

Document no.	ASHTP01
Issued:	20 / 06 / 2022
Replaces:	- / - / -
First issued:	12 / 08 / 2019

Anti-Slavery and Human Trafficking Policy

Policy

Spacetalk values human rights and are committed to ensuring that all business is conducted according to ethical, professional and legal standards and is committed to implementing and enforcing systems that ensure slavery and human trafficking is prevented.

Spacetalk will constantly uphold all laws relating to slavery and human trafficking in all the jurisdictions in which we operate. We are bound by the laws of Australia, including The Commonwealth Criminal Code Act 1995.

Purpose

This Anti-Slavery and Human Trafficking Policy exists to set out the responsibilities of Spacetalk and those who work for us in regard to observing and upholding our zero-tolerance position on slavery and human trafficking.

It also exists to act as a source of information and guidance for those working for Spacetalk. It helps them recognise and deal with slavery and human trafficking issues, as well as understand their responsibilities.

This policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third-parties), or any other of our subsidiaries or their employees, no matter where they be located in the world. The policy also applies to Officers, Board and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisors and government and public parties.

Any arrangement our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-slavery and human trafficking.

A breach of this Anti-Slavery and Human Trafficking policy and procedure may result in disciplinary action being taken.

Definition

Modern slavery is a crime and a violation of fundamental human rights. Its takes various forms, such as:

- slavery, servitude (coercing someone to provide services) and forced and compulsory labour;
- human trafficking (arranging or facilitating the travel or movement of an individual with a view to them being exploited);
- committing any offence with the intention to commit human trafficking;
- aiding, abetting, counselling or procuring any of the above offences;

All of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Policy

Spacetalk has a zero-tolerance approach to all forms of modern slavery and human trafficking within its business and its supply chain. Spacetalk is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in its own business or in any of its supply chains.

Spacetalk is committed to ensuring there is transparency in its own business and throughout its supply chains, consistent with its disclosure obligations.

Spacetalk is committed to providing safe and fair working conditions for all its employees and ensures that no child labour is employed, in line with minimum age laws, within the countries that it operates. We expect the same standards from all of our contractors, suppliers and other business partners and as part of its contracting processes, include specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children and we expect that our suppliers will hold their own suppliers to the same standards.

Spacetalk has diligently put measures in place that are designed to prevent and detect modern slavery and human trafficking within our business and supply chain, including the following elements:

- A policy which articulates our commitment to prevent violations of the Criminal Code within its operations and supply chain, being this Policy;
- Communication of this Policy and all relevant elements of the programme to all our employees and to our business partners and supply chain;
- The assessment of modern slavery and human trafficking risks within the Company and its supply chain and the development of effective, efficient and transparent controls to reduce exposure to those risks;
- The adoption of anti-slavery wording in contracts;
- The adoption of appropriate due diligence on business partners, agents, contractors, consultants, sub-contractors and suppliers coupled with a requirement and they implement procedures which incorporate the principles of the Criminal Code; and
- Training of all relevant individuals so that compliance with its policies and procedures is the duty of all relevant employees at all levels and so that individuals can recognise modern slavery practices and take steps to avoid the same.

Reporting

Internal reporting is critical to the Company's success, and it is both expected and valued.

If you suspect that there is have been any violations of the Policy or any illegal or unethical behaviour occurring in relation to Spacetalk, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered a breach of this policy, you should speak with your line Manager, the Risk and Compliance Advisor or the CEO.

Reports will be kept confidential and will be dealt with appropriately. You will not experience retribution or retaliation for a compliant made in "good faith". Spacetalk will familiarise all employees with its whistle blowing procedures so employees can vocalise their concerns swiftly and confidentially.

Responsibilities

As an employee of Spacetalk, you must ensure that you read, understand and comply with the information contained within this policy and with any training or other anti-slavery information you are given.

All employees and those under our control are equally responsible for the prevention, detection and reporting of slavery and human trafficking. They are required to avoid any activities that could lead to, or imply, a breach of this policy.

If you have reason to believe or suspect that an instance of slavery or human trafficking has occurred or will occur in the future, you must notify the Risk and Compliance Advisor.

If any employee breaches this policy by engaging in or conspiring to engage in any modern slavery conduct or human trafficking will face disciplinary action and could face dismissal for gross misconduct. In the most severe circumstances legal proceedings may be brought against you. Spacetalk has the right to terminate a contractual relationship with an employee if they breach this policy.

Training and Communication

Spacetalk will provide training on this policy as part the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy and will be asked annually to formally accept that they will comply with this policy.

Spacetalk's Anti-Slavery and Human Trafficking policy and zero-tolerance attitude will be clearly communicated to all supplier's, contractors, business partners and any third-parties at the outset of business relations and as appropriate thereafter.

Spacetalk will provide relevant anti-slavery and human trafficking training to employees etc where we feel their knowledge of how to comply with the applicable laws needs to be enhanced.

Monitoring and Reviewing

Spacetalk's Risk and Compliance Advisor 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.

Internal control systems and procedures designed to prevent slavery and human trafficking are subject to regular audits to ensure that they are effective in practice.

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 the Risk and Compliance Advisor.

This policy does not form part of an employee's contract of employment and Spacetalk may amend it at any time so to improve its effectiveness at combatting slavery and human trafficking.

Signature: _____ *Mark Fortunatow* _____ Date 20 / 06 / 2022
Chief Executive Officer