawing membership or stopping advocacy.
Workers should be able to raise grievances safely	<ul style="list-style-type: none"> • No effective grievance mechanism is available to workers. • Workers are intimidated or otherwise prevented from reporting their concerns. • A grievance mechanism exists, but certain workers are unable to access as it requires access to Wi-Fi or is not in their own language or culturally appropriate.