

Modern Slavery Policy

Document Information

Item	Comments
Title	Modern Slavery Policy
Description	A modern slavery policy outlines an organisation's commitment to preventing and addressing modern slavery and human trafficking within its operations and supply chains. Modern slavery refers to situations where individuals are exploited and unable to leave due to threats, violence, coercion, deception, or abuse of power. This can include forced labour, debt bondage, human trafficking, and other forms of exploitation.

Version Control

Version	Sub-Policy Impacted	Author	Approver	Approval Date	Comments
1.0	Modern Slavery Statement	Jack Oliver	Karen Niehoff	15/10/2024	



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Modern Slavery Statement

Introduction

About COSOL

COSOL Limited (ABN: 66 635 371 363) is an ASX-Listed Australian company and is a leading provider of Asset Management Services.

Commitment

COSOL is committed to maintaining the highest ethical standards in all aspects of our operations. COSOL recognises the responsibility it holds in preventing modern slavery and human trafficking within our business and supply chains. COSOL is dedicated to ensuring that our practices, and those of our partners and suppliers, uphold the dignity and rights of all individuals.

Purpose:

This policy sets out COSOL's purpose in combatting modern slavery, applicable across COSOL's entire operations, including supply chains, employees, contractors, and other business partners. Through continuous risk assessment, robust policies, and proactive engagement with our stakeholders, we strive to eliminate any risks of modern slavery in our global operations.

Scope:

This Modern Slavery Statement applies to all entities within COSOL and covers the following stakeholder groups. Please see the definition of each stakeholder groups in the table below.

- Employees
- Supply Chain Service/Goods Providers
- Business Partners
- Clients
- Governance & Compliance
- Communities

Definitions:

Term	Definition
Business Partners	Joint venture partners & affiliates operating under the COSOL brand or with whom COSOL has a significant influence. External consultants, advisors, and freelancers engaged by COSOL for specific projects or services.
Communities	Local communities in regions where COSOL operate.
Customers and Clients	Public and private sector clients engaging with COSOL for the provision of goods or services, particularly where COSOL has influence over their supply chain practices.
Employees	Permanent Full-time, Permanent Part-time, COSOL employees unless specified otherwise.
Governance & Compliance	The Board of Directors and senior management responsible for the oversight of modern slavery risks within COSOL. Internal teams, including legal & human resources, tasked with implementing and monitoring adherence to this policy.
Supply Chain Goods/Service Providers:	All direct/indirect suppliers of goods/services to COSOL. Service providers engaged for operational support, including but not limited to logistics, cleaning, security, and facility management.
Sub-Contractors	Casual and Sub-Contracted resources performing work on behalf of COSOL.

Operations

Business Overview

COSOL provide asset management solutions for asset-intensive organisations that span across people, process, systems and data elements of the asset management framework. COSOL's clients span various industries, including Natural Resources, Energy & Water, Infrastructure, Government & Defence. COSOL is an equal-opportunity employer and is committed to supporting local communities through employment opportunities and company-wide initiatives. COSOL is an international business with offices in the Asia-Pacific region, and the Americas, and provides asset management solutions on a global scale. Our employees are based in both metropolitan and remote worksites.

Risk Assessment

Operational Risk

COSOL is confident that the risk of modern slavery within our operations is extremely low by ensuring our employment practices adhere to all regulations governed by the Fair Work Ombudsman. COSOL commits to providing a workplace free of bullying, harassment, and discrimination, and promotes diversity and equal opportunities. COSOL is committed to meeting the highest industry standards and has an open communication



policy where staff are encouraged to provide feedback or raise concerns directly to their manager or via anonymous surveys.

Supply Chain Risk

The primary products and services sourced by COSOL are IT equipment, office supplies, and computing services. COSOL's expected standard for suppliers includes:

- Suppliers must not use forced, bonded, or debt-bondage labour
- Child exploitation is prohibited
- Employees rights to freedom of association and collective bargaining are to be respected
- Fair wages and benefits are paid
- Work hours are not excessive
- Workplaces are safe and free from discrimination, harassment, and bullying; and
- Bribery and corruption will not be tolerated.

Policies and Procedures

Existing Policies

COSOL is committed to maintaining ethical practices across all aspects of our operations. We ensure our employment practices fully adhere to all regulations governed by the Fair Work Ombudsman, which includes providing fair wages, safe working conditions, and respecting workers' rights. Additionally, COSOL has established the following policy to further mitigate the risk of modern slavery:

- Code of Conduct

Due Diligence

Due to limited large-scale procurement requirements, COSOL does not have a formalised Procurement Due Diligence Procedure. The Finance Manager includes an evaluation of a supplier's modern slavery risks when setting up new suppliers in the COSOL Finance System. COSOL suppliers are assessed for their modern slavery risk, based upon the information provided by the supplier at the time of registration regarding their Modern Slavery Policy/Procedures and publicly available risk data. This includes information and/or statements provided publicly on supplier's websites and via searches of the Modern Slavery Statements Register. Should the Finance Manager deem a supplier to be a potential risk of Modern Slavery, they will bring the matter to the attention of the departmental manager requiring the purchase for further investigation, and/or to source alternative suppliers.

Review and Improvement

The COSOL Finance team will monitor the group's procurement needs and in conjunction our management of modern slavery risks. As the company grows, we will action any requirements of the Modern Slavery Act and formalise our Statement and processes accordingly. This statement will be reviewed annually under COSOL's Document Control processes.