

MODERN SLAVERY POLICY

AVJennings' Position on Modern Slavery

This policy confirms our commitment to operating ethically and in compliance with the Modern Slavery Act 2018. Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom and includes practices such as servitude, human trafficking, forced labour and some forms of child labour. Slavery is a criminal offence in Australia.

Who this Policy Applies To

This policy applies to:

- All Directors of AVJennings;
- All employees of the AVJennings group, whether full time, part time or casual;
- All persons working for the AVJennings group under a contract or a consultancy agreement;
- All other suppliers of goods and services to the AVJennings Group.

What AVJennings Will Do About Modern Slavery

Governance

AVJennings is committed to high standards of corporate governance, so that our decisions and actions are based on transparency, integrity and responsibility to promote long term sustainability and the on-going success of our business. We strive to maintain a compliant and ethical culture within our business practices and have in place the following corporate policies that support our commitment to respecting and promoting human rights:

- Code of Conduct
- Appointment to Role Policy
- Equal Opportunity Policy
- Recruitment & Selection Policy
- Fraud and Corruption Prevention Policy
- Diversity Policy
- Disciplinary Policy
- Privacy Policy
- Whistleblowing Policy

Workplace

AVJennings is an equal opportunity employer and is committed to complying with relevant laws, community expectations and ethical standards in relation to human rights in respect of our employees and business. We treat people with dignity and respect, do not tolerate discrimination or harassment and are committed to creating and maintaining a diverse workforce and an inclusive environment for all. We are committed to ensuring our employment conditions meet all legal standards and have programs designed to protect and

support the health and wellbeing of our people. Our Code of Conduct sets out the standards of behaviour we expect of our business and people.

Relevant employees will be provided additional training to enhance their understanding of the causes and humanitarian impact of modern slavery, so that they will be able to identify and evaluate potential risks and deal with issues identified through avenues available to them.

Supply Chain

As part of its business operations, AVJennings engages contractors in the development and construction industries, which include civil and building contractors. It also utilises the services of product suppliers (eg. building materials, white goods, uniforms etc), services suppliers (lawyers, planning consultants, engineers, architects and others) as well as trade suppliers (bricklayers, plumbers, electricians, carpenters and other trades).

AVJennings acknowledges the potential for modern slavery to occur in its supply chains, particularly within complex supply chains that can extend beyond Australian borders.

AVJennings expects its suppliers to manage their business in an ethical manner, to ensure their employees and contractors are legally entitled to work and that they take necessary steps to ensure no modern slavery practices are present within their business. The Company will endeavour to introduce into its procurement practices specific requirements with respect to the prohibition of modern slavery practices.

AVJennings will endeavour to do business with organisations that have implemented policies and procedures to limit the risk of modern slavery occurring within their businesses and supply chains.

Where a risk of modern slavery is identified, AVJennings will work collaboratively with the supplier to implement changes and to educate them on the impacts of modern slavery.

Reporting Concerns

AVJennings' Whistleblowing arrangements provide an avenue for raising concerns either anonymously or otherwise. AVJennings treats all reports received seriously and they will be investigated in accordance with Whistleblower investigation procedures.