




Modern Slavery Policy

Babylon Pump & Power Limited

(ACN 009 436 908)

Adopted by the Board on 22 June 2023

Document Title:	BAB-HR-POL-005 Rev1 4.8 Modern Slavery Policy	Status:	Release	Page No:
Owner Responsible:		Date Last Updated:	22 June 2023	
Approved by:	Michael Shelby 	Revision Number	1	

Babylon Pump and Power Limited – Modern Slavery Policy

The purpose of this Modern Slavery Policy is to enable Babylon Pump and Power Limited (BPP) and its related entities to comply with local, national, international and other applicable regulations, in addition to addressing modern slavery risks within our supply chain and business operations.

This policy applies to all persons working for or on behalf of BPP, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representatives.

1 Definitions

Modern slavery means conduct which would constitute:

- (i) an offence under Division 270 or 271 of the Australian Criminal Code; or
- (ii) an offence under either of those Divisions if the conduct took place in Australia; or
- (iii) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- (iv) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Specifically, under the Modern Slavery Act 2018 (Cth) (MSA) modern slavery includes eight types of serious exploitation:

- (i) trafficking in persons
- (ii) slavery
- (iii) servitude
- (iv) forced marriage
- (v) forced labour
- (vi) debt bondage
- (vii) the worst forms of child labour and
- (viii) deceptive recruiting for labour or services

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.

Modern slavery does not include practices like substandard working conditions or underpayment of workers. However, these practices may also be unlawful and harmful and may be present in some situations of modern slavery.

2 Requirements

BPP is committed to its operational and supply chain not engaging in modern slavery practices by :

- (i) implementing processes and procedures to demonstrate it is addressing modern slavery risks in its operations and supply chains in a way that is appropriate.
- (ii) as far as practicable, including in its operational and supplier contract terms, requirements that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate.
- (iii) supplier documentation should include specific prohibition of modern slavery.
- (iv) subjecting new suppliers to a risk -based due diligence assessment prior to onboarding.

Operationally BPP and its suppliers shall :

- (i) prohibit the employment of employees who are under the international minimum age for work (15 years), or the national minimum age for work if it is higher;
- (ii) prohibit forced labour and human trafficking in the business and in those of employment agencies or sub-contractors used;
- (iii) respect the rights of workers to associate, organise and bargain collectively in a legal and peaceful manner;
- (iv) ensure that employee representatives are not discriminated against and have access to carry out their representative functions and provide a process for disciplinary and grievance mechanisms for all workers;
- (v) provide a safe and hygienic working environment; provide continuous monitoring to ensure compliance with applicable legislation and regulations;
- (vi) ensure that personal protective safety equipment is available and that workers are adequately trained in its use;
- (vii) ensure all working hours will comply with national laws and benchmark industry standards, whichever affords greater protection. Overtime work should be voluntary, and overtime should not be requested on a regular basis. Suppliers shall guarantee breaks and days off in compliance with applicable law; and
- (viii) provide wages and benefits that comply with all local laws and regulations or match prevailing industry rates. Overtime pay shall be calculated at the legally required rate, regardless of whether workers are compensated hourly or by piece rate

At all times to be guided and advised by appropriate independent organisations within the countries and regions that they operate on the required minimum standards applicable

3 Roles and Responsibilities

BPP's Board of Directors is responsible for review and approval of BPP's Modern Slavery Policy.

The Chief Financial Officer has primary and day-to-day responsibility for monitoring and performing due diligence on BPP's suppliers to ensure their compliance with their obligations.

All Company Personnel

- (i) must read, understand and comply with this Policy.
- (ii) are required to avoid any activity relating to BPP business operations or supply chain that might lead to, or suggest, a breach of the Policy. If a staff member does come across any instances of potential modern slavery, they must escalate their concerns as soon as possible.
- (iii) must notify their immediate manager or via the Whistleblower Policy process, as soon as practicable, should they suspect that a conflict with the Policy has occurred, or is likely to occur.

4 Escalation

Any actual or suspected breaches of the Policy or related documents should be promptly notified to the Managing Director. If any personnel believe appropriate action is not being taken, they may refer to the Whistleblower Policy.

5 RECORD KEEPING

Documents relevant to the Policy are to be retained for seven years to meet statutory requirements, however BPP recognises that there may be reasons for retaining some records longer than seven years, including specific legislative and/or operational requirements.

6 Reporting

Should any person have a concern about a possible breach of the Policy, they must directly report it to their immediate manager or the Managing Director or via the Whistleblower Policy.

If it is suspected that a vendor is in breach of this Policy, concerns should be raised with the relevant supplier, pursuant to the contractual dispute resolution provisions or 'agreed corrective action plans'.

Further escalation guidelines are detailed in BPP's Whistleblower Policy, available to employees on the BPP website.

A breach of this Policy may lead to disciplinary action being taken, up to and including termination of employment or engagement with the Company.