

Title:

Ethical Sourcing and Modern Slavery**1. Purpose**

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

PWR expects all suppliers and contractors who have, or seek to have, a business relationship with PWR to familiarise themselves with this policy and to act in accordance with PWR's DNA, as set out in its Code of Conduct.

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

PWR will uphold all laws relevant to modern slavery in all the jurisdictions in which it operates.

2. Scope

This policy applies to all Employees of PWR and relevant Third Parties who deal with PWR. This policy shall be communicated to all Employees and Third Parties at the outset of a new supplier-business relationship, and as appropriate thereafter.

This policy applies in all countries, jurisdictions and territories in which PWR operates. Where local customs, standards, laws or other local policies apply that are stricter than the terms 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. Policy Statement

PWR will continue to review and update its approach to embedding this policy, including by:

- conducting risk assessments to determine which parts of PWR's supply chains are most at risk of facilitating or perpetuating modern slavery and taking appropriate actions based on the level of identified risk;
- engaging with high-risk suppliers to understand their approach to addressing modern slavery risk and, if no verifiable action is taken, ceasing trade with that supplier;
- engaging with new suppliers to understand their approach to managing modern slavery risk;
- ensuring that PWR's policies and procedures incorporate the requirements of this policy, including the standard terms of trade for purchasing; and
- ensuring that employees responsible for purchasing are trained in identifying and reporting modern slavery risks.

4. Responsibilities

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 and 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 PWR's Code of Conduct.

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

Employees who:

- a) report or raise concerns about any instance or suspicion that a worker is, or is at risk of, being exploited; or
- b) report in good faith under this policy,

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will be protected from detrimental treatment and retaliation. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

5. Compliance

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 that those reporting to them are made aware of, and understand, this policy and are given adequate and regular training on it.

6. Definitions

Modern slavery refers to situations in which coercion, threats or deception are used to exploit workers 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) 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 used to make a person marry or where the person does not understand the nature and effect of the marriage ceremony.
- **Child Labour** – The exploitation of children through any work that:
 - a) interferes with that child's ability to attend regular school; or
 - b) is mentally, physically, socially or morally harmful.

In this Policy:

- **CFO** means PWR's Chief Financial Officer;
- **Employee** 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 PWR's subsidiaries, wherever they are located; and
- **Third Party** means any individual or organisation with which an Employee comes into contact in the course of their employment. This includes actual and potential customers, suppliers, business contacts, intermediaries, politicians, political parties and government and public bodies, including their advisors, representatives and officials.

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