

## 1. Purpose

Aurora Labs Ltd ("Aurora" or "the Company") is committed to ensuring that human trafficking is preventing in all aspects of its business operations and supply chains.

## 2. Scope

This policy applies to:

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

## 3. Legal and Regulatory Framework

Aurora's approach to preventing human trafficking is grounded in the following legal framework:

### 4.1 Australia (Primary Jurisdiction)

Aurora complies with the Criminal Code Act 1995 (Cth), which criminalises:

- Human trafficking
- Slavery and slavery-like practices
- Forced labour and debt bondage
- Deceptive recruiting practices

These offences carry significant criminal penalties and form the primary legal basis for Aurora's obligations in Australia.

Aurora also aligns with the Modern Slavery Act 2018 (Cth) as a governance framework. While Aurora may not meet the mandatory reporting threshold, it adopts the principles of risk identification, mitigation, and transparency.

Supporting legislation includes:

- Fair Work Act 2009 (Cth) (labour protections and workplace standards)
- Migration Act 1958 (Cth) (protections relating to migrant worker exploitation)

## 4. Policy Statement

Aurora Labs and its Subsidiaries strictly prohibits:

- The recruitment, transportation, transfer, harbouring, or receipt of persons through coercion, deception, or abuse of power
- Any form of exploitation, including forced labour, debt bondage, or servitude

Document Title	Document Status	Version	Effective Date
Anti-Slavery Policy	Released	1.0	[2026-02-23]

A3D-OPR-POL-0079

Aurora adopts a zero-tolerance approach to human trafficking and is committed to acting ethically, transparently, and in accordance with all applicable laws.

## 5. Risk Management

Aurora will:

- Implement due diligence procedures prior to onboarding suppliers
- Monitor high-risk regions and suppliers
- Implement enhanced due diligence where risks are identified
- Require contractual commitments from suppliers

## 6. Supplier and Partner Requirements

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 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.

All suppliers must:

- Comply with applicable anti-slavery and human trafficking laws
- Maintain ethical labour practices consistent with Australian standards

Document Title	Document Status	Version	Effective Date
Anti-Slavery Policy	Released	1.0	[2026-02-23]

A3D-OPR-POL-0079

- Provide transparency regarding workforce conditions where reasonably requested
- Cooperate with Aurora verification activities, including provision of documentation and participation in risk-based audits

Supplier obligations are flowed down through Purchase Orders and contractual terms in accordance with Aurora's QMS-controlled procurement processes.

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

## 7. Incident Response

Where human trafficking risks or incidents are identified, Aurora will:

- Investigate promptly
- Engage appropriate authorities where required
- Take corrective action, including termination of contracts

## 8. Training and Awareness

Targeted training will be provided to employees involved in procurement, operations, and supply chain management. Employees and stakeholders are encouraged to report concerns through internal reporting channels. Aurora ensures:

- Confidentiality
- Protection against retaliation

## 9. Governance and Review

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

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.

Document Title	Document Status	Version	Effective Date
Anti-Slavery Policy	Released	1.0	[2026-02-23]

<b>Document Title</b>	<b>Document Status</b>	<b>Version</b>	<b>Effective Date</b>
Anti-Slavery Policy	Released	1.0	[2026-02-23]