

CrescoNet Modern Slavery Policy

July 2026

1. Purpose

CrescoNet does not tolerate any form of modern slavery. We are fully committed to preventing slavery and human trafficking in our operations and supply chain, and to acting ethically and with integrity in all our business dealings and relationships.

This Policy sets out the principles and requirements that govern that commitment: the standards we hold ourselves to as an employer, the standards we expect of our suppliers, how our people can recognise and report modern slavery, and how we assess and continuously improve our management of modern slavery risk.

Our approach is informed by the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the UN Universal Declaration of Human Rights.

2. Scope

This Policy applies to all CrescoNet directors, officers, employees, contractors and agents (collectively “employees”), regardless of their level, seniority or scope of authority, in all countries in which we operate. It applies to all categories of worker, including temporary, migrant, student, contract and directly employed workers, and workers engaged through recruiters or labour hire agencies.

This Policy should be read together with the **Code of Business Conduct and Ethics**, the **Supplier Code** and the **Employment Equity, Prevention of Discrimination, Harassment and Bullying Policy**. This Policy does not form part of an employee's employment contract with CrescoNet and is not binding on CrescoNet. To the extent that the Policy requires an employee to do or refrain from doing something, it constitutes a direction from CrescoNet with which an employee must comply.

3. What is modern slavery?

Modern slavery is an umbrella term for situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom. The World Economic Forum describes it as “a catch-all term to describe human trafficking, forced labour, debt bondage, sex trafficking, forced marriage and other slave-like exploitation”. Under the Modern Slavery Act 2018 (Cth), it includes:

- **Human trafficking** — recruiting, transporting, harbouring or receiving a person through threat, force, coercion, abduction or deception, for exploitation.
- **Slavery and servitude** — where a person is treated as property, or their freedom is significantly restricted, and they are not free to stop working or leave their place of work.
- **Forced labour** — work performed involuntarily and under menace of penalty, including bonded, indentured and involuntary prison labour.
- **Debt bondage** — where a person works to repay a debt on terms that are manifestly unfair, or that make the debt impossible to repay.
- **Deceptive recruiting** — deceiving a person about the nature or conditions of work, pay, accommodation or fees.

- **Forced marriage** — where a person marries without freely and fully consenting.
- **The worst forms of child labour** — as defined in ILO Convention No. 182: all slavery-like practices involving children (including sale and trafficking of children, debt bondage and forced labour, and forced recruitment for use in armed conflict); the use of children for prostitution or pornography; the use of children for illicit activities, including drug production and trafficking; and work which, by its nature or circumstances, is likely to harm the health, safety or morals of children.

4. Our commitments — employees

4.1 Freely chosen employment

All work at CrescoNet is voluntary. CrescoNet shall not use forced, bonded, indentured or involuntary labour, child labour or human trafficking in any form. Workers are free to terminate their employment upon giving reasonable notice in accordance with local law or any applicable collective agreement, and shall not be financially penalised for cancelling a work contract where such notice is given. CrescoNet shall not withhold, destroy, conceal, confiscate or deny workers access to their identity or immigration documents — such as government-issued identification, passports or work permits — unless the holding of such documents is required by law.

4.2 Child labour and young workers

CrescoNet shall not engage in child labour. In particular, CrescoNet shall not engage in the worst forms of child labour as defined by the International Labour Organization (section 3 above) and shall not employ children in any work that affects their capacity to complete compulsory schooling in their jurisdiction.

4.3 Ethical recruitment

CrescoNet shall conduct document checks — including proof of age documents — for all workers before they begin working, to confirm that they are entitled to work in accordance with legal standards and applicable CrescoNet policies. All workers, including workers hired through recruiters or agencies, shall be given detailed and accurate work agreements or similar work papers in a language understood by the worker and, where relocation is required, before the worker relocates. Neither CrescoNet nor any recruiter or agent acting on its behalf shall charge recruitment fees or related fees to workers or potential workers; any such fees discovered will be repaid to the worker. There shall be no deceptive recruiting practices.

4.4 Wages and working conditions

Wages shall not be below applicable host country legal requirements, including minimum wage, overtime and legally mandated benefits. Deductions from wages shall not be used as a disciplinary measure. Workers shall receive an understandable wage statement sufficient to verify that they have been accurately paid for work performed.

4.5 Freedom of association

CrescoNet shall allow workers to exercise their rights to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly, in conformance with local law, and equally respects the right of workers to refrain from such activities. Workers shall be able to raise concerns about working conditions with management without fear of reprisal, intimidation or harassment.

4.6 Humane treatment and non-discrimination

CrescoNet does not tolerate harsh or inhumane treatment, including physical or psychological abuse or coercion, or any form of unlawful discrimination or harassment. CrescoNet's equal employment opportunity commitments — including the prohibited grounds of discrimination — are set out in section 4.3 of the Code of Business Conduct and Ethics and, for Australia and New Zealand, the Employment Equity, Prevention of Discrimination, Harassment and Bullying Policy.

5. Recognising the signs of modern slavery

Everyone at CrescoNet must be alert to, and report, suspected modern slavery by anyone associated with our Company, including in our supply chain. Recognised signs that a vendor or workplace may be engaged in modern slavery practices include (among other signs):

- restricted movement of staff, including workers being picked up and dropped off in groups;
- staff appearing uneasy, unkempt or malnourished, or showing signs of physical or mental injury;
- a workplace also being used as accommodation;
- workers who do not hold their own identity documents, or whose wages are withheld or paid to a third party;
- workers who appear fearful, or reluctant to speak in the presence of a supervisor; and
- prices or labour costs that are unrealistically low for the goods or services being provided.

6. Our supply chain

- We expect the same high standards from all of our contractors, suppliers and other business partners, and expect them to hold their own suppliers to the same standards. Suppliers must meet the expectations of the Supplier Code, including its human rights and labour requirements, and must:
- complete a modern slavery assessment, in the form provided by CrescoNet (or an equivalent acceptable to CrescoNet), prior to onboarding and annually thereafter;
- promptly notify CrescoNet of any modern slavery risks or incidents identified; and
- cooperate with CrescoNet audits or inspections and remediate any issues identified.
- Where remediation is required, suppliers are given a reasonable, defined timeframe; failure to remediate may result in termination of the relationship. This process is managed under the Modern Slavery Continuous Improvement Program, owned by the SVP Supply Chain.

7. Reporting concerns

Any worker or agent who becomes aware of, or suspects, modern slavery in our operations or supply chain must report it immediately to their manager, human resources or the legal department, in accordance with the Code of Business Conduct and Ethics. Reports will be promptly investigated and treated confidentially to the extent reasonably possible. CrescoNet will not tolerate retaliation of any kind for reports or complaints made in good faith.

8. Training

Selected workers — including those in procurement, supply chain, people management and recruitment roles — must complete brief modern slavery awareness training annually, as set out in the Modern Slavery Awareness Training Program.

9. Governance and review

The SVP Supply Chain owns implementation of this Policy and the associated Continuous Improvement Program and reports annually to the executive team on its effectiveness. Outcomes inform the annual review of this Policy. Breaches of this Policy may result in disciplinary action, up to and including termination of employment or engagement.