

# Modern Slavery (Anti-Slavery & Human Trafficking) Policy

Classification: Public

## Modern Slavery Policy Statement

New Era Technology and its subsidiaries (the “Company” or “New Era”) operate in a wide range of legal and business environments. The purpose of this Modern Slavery (Anti-Slavery and Human Trafficking Policy (the “Policy”) is to encourage and enable directors, officers and workers of the Company, including independent contractors in the United States and other countries as applicable to the extent they are covered by relevant local laws and legislation in relation to this Policy (for these purposes, each shall be referred to as an “Employee”), to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

Modern slavery is a crime and a violation of fundamental human rights. New Era Technology is committed to upholding the highest standards of ethical conduct and human rights across all our operations and supply chains.

This Policy is aligned with global legislation including the California Transparency in Supply Chains Act (2010), the UK Modern Slavery Act (2015), and the Australia Modern Slavery Act 2018 (Cth) as well as the SA8000 Standard, an internationally recognized framework for social accountability.

We recognize our responsibility, both as an organization and as individuals, to actively prevent and address all forms of modern slavery. We maintain a zero-tolerance approach to slavery, servitude, forced and compulsory labor, and human trafficking. Furthermore, we are committed to ensuring transparency in our business practices and in our efforts to combat modern slavery throughout our supply chains.

Accompanying modern slavery policies/statements are listed below:

- [Modern Slavery Statement](#) (UK)
- [Modern Slavery Statement](#) (Australia)

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## 1. Terms and Definitions

Term / Acronym	Definition / Meaning
<b>“Employee”</b>	Directors, officers and workers of the Company, including independent contractors in the United States and other countries as applicable to the extent they are covered by relevant local laws and legislation in relation to this Policy.
<b>“ESG Committee” or “Environmental, Social and Governance Committee”</b>	Includes, but is not limited to, representatives from Human Resources, Corporate Development and GRC (Governance, Risk and Compliance) teams.
<b>“modern slavery”</b>	Modern slavery refers to situations of exploitation in which a person cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power.
<b>“we”, “our”, “New Era”, “New Era Technology”, “us” or “Company”</b>	Refers to New Era Technology and its subsidiaries.

## 2. Scope

This Policy applies to all New Era Technology Employees, regardless of location (within or outside of the jurisdictions in which the Company operates).

We may have additional supplementary regional modern slavery policies / statements that could address legislation specific to that country and/or region.

This Policy does not form part of any Employee’s contract of employment, and New Era reserves the right to amend the Policy at any time.

## 3. Roles and Responsibilities

This Policy has been agreed upon and implemented following review and approvals from New Era Technology’s executive leadership team.

This Policy has been ratified by the New Era Board of Directors.

The Chief Administrative Officer (CAO) has overall responsibility for the effective operation of this Policy. The CAO has delegated responsibility for overseeing the implementation of the Policy to representatives from the Human Resources, Corporate Development and Governance, Risk & Compliance (GRC) teams (“ESG Committee”). Suggestions for changes to this Policy should be reported to [GRC@neweratech.com](mailto:GRC@neweratech.com).

Line managers have day-to-day responsibility for enforcing this Policy, and Employees should refer any initial questions about this Policy to line managers.

This Policy is reviewed annually by members of the ESG Committee. Changes may be made at any time as government guidance develops.

## 4. What is Modern Slavery

Modern Slavery is a crime and a violation of fundamental human rights. It is a term used to encompass slavery, servitude, forced compulsory labour, bonded and child labour and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The latest International Labour Organization (ilo.org) estimates show there are 50 million people worldwide in modern slavery. Modern slavery occurs in almost every country in the world, and cuts across ethnic, cultural and religious lines.

There is no typical victim of Modern Slavery, and some victims do not understand that they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of Modern Slavery or human trafficking:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- The person allows others to speak for them when spoken to directly.
- The person is regularly transported to and from their place of work at unusual hours.
- The person avoids eye contact, is withdrawn or appears frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside of their immediate environment.

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

## 5. Policy

Our Policy does not allow for any form of slavery or human trafficking, and we will take proactive steps to ensure that Modern Slavery is not taking place in any part of our business or supply chains.

New Era annually reviews and measures how we are performing. Our measurements include:

- Number of our Employees that have completed mandatory training.
- Number of suppliers have filled out our due diligence questionnaire.
- Number of complaints/grievances reported.

To ensure compliance with our Policy:

- We will not engage with organizations which facilitate any form of slavery including the use of child labor or forced labor, or which do not recognize freedom of association or collective bargaining.
- Working hours must comply with applicable laws and industry standards.
- We will pay our employees fairly and in compliance with all applicable laws.
- We require that the suppliers and third-parties we work with should hold their own suppliers and third-parties to the same standards.
- We seek to continually improve awareness of the practices necessary to combat slavery and human trafficking and assess the risk profile of our business in these areas.

Our zero-tolerance approach to Modern Slavery includes our commitment that:

- We will not allow any form of slavery or human trafficking to take place in any part of our business.
- We will not use child labor in any part of our business.
- We do not tolerate forced, bonded, or involuntary labor.
- All work must be voluntary, and workers are free to leave employment after reasonable notice.
- We recognize freedom of association by permitting our Employees to establish and join organizations of their own choosing without our permission; and we will recognize collective bargaining where required by local laws.
- No employee shall be discriminated against for exercising these rights.
- We provide a safe and healthy working environment, identifying and mitigating risks to prevent accidents and injury.
- We do not permit the use of corporal punishment, mental or physical coercion, or verbal abuse.
- Our disciplinary procedures are fair, transparent, and respectful.
- We will comply with all relevant laws, statutes and regulations relating to modern slavery.
- We will publish modern slavery statements in accordance with the relevant legislation.
- We require our suppliers and third-party providers to comply with the above; and to hold their own suppliers and third-parties to the same standards.
- We will seek to educate and raise awareness across our business in the identification and reporting of modern slavery.

## Suppliers

New Era expects our suppliers to share our commitment to act lawfully and ethically and to ensure that modern slavery is not taking place within their organization or their supply chain. At a minimum we expect our suppliers to:

- Complete due diligence questionnaires
- Comply with all applicable laws and regulations.
- Pay fair wages in line with legislation and awards for the industry and market.
- Provide a safe environment for their staff.
- Treat those who work for or on behalf of their business with respect, promoting an environment free from discrimination, harassment, and victimisation.
- Oppose Modern Slavery in all forms.
- Monitor supply chains on a continual basis and to promptly investigate any suspected non-compliance within its supply chain.

## 6. Raising a Concern; Suspected Breach of Policy

Employees should speak to their direct manager or the Human Resources department if/when they:

- Believe or suspect that a conflict with this Policy has occurred or may occur in the future.
- Have any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier.

The Employee may also file a complaint, in writing, in accordance with their local complaint/grievance procedures or where one does not exist, use the Complaint Procedure (Appendix A). If unsure which procedure to follow, ask your local Human Resources team.

## 7. Risk Assessment, Training, and Communication

New Era Technology is committed to ensuring that Modern Slavery is not taking place in any part of our business or supply chains and therefore will conduct periodic internal and external risk assessments and regular reviews of those assessments.

Modern Slavery awareness and training will be provided to Employees on induction and annually as necessary. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 8. Compliance, Monitoring and Enforcement

This Policy is intended for all New Era businesses, in all countries.

Employees must ensure that they read, understand and comply with this Policy.

New Era Technology seeks to proactively prevent and mitigate instances of non-compliance with this Policy.

New Era Technology's ESG committee is responsible for monitoring the effectiveness of this Policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this Policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to [GRC@neweratech.com](mailto:GRC@neweratech.com).

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control and we are all required to avoid any activity that might lead to, or suggest, a breach of this Policy.

New Era Employees who violate or breach this Policy are subject to disciplinary action, up to and including dismissal.

Suppliers or third-parties who violate this Policy may be subject to termination of all commercial relationships with New Era.

## 9. Acknowledgment

Those in receipt of this New Era Technology Policy acknowledge its receipt and understanding of its contents; and that New Era Technology expressly reserves the right to change, modify, or delete its provisions without notice.

## Appendix A: Complaint Procedure

If an Employee is subjected to, or if an Employee witnesses conduct the Employee believes to be unlawful or conduct that is believed to be in violation of this Policy, the Employee must report this conduct to the Employee's direct manager or Human Resources at the earliest opportunity. If the conduct involves the Employee's direct manager, or if the Employee believes it would be inappropriate to report the conduct to the direct manager, then the Employee must report this conduct to another member of the management team or Human Resources at the earliest opportunity. The complaint should be as detailed as possible, including all pertinent facts and circumstances, the names of all individuals involved, and the names of all witnesses.

No Employee shall be discharged or retaliated against in any manner because that Employee made a bona fide complaint in compliance with this Complaint Procedure or assisted in the investigation of a complaint.

Once a complaint is received, the Company will conduct an impartial investigation in compliance with the law. All Employees are required to cooperate in these investigations by, for example, providing all pertinent information to the Company. Although the facts gathered during the investigation and the Company's findings will be considered confidential, information will be shared on a need-to-know basis.

Any Employee who is found to have engaged in improper conduct shall be subject to disciplinary action, up to and including termination, depending on the circumstances.

If an Employee has made a complaint which has not been promptly handled, or if the results of the investigation or disposition of the complaint is not satisfactory, the Employee should report the basis for the dissatisfaction to the Employee's manager, another member of the management team or Human Resources at the first opportunity.

Employees must be truthful in reporting complaints and providing information during an investigation. An Employee who knowingly and intentionally makes a false complaint under this Policy or intentionally provides false information during an investigation of a complaint will be subject to discipline, up to and including termination.



## Document Information

Reference	ESG Framework
<b>Title</b>	Modern Slavery (Anti-Slavery and Human Trafficking) Policy
<b>Purpose</b>	The purpose of this Policy is to ensure New Era's compliance with obligations under the Modern Slavery legislation, reducing modern slavery risks posed to the business.
<b>Owner</b>	Chief Administrative Officer (CAO)
<b>Document Approvers</b>	ESG Committee
<b>Intended Audience</b>	New Era Technology permanent, temporary, and contracted staff and, in certain instances, independent contractors; New Era Suppliers and third parties.
<b>Review Plan</b>	Annually
<b>Document Classification</b>	Public

## Document History

VERSION CONTROL			
Revision	Date	Record of Changes	Released/Released By
<b>V1.0</b>	Jan 2024	Approved release	ESG Committee
<b>V2.0</b>	Sep 2024	Document owner/approvers updates	ESG Committee
<b>V3.0</b>	Nov 2025	Annual review; statement updates; owner/approvers updates	ESG Committee

## Control of Hardcopy Versions

The digital version of this document is the most recent version. It is the responsibility of the individual to ensure that any printed version is the most recent version. The printed version of this document is uncontrolled, and cannot be relied upon, except when formally issued by a member of the ESG Committee and provided with a document reference number and revision in the fields below:

<b>Document Ref.</b>	<b>Rev.</b>	<b>Uncontrolled Copy</b>	<b>X</b>	<b>Controlled Copy</b>
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## References

Standard / Framework / Other	Title	Description
<b>Corporate Policy</b>	Employee Handbook	Code of Ethics and Business Conduct: a set of rules that details New Era's values, ethics, and beliefs including the rules that govern legal compliance.
<b>Corporate Policy</b>	CSR Policy	The purpose of this policy is to communicate New Era Technology's commitment to taking responsibility for our actions and encourage a positive contribution towards improving standards for our clients and Employees, minimizing our impact on the environment and improving the quality of the local community.
<b>Corporate Policy</b>	Employee Handbook	Policies, in addition to the Code of Ethics and Business Conduct, including but not limited to Equal Employment Opportunity policy; Anti-Discrimination And Anti-Harassment Policy; "Whistleblower" Protection policy; Anti-Retaliation policy; Complaint Procedure; Open Door Policy; Standards of Conduct; Electronic Information and Communications policy; Confidential Information policy; Customer Relations policy.
<b>Corporate Policy</b>	Whistleblowing Policy	Ensures that an Employee can raise concerns about wrongdoing or misconduct within New Era without fear of victimization, subsequent discrimination, disadvantage or dismissal.
<a href="https://antislaverylaw.ac.uk/count-ries/">https://antislaverylaw.ac.uk/count-ries/</a>	Antislavery in Domestic Legislation	Database mapping all 193 UN Member States' domestic legislation against their international obligations related to modern slavery.
<a href="https://www.ethicaltrade.org/issues/modern-slavery/modern-slavery-and-transparency-standards#:~:text=UN%20Convention&amp;text=%E2%80%9CNo%20one%20shall%20be%20held,prohibited%20in%20all%20their%20forms.%E2%80%9D&amp;text=Provides%20the%20first%20internationally%20recognised,of%20means%20for%200certain%20purpose).">https://www.ethicaltrade.org/issues/modern-slavery/modern-slavery-and-transparency-standards#:~:text=UN%20Convention&amp;text=%E2%80%9CNo%20one%20shall%20be%20held,prohibited%20in%20all%20their%20forms.%E2%80%9D&amp;text=Provides%20the%20first%20internationally%20recognised,of%20means%20for%200certain%20purpose).</a>	Modern slavery and transparency standards	International agreements, standards and conventions on modern slavery
<a href="https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_855019/lang--en/index.htm">https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_855019/lang--en/index.htm</a>	Modern Slavery – Press Release (12 September 2022)	Press Release: 50 million people worldwide in modern slavery