

## 1. Policy Statement

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PWR Holdings Limited and its wholly owned subsidiaries (together the Company or PWR) are committed to promoting ethical sourcing, respecting and promoting human rights, and active management of modern slavery risk across the Company's operations. This includes assessing modern slavery risks in our supply chain and taking swift action to address any adverse impacts.

We expect all suppliers and contractors who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in way that is consistent with PWR's DNA, as set out in our Code of Conduct.

We will only do business with organisations who fully comply with this policy, or those who are taking verifiable steps towards compliance.

We will uphold all laws relevant to modern slavery in all the jurisdictions in which we operate.

## 2. Scope

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This policy applies to all Employees of PWR and relevant Third Parties who deal with the Company and shall be communicated to them upon the adoption of the policy for existing suppliers and at the outset of a new supplier business relationship, and as appropriate thereafter.

This policy applies in all countries or territories where the Company operates. Where local customs, standards, laws or other local policies apply that are stricter than the provision of this policy, the stricter rules must be complied with. However, if this policy stipulates stricter rules than local customs, standards, laws or other local policies, the stricter provisions of this policy shall apply.

## 3. What do we mean by Modern Slavery?

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Modern slavery refers to situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Practices can include the following:

- **Human Trafficking** – Arranging or facilitating the travel of another person or harbouring that person with a view to their exploitation
- **Slavery** – Exercising powers of ownership over a person
- **Servitude** – The obligation to provide services is imposed using coercion, including where the victim is not free to leave their place of work
- **Forced Labour** – Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
- **Debt Bondage** – A person's services are pledged as security for a debt and (a) the debt is manifestly excessive; (b) the person's services are not applied to satisfy the debt; or (c) the length and nature of the services are not limited and defined
- **Forced Marriage** – Coercion, threats or deception are used to make a person marry or where the person does not understand the nature and effect of the marriage ceremony
- **Child Labour** – A child is exploited through modern slavery practices or is engaged in hazardous work which may harm their health, safety, or morals.

## 4. How does PWR seek to Embed the Ethical Sourcing and Modern Slavery Policy?

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The Company will continue to review and update our approach to embedding this policy, including but not limited to the following:

- Conduct risk assessments to determine which parts of our supply chains are most at risk from modern slavery, taking appropriate actions based on the level of identified risk
- Engage with high risk suppliers to understand their approach to addressing modern slavery risk and if no verifiable action is taken, trade with an alternative supplier
- Engage with new suppliers to understand their approach to managing modern slavery risk
- Ensure the Company's policies and procedures incorporate the requirements of this policy, including the standard terms of trade for purchasing

- Ensure employees responsible for purchasing are trained in how to identify and report modern slavery risks

## 5. Your Responsibilities

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The prevention, detection and reporting of any form of exploitation or risk of modern slavery are the responsibility of all Employees.

All Employees have the responsibility to read, understand and comply with this policy. You should always avoid any activity that exploits or contributes to the exploitation of workers.

Any Employee who breaches this policy will face disciplinary action, which could result in termination of employment.

This policy should be read in conjunction with the Company's Code of Conduct.

Employees are encouraged to raise concerns about any instance, or suspicion, of malpractice at the earliest possible stage through their line manager or other available reporting mechanisms including the Whistleblower Policy

## 6. Protection

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Employees who report or raise concerns about any instance, or suspicion that a worker is at risk of or being exploited, or reports in good faith under this policy will be protected from detrimental treatment/retaliation. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

## 7. Governance

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The CFO has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

## 8. Monitoring and Review

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The CFO will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be submitted to the Board for approval on a timely basis.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective. The CFO will report to the Audit and Risk Committee at least annually on the application of this policy.

## 9. Definitions

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**"Company"**: PWR Holdings Limited and all of its wholly owned subsidiaries

**"Employee"**: For the purposes of this policy this includes all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, or trainees, employed or engaged by us, or any of our subsidiaries, wherever they are located.

**"Third Party"**: Any individual or organisation you come into contact with during the course of your work for us. This includes actual and potential customers, suppliers, business contacts, Intermediaries, government and public bodies, including their advisors, representatives and officials, politicians and political parties.