Modern Slavery Policy *(POL-003)*

Purpose

This policy sets out the actions PetraClean takes to identify, assess and reduce the risk of modern slavery within our operations and supply chains, in line with the Modern Slavery Act 2018 (Cth).

Its purpose is to ensure PetraClean:

- complies with all relevant laws and regulations
- sources goods and services responsibly and in line with community expectations
- takes active steps to prevent, mitigate and, where needed, remedy modern slavery risks in our business and supply chains

This policy is endorsed by PetraClean's Director, who holds overall responsibility for its implementation.

What is Modern Slavery?

Modern slavery refers to serious forms of exploitation where coercion, threats or deception are used to undermine a person's freedom. It includes slavery, servitude, forced labour, trafficking in persons, deceptive recruiting, debt bondage, forced marriage, and certain forms of child labour.

PetraClean recognises that modern slavery can occur in any industry or country. We are committed to rejecting all forms of exploitation and promoting ethical, transparent and fair business practices across our operations and supply chains.

Scope

This Policy applies to all PetraClean directors, managers, employees, and contractors wherever they are located (collectively referred to as "staff").

Ethical Standards

PetraClean is committed to ensuring:

- employment is freely chosen
- child labour is not used
- a fair and lawful wage is paid
- excessive or unreasonable working hours are not required
- discrimination is not tolerated
- workers can freely associate and bargain collectively in accordance with the law

Procurement activities must reflect integrity, fairness and transparency. Staff responsible for procurement must:

- deal fairly and consistently with suppliers;
- treat suppliers fairly and consistently
- keep all confidential and commercial information secure
- assess supplier integrity, industry risk and potential labour concerns
- keep clear, accurate records of procurement decisions

Supplier Review Frequency and Risk Evaluation

PetraClean regularly reviews suppliers to ensure ongoing compliance with ethical standards and the Modern Slavery Act 2018 (Cth).

The Modern Slavery Supplier Questionnaire will be issued to key suppliers every 12 to 24 months, depending on risk. The review considers:

- Nature of the goods or services provided (for example, labour-intensive or high-risk sectors such as cleaning, construction, textiles, or imported goods).
- the scale and importance of the supplier relationship
- geographical or supply-chain risk, including subcontracting or offshore operations
- significant changes in ownership, operations or sourcing

High-risk or strategic suppliers will be reviewed annually, while moderate-risk suppliers will be reviewed every two years unless their risk profile changes.

Low-risk or one-off suppliers may be subject to simplified monitoring rather than formal review. All suppliers must advise PetraClean of any major operational or sourcing changes that may affect their modern slavery risk.

Working with Suppliers

PetraClean's approach to Modern Slavery must be communicated to all suppliers at the start of our business relationship.

- Suppliers must complete PetraClean's Modern Slavery Questionnaire so risks can be assessed.
- Where risks are identified, PetraClean will work with suppliers to improve practices, but may end agreements if serious or unresolved issues remain.
- Suppliers are encouraged to adopt their own policies addressing modern slavery and ethical conduct.

Risk Assessment & Actions

PetraClean identifies and manages modern slavery risks by considering:

- the industry sector
- the geographical location of suppliers
- the nature of products or services provided

Higher-risk suppliers will be reviewed more frequently. Supplier contracts and agreements will also be reviewed to ensure they align with this policy.

Reporting & Protections

Anyone who becomes aware of potential modern slavery risks must report this to the Director or HR Manager.

If this is not possible, concerns may be raised under PetraClean's Whistleblower Protection Policy or reported directly to the Australian Border Force anonymous hotline.

PetraClean will protect individuals who report concerns in good faith from retaliation or disadvantage.

Training & Communication

- Staff who are most likely to encounter modern slavery risks will receive targeted training.
- All staff will be informed about this policy in plain language.
- Guidance or support may be provided to suppliers where appropriate.

Responsibilities & Governance

- The Director and HR Manager are responsible for implementing and monitoring this policy.
- PetraClean's leadership will review modern slavery risks and actions annually.
- All staff must follow this policy and seek guidance when needed.

Responsibility and Review

PetraClean's management (Managing Director and Human Resources Manager) is responsible for implementing and maintaining Company Policies. All staff are required to understand and comply with this Policy and seek clarification if required.

This policy was created in August 2022 and will be reviewed and updated as required, or 12 months from the last publication date to ensure that it remains current and relevant to PetraClean's standards of practice and relevant laws and regulations.

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