

1. Purpose

Aurora Labs Ltd (“Aurora” or “the Company”) is committed to ensuring that modern slavery, forced labour, human trafficking, and child labour have no place within its operations or supply chains. This policy establishes Aurora's framework to prevent, identify, and address risks of modern slavery in compliance with applicable Australian, international legislation.

2. Scope

This policy applies to:

- All Aurora employees, directors, and officers
- Contractors, consultants, and temporary staff
- Suppliers, distributors, and business partners

3. Legal and Regulatory Framework

Aurora operates primarily in Australia and complies with:

- Australia: Modern Slavery Act 2018 (Cth)

Where Aurora operates internationally or engages suppliers in other jurisdictions, it adheres to the strictest applicable standards.

4. Policy Statement

Aurora Labs and its Subsidiaries adopts a zero-tolerance approach to modern slavery and commits to:

- Acting ethically and with integrity in all business dealings
- Implementing systems and controls to mitigate modern slavery risks
- Ensuring transparency in supply chains

5. Risk Management

Aurora will:

- Conduct risk assessments across operations and supply chains
- Prioritise high-risk jurisdictions, industries, and suppliers
- Implement due diligence procedures prior to onboarding suppliers

6. Due Diligence and Supplier Requirements

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Aurora manages supplier conduct through its Quality Management System (QMS), specifically the controls governing externally provided processes, products, and services.

Suppliers are selected, evaluated, and monitored based on risk, performance, and compliance with Aurora requirements, including statutory and ethical obligations. This includes:

- Supplier onboarding and risk-based evaluation
- Ongoing performance monitoring (including quality and delivery metrics)
- Periodic review and re-evaluation based on risk profile

Aurora applies midweight audit and verification controls proportionate to supplier risk, which may include:

- Review of supplier certifications, declarations, and documented labour practices
- Verification of traceability and supporting documentation (e.g. Certificates of Conformance)
- Targeted supplier audits or requests for additional evidence where elevated risk is identified
- Use of corrective action processes (e.g. CAR/NCR) where non-conformance is identified

Where a supplier is assessed as high risk, Aurora may implement enhanced controls, including formal risk assessment (e.g. FMEA), restrictions on scope of supply, or increased monitoring frequency.

These controls align with Aurora's AS9100-compliant supplier management framework, which emphasises risk-based thinking, traceability, and corrective action management.

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Aurora reserves the right to suspend or terminate relationships with suppliers that fail to meet these requirements.

7. Reporting and Whistleblowing

Employees and stakeholders are encouraged to report concerns regarding anti-slavery issues through internal reporting channels. Aurora ensures:

- Confidentiality
- Protection against retaliation

8. Training and Awareness

Employees and stakeholders are encouraged to report concerns through internal reporting channels. Aurora ensures:

- Confidentiality
- Protection against retaliation

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9. Training and Awareness

Aurora will provide training for relevant personnel to ensure understanding of:

- Modern slavery risks
- Reporting mechanisms
- Compliance obligations

10. Governance and Review

This policy is owned by the Chief Operating Officer (COO), who is responsible for oversight, implementation, and effectiveness.

Aurora recognises that, as an Australian entity with fewer than 50 full-time equivalent (FTE) employees, it is not currently subject to mandatory annual modern slavery reporting under the Modern Slavery Act 2018 (Cth) in Australia. Notwithstanding this, Aurora adopts a proactive governance approach and will:

- Conduct an internal review of modern slavery and human trafficking risks annually
- Report findings to senior management as part of the Management Review process under the QMS
- Update this policy and associated controls where risks, incidents, or regulatory expectations change

This approach aligns with Aurora's broader Quality Management System, which emphasises risk-based thinking, continuous improvement, and management oversight.

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