

Modern Slavery Policy (v1.0)

VERSION HISTORY

Rev No.	Date	Revision Description	Approval
1.0	11 November 2019	Creation of new policy following the introduction of <i>Modern Slavery Act 2018</i> (Cth)	Chief Executive Officer, 6 December 2019

AUTHORISATIONS

Prepared by:	Legal Counsel	October 2019
Reviewed by:	Company Secretary/General Counsel	November 2019
Approved by:	Chief Executive Officer	6 December 2019
Next review due:	3 years	December 2022

CONTACT FOR ENQUIRIES (POLICY OWNER)

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1. Introduction

Aurora Energy has introduced this Policy to demonstrate its commitment to operating ethically and in compliance with the Modern Slavery Act.

2. Purpose

The purpose of this Policy is to:

- a) limit the risk of modern slavery occurring within Aurora Energy, its supply chain or in any other business relationship;
- b) demonstrate Aurora Energy’s commitment to only doing business with those who fully comply with the Modern Slavery Act; and
- c) ensure compliance with the Modern Slavery Act.

3. Scope

All employees and contractors are responsible for complying with this Policy.

4. Definitions

ALT	Aurora Energy Leadership Team
BARCC	Board Audit, Risk & Compliance Committee
Modern Slavery Act	<i>Modern Slavery Act 2018 (Cth)</i>

5. Policy

5.1. Policy Provisions and Principles

This Policy is designed to govern Aurora Energy’s compliance with the Modern Slavery Act. Aurora Energy will meet the requirements under the Modern Slavery Act in three ways:

- a) in the procurement of goods and services;
- b) through contract management and monitoring key suppliers; and
- c) preparation and submission of the annual compliance statement.

These areas are outlined in more detail below.

5.2. Conducting Procurement of Goods and Services

The procurement framework is the key mechanism whereby key suppliers are engaged by Aurora Energy. It is therefore important that the procurement framework provides for due diligence on these suppliers and their compliance with the Modern Slavery Act. Procuring goods and services should be conducted in a way as to ensure that Aurora Energy only sources goods and services from entities that comply with their obligations under the Modern Slavery Act.

The extent of the due diligence conducted in a procurement will depend on the types of goods or services being sourced. Examples of the due diligence that may be conducted include requesting:

- attestation that the supplier complies with the Modern Slavery Act;
- a copy of the supplier’s most recent modern slavery statement;

- details of structure and operations of their supply chain; and/or
- details of the actions taken by the supplier to manage and address modern slavery risks in their supply chain.

If a proposed contract is included as part of the procurement, consideration must be given to a provision ensuring compliance with the Modern Slavery Act (refer to Section 5.3).

5.3. Contract Management and Monitoring Key Suppliers

All key supplier contracts must contain provisions covering compliance with the Modern Slavery Act. The obligations in the clause should include:

- compliance with the Modern Slavery Act and its reporting requirements;
- a requirement to take reasonable steps to ensure that there is no modern slavery in its supply chains or any subcontractor's supply chains; and
- a requirement to notify Aurora Energy if the supplier becomes aware of any actual or suspected breach of the Modern Slavery Act.

Aurora Energy will work collaboratively with key suppliers to identify and manage modern slavery risks and develop commercial and actionable solutions. Aurora Energy will discontinue arrangements with suppliers where it is apparent that those suppliers have not taken reasonable steps to prevent or specifically prohibit modern slavery in their business operations.

Contract Owners, in conjunction with the Legal, Risk and Compliance Team are responsible for conducting audits annually on key suppliers to monitor compliance with obligations under the Modern Slavery Act. The annual statement submitted to the Department of Home Affairs requires reporting on the risks of modern slavery practices in the operations and supply chain of Aurora Energy to be identified; and for the reporting of actions taken by Aurora Energy to address these risks (including due diligence undertaken). The audits are undertaken with a view to satisfy these requirements in the annual statement. The Legal, Risk and Compliance Team will provide support and guidance to Contract Owners conducting the annual audits.

5.4. Statement Preparation, Endorsement and Approval

The Modern Slavery Act requires that an annual statement be prepared and approved for each financial year. The Lead Compliance Advisor will be responsible for the preparation of the statement. The annual statement will be approved by the Board (on the recommendation of BARCC) and signed by a member of the Board. The statement must be submitted to the Department of Home Affairs prior to December 31 each year.

6. Key Stakeholder Responsibilities

6.1. Board & BARCC

The Board is responsible for approving and signing the annual modern slavery statement on the recommendation of BARCC.

6.2. Chief Executive Officer

The CEO is responsible for approving this Policy in accordance with the Aurora Energy Policy Framework and ensuring adequate and robust policies and procedures are in place to ensure the Policy is effectively implemented.

6.3. Aurora Energy Leadership Team

Members of the ALT are responsible for the implementation of policy obligations throughout their respective areas of the business.

6.4. Legal, Risk and Compliance Team

The Legal, Risk and Compliance Team has overall responsibility for the implementation and management of this Policy and will:

- provide training to employees (particularly Contract Owners and those involved in sourcing goods and services) in relation to the obligations under this Policy and the Modern Slavery Act;
- ensure that all applicable contracts have clauses covering modern slavery;
- partner with Contract Owners to monitor key suppliers and their compliance with the Modern Slavery Act;
- oversee sourcing activity, ensuring that an assessment of suppliers is conducted (where appropriate) on their compliance with the Modern Slavery Act;
- provide advice in circumstances of a suspected breach of the Modern Slavery Act (or a supplier's suspected breach of the Modern Slavery Act) or of this Policy;
- prepare the modern slavery statement for approval.

6.5. Contract Owners

Contract Owners must monitor key suppliers regularly to ensure they maintain compliance with the Modern Slavery Act.

7. Non-compliance with this Policy

All non-compliances with this Policy will be recorded in accordance with the Compliance Policy.

Any non-compliances that are risk-rated as Severe or Major will be escalated to the Board or a relevant Board Committee through Aurora Energy's non-compliance reporting processes.

Non-compliances that are risk-rated as Moderate or Minor will be reported to the Chief Executive Officer.

Incidents of wilful non-compliance with this Policy are considered to be serious and will be dealt with in accordance with Aurora Energy's normal performance management process, which may include dismissal.

8. Related Policies

- Compliance Policy.
- Procurement and Probity Policy.
- Procurement Procedure.
- Contracts and Supplier Management Procedure.

9. Precedence

In the event of a conflict between policies, the following precedence will apply in this order to the extent of any inconsistency:

- Board approved Policy.
- CEO approved Policy.
- Business approved Procedure.
- Business approved Work Practice.

10. Policy Approval and Review

The CEO is responsible for approving this Policy at least every three years, or earlier if a significant change occurs that may impact the Policy.

11. Whistleblowing Statement

In extreme circumstances an individual may be concerned that a serious breach of this policy has occurred but considers that it would be personally damaging to pursue it through normal channels. In such circumstances the individual should refer to Aurora Energy's Public Interest Disclosure Policy for information about how to report such a concern and to whom.

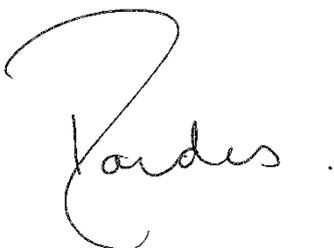
Aurora Energy's Public Interest Disclosure Policy ('whistleblower' policy) is based on the Public Interest Disclosures Act 2002. This Policy is available on both Aurora Energy's external website and its internal intranet.

Delegated Officers under the Public Interest Disclosure Policy will do all that is possible and practicable to ensure the identity of the individual and the identity of the person who is the subject of the disclosure are kept confidential.

12. Publication

This Policy is approved for publication on Aurora Energy's website.

Approved by the Chief Executive Officer on 6 December 2019



Chief Executive Officer