

## MODERN SLAVERY POLICY

Northrop Group (Northrop) is a multi-disciplinary consulting engineering practice, owned, governed, and managed by our people. Northrop acknowledges the importance of addressing and mitigating the risks associated with modern slavery within our operations and supply chain.

The term 'modern slavery' describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats and deception can be explicit or implicit. Modern Slavery is defined under the Australian Modern Slavery Act 2018 (the Act) as including eight types of serious exploitation:

- trafficking in persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; and
- the worst forms of child labour which means situations where children are subjected to slavery or similar practices or engaged in hazardous work.

This policy outlines our commitment to ensuring modern slavery and human trafficking in all its forms is prevented in our operations and supply chain. This policy applies to all employees, Directors, contractors, suppliers, or other representative of our business.

### Our stance against modern slavery

Northrop has a zero-tolerance approach to Modern Slavery. Northrop is committed to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in its own business operations or supply chains. Northrop is also committed to ensuring there is transparency in its approach to tackling Modern Slavery throughout its business and supply chains, consistent with the Business' disclosure obligations under the Act.

Northrop expects the same high standards from all its contractors, suppliers and other business partners. Northrop's 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 expect suppliers to hold their own suppliers to the same standards.

### Our risk assessment and due diligence

We assess the risk of modern slavery taking place in our business by identifying and managing any areas of concern within our business operations and any external suppliers. Risk factors include:

- sector and industry
- product and services
- geography
- entity governance structure
- indicators of modern slavery

Northrop is a professional services company operating in the Australian building and construction industry providing services as engineers, consultants, drafters and advisors. Our people are typically in full or part time permanent roles, and are protected by our internal policies and practices, meaning there is a low risk of modern slavery occurring within our direct business operations.

We recognise Northrop could be exposed to the risk of modern slavery and human trafficking through our supply chains including with our office product suppliers, maintenance workers and off-shore suppliers.

Approver  
Executive Leadership Team

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We are taking the following actions to manage that risk:

- Ensuring training is available to all Northrop employees so they are aware of the Modern Slavery Act and Northrop's policy on Modern Slavery;
- Regular assessment of our own supply chain risks;
- Maintaining a register of our suppliers, identifying those with potential risk factors;
- Starting an open dialogue with those suppliers who don't or may not be aware of the Act(s).
- Continually reviewing any changes to the Modern Slavery Act which may affect Northrop's legal obligations or necessitate any updates to this policy; and

We are committed to undertaking due diligence when contracting with external suppliers and identifying and assessing any indications of suppliers being high-risk. We will not work with high-risk suppliers unless we have conducted the appropriate assessment that our standards will not be compromised.

#### **Our commitment to training**

We are committed to training our people and relevant stakeholders to raise awareness about modern slavery risks, our policies and the role each individual plays in preventing and reporting any suspected cases.

Northrop will ensure all staff in procurement related roles are trained in understanding what modern slavery is, how to recognise it, how to report it, and the actions Northrop are taking to address modern slavery risks in our supply chain.

Northrop will also ensure all staff are aware of the Modern Slavery Act and Northrop's commitment to avoid all forms of Modern Slavery.

We will continue to identify and evaluate risks relating to human rights and commit to reviewing our policies, procedures, and training annually to help combat modern slavery.

#### **Reporting**

The prevention, detection and reporting of Modern Slavery in any part of Northrop' business and supply chains is the responsibility of all those working for it or under its direction. Employees, including contractors, are encouraged to raise concerns with their manager or People & Culture about any likely Modern Slavery breaches in any parts of Northrop' supply chains or business, at the earliest possible stage. Northrop will ensure confidentiality for any who report and will investigate all potential breaches.


#### **Review**

Northrop's People & Culture team carries out annual reviews on remuneration, terms and conditions, and applicable policies to ensure Northrop is meeting its own standards in ensuring modern slavery is not present in the workplace.

Management review this policy annually, alongside Northrop's Modern Slavery statement to reflect changes in legislation, best practices, and Northrop's experiences. This policy is made available to all employees at their induction and on Nexus. The Modern Slavery Policy is available upon request to external parties.



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