

**NOJA POWER<sup>®</sup>**

NOJA Power

# **Modern Slavery and Human Trafficking Statement**

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# NOJA Power Modern Slavery and Human Trafficking Statement

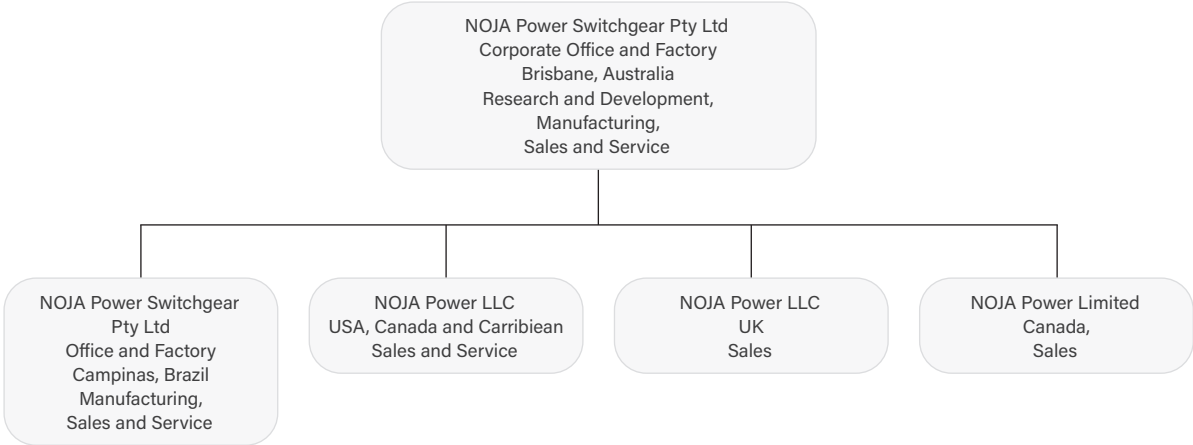
This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) (**Modern Slavery Laws**). It describes the steps taken by NOJA Power Switchgear Pty Ltd (ACN 099 412 807) and each its subsidiaries and consolidated entities (**NOJA Power**® or the **Company**) to minimise modern slavery and human trafficking risks within its supply chain and in the operations of its business during the financial year ending 30 June 2021.

## 1. About us

NOJA Power was established in 2002 as a research, development, and manufacturing company of electrical switchgear. The Company currently has manufacturing facilities in Brisbane, Australia, and Campinas, Brazil, and specialises in the manufacture of low and medium voltage switchgear assemblies and recloser products for industry, infrastructure, and electricity distribution utilities. The Company also has sales offices located in the USA, Canada, and the UK.

NOJA Power is a world leading manufacturer of pole mounted reclosers (OSM range): medium voltage circuit breaker with pole mounted controller supporting protection, remote communication capability, data logging and other functionality. There are a number of models of the reclosers based on voltage class, number of phases and other build options. In conjunction with different models of the controllers, different configuration and functionality is available for the vast number of applications with the main goal to improve the reliability, performance and functionality of medium voltage distribution network.

Utilising the technology solution from the OSM range, a number of other products are being developed including the GMK range which focuses on the solving the problems of connecting renewable energy sources and energy storage to the grid.



Today NOJA Power has about 300 people employed in the above-mentioned locations. All personnel of NOJA Power are responsible for observing the Modern Slavery Policy and must report any suspected violations of this Policy or any illegal or unethical behaviour. Complaints will be kept confidential and will be dealt with appropriately.

If a member of staff believes that a breach of this Policy has occurred or is likely to occur, they must notify their manager and/or the HR representative as soon as possible. If the staff member is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, it should be raised with their manager and/or the HR representative.

The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains.

## **2. Supply chain and third-party vendors**

Corporate office and factory (Brisbane, Australia) are responsible for the design, development and assembly of products. The parts, components and services are supplied to NOJA Power by approved suppliers. The validation of suppliers covers technical, commercial and other aspects including the check of compliance to the Modern Slavery Act or equivalent if supplier is not an Australian company and shall be added to the supplier selection requirements as stated in "NOJA-826 Supplier Selection and Evaluation Procedure".

NOJA Power consider the suppliers to be a critical part of the organisation and works closely to ensure that they conduct their business in an ethical way. This is ensured by reviewing their profile before selecting the organisation as the supplier of NOJA Power and auditing prior to the approval. Visiting the supplier's manufacturing facilities and conducting regular audits for the approved suppliers will be used to review their operational practices including the compliance to the Modern Slavery Act or equivalent for overseas suppliers.

NOJA Power is committed to operate with universal principles on labour, environment, human rights, and anti-corruption, and to take actions that advance these principles. We expect that all direct and indirect suppliers, all companies and individuals which supply goods, materials or services to us, to operate with these standards and principles or equivalent.

NOJA Power has a supply chain with approximately 200 direct suppliers from 10 countries. We have built long term relationship with our suppliers. Due to the complexity of the manufacturing products and parts, it requires close cooperation and understanding of the operations of our suppliers eliminating the possibility of rapid supplier changes by NOJA Power. We encourage our suppliers to be open and transparent and will continue to work with them to reduce the risk where it can be identified.

## **3. Commitment to Combatting Modern Slavery**

At NOJA Power, we are committed to conducting business in a responsible and ethical manner and are strongly opposed to any form of modern slavery, such as slavery, servitude, forced labour, human trafficking, or slavery-like practices.

We acknowledge our role in safeguarding human rights through ethical business practices and are committed to implementing and enforcing effective systems and controls to ensure that risks of modern slavery are minimised within our business and our supply chains.

Our approach to modern slavery is enshrined in our Modern Slavery Policy. This Policy underpins our commitment to limit the risk of modern slavery within our business and supply chains. The Policy also serves to ensure our compliance with applicable laws and regulations.

## **4. Potential Modern Slavery Risks**

We recognise the potential for modern slavery to occur within global supply chains, regardless of geograph-

ical location. Where we identify any actual or potential risks as part of our operations or supply chains, we acknowledge our responsibility to take steps to address those risks through our own activities and business relationships.

NOJA Power identified a number of key potential modern slavery risks and is engaging with suppliers to ensure that practices are in place to minimise these risks across the business. We are assessing these potential risks by undertaking a modern slavery risk assessment of our key suppliers. This risk assessment involved asking our suppliers to provide details of their approach to modern slavery, including any policies in place relating to modern slavery.

To this date, NOJA Power has not discovered any cases of modern slavery across our supply chain, either with our operations or suppliers. No form of modern slavery is knowingly used in NOJA Power business, by its suppliers, representatives, employees, contractors or subcontractors. However, NOJA Power recognises that identifying and addressing issues of modern slavery is an ongoing task as modern slavery can occur in every industry and sector.

Risk area	Risks	Expectations	Controls
Sector and industry	Use of unskilled, temporary, seasonal or child labour	Manufacturing of parts with high accuracy requires highly skilled and trained personnel which eliminates the use of unskilled, child or seasonal labour	<ul style="list-style-type: none"> <li>- NOJA-363 WHS Policy</li> <li>- NOJA-3350 Ethical Code of Conduct Policy</li> <li>- NOJA-30015 NOJA Power Whistleblower policy</li> <li>- NOJA Power Modern Slavery Policy</li> </ul>
Products and services	The product is made from materials or using services reported to involve a high risk of labour exploitation by international organisations.	The parts and product are manufactured from materials and components requiring use of high-level automation and similar technologies which eliminates the use of unskilled, child or seasonal labour	<ul style="list-style-type: none"> <li>- NOJA-826 Supplier selection and evaluation audit Procedure</li> <li>- NOJA-3128 NOJA Power supplier audit report template</li> <li>- NOJA Power Modern Slavery Policy</li> </ul>
Geographic	Higher risks of modern slavery due to the geographic location, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty	Suppliers are aware of modern slavery act and will follow the requirements to be compliant	<ul style="list-style-type: none"> <li>- Questionnaires to the suppliers</li> <li>- Visiting to the suppliers' site</li> </ul>
Entity	Entities that have previously reported as noncompliant with human rights or labour standards, including by media or NGO sources	Actions have been taken by the entities to comply with the requirements	<ul style="list-style-type: none"> <li>- Surveillance audit</li> </ul>

## 5. Consultation with other entities

As all our subsidiaries are majority owned by NOJA Power, we are constantly monitoring the use of contractors/service providers and expect all overseas entities to follow the local regulation and observe the policies regarding modern slavery, human trafficking and child labour.

NOJA Power is not aware of any service providers or other contractors to be in the position to use slave labour and consider the risk to be low but will continue to work with all entities to ensure due diligence of the contractors used.

## 6. Assessing Risk and the Effectiveness of NOJA's Actions

We understand the importance of reviewing the effectiveness of the actions we are taking to assess and address modern slavery risks. As noted above, NOJA Power has a Modern Slavery Policy in place and encourages openness and reporting of any breaches or potential breaches of the policy. In the event a supplier identifies any occurrence of, or a material risk of, modern slavery in their supply chain or operations, the supplier must notify NOJA and take practical and effective steps to address that occurrence or risk.

NOJA will undertake a modern slavery risk assessment on an annual basis, and in addition to ongoing reporting of potential or actual risks, will assess the effectiveness of actions it has taken in controlling or addressing modern slavery risks through this assessment process. We will continue to monitor the effectiveness of our actions and assess risk by:

- » reviewing any reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified;
- » engaging with stakeholders to maintain a proactive dialogue regarding modern slavery risks;
- » independently verifying due diligence questionnaires to confirm the accuracy of information provided by our key suppliers;
- » developing tools and policies to monitor high risk suppliers and associated risks; and
- » engaging directly with workers and other potentially affected groups in NOJA's operations and supply chains, as well as credible experts to assess risks.

NOJA aims to enhance its supplier engagement by:

- » improving supplier awareness of modern slavery risks and how they may contribute to modern slavery through awareness training;
- » taking steps to build supportive, transparent and collaborative relationships with suppliers including encouraging suppliers to be open with you about modern slavery risks;
- » ensuring workers in its supply chains have access to information about their rights, obligations and ways to access support; and
- » clearly communicating expectations to suppliers, including by ensuring the modern slavery issues are clearly and specifically addressed in supplier contracts, prequalification and other relevant mechanisms.

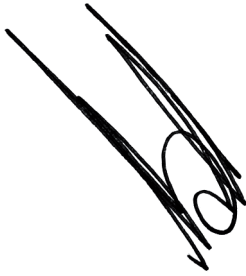
Our focus in 2021 was to review our existing processes and procedures. We also strengthened our understanding of the potential modern slavery risks and impacts related to our activities and further upstream in our supply chains. Our planned activities in 2022 include:

- » building expertise among our employees, especially those that rely on contractors, so that they can better identify and act on indications of modern slavery;

- » reviewing and updating (where necessary) our suite of procurement documents to further embed management of modern slavery aspects in our terms and conditions; and
- » exploring the implementation of key performance indicators to track our progress and effectiveness in relation to addressing modern slavery risks.

This statement has been approved by NOJA's Board of Directors by resolution passed on 17 December 2021.

Neil O'Sullivan

A handwritten signature in black ink, appearing to be 'Neil O'Sullivan', written in a cursive style.

Managing Director





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