

Anti-Slavery Policy

ORCODA Limited and its subsidiaries (“The Company”) are committed to elimination of the risk of modern slavery occurring within its own business and limiting the risk of the infiltration of modern slavery into our supply chain or any other business relationship. This policy applies to all persons working for or on behalf of the Company including employees, directors, officers, contractors, or consultants. The company will only do business with organisations who fully comply with this policy.

Modern slavery can take multiple forms but, in this context, means the exploitation of people for commercial or personal gain and amounts to a violation of human rights. Examples may include:

- Child labour (that is exploitative or is likely hazardous to or interfere with a child’s education, health physical wellbeing or social development)
- Slavery – where ownership is exercised over an individual
- Forced and compulsory labour (not voluntarily performed, obtained from an individual under threat of force or penalty)

How we implement our Anti-Slavery Policy

- All workers engaged by The Company will be employed in compliance with the Fair Work Act 2009
- Where possible our suppliers will receive preference as:
 - local, regional
 - Australian
 - Tier 1 countries (governments fully comply with Trafficking Victims Protection Act TVPA)
- Our contractual documentation will incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour
- We reserve the right to terminate any contractual arrangement if there is a breach of this policy
- All employees will be trained in this policy during induction
- The Board of Directors has overall responsibility for this policy and in ensuring that the company complies with all its legal and ethical obligations

It is an expectation that everyone working within our business will:

- Fully co-operate with the implementation of this policy
- Report any possible breaches to management or the Board
- Participate in any investigations and action implementation