![Nova Systems logo]

Modern Slavery Statement 2022

This joint statement covers the activities of Nova Aerospace Pty Ltd ABN 11 090 818 214 and its subsidiary Nova Systems Australia Pty Ltd ABN 39 613 308 008 to understand and implement actions to minimise the risk of modern slavery and human trafficking in our operations and supply chain.

Contents

1. Introduction

This joint statement is the third Modern Slavery Statement for Nova Aerospace Pty Ltd ABN 11 090 818 214 ('NAPL'), and the second Modern Slavery Statement for Nova Systems Australia Pty Ltd ABN 39 613 308 008 ('NSAPL') as a reporting entity (collectively, and inclusive of NAPL's subsidiaries where context permits, 'Nova Systems') for the purposes of the *Modern Slavery Act 2018* (Cth).

Nova Systems is proud to be a leading engineering services and technology solutions business with operations in Australia and overseas. Our talented people and strong workplace culture and values are integral to our success. We understand the importance of respecting and improving human rights as fundamental to how we deliver positive experiences for our clients, our employees and the broader community.

We have a robust policy suite in place that promotes ethical and legally compliant business conduct through governance, primarily driven by Nova Systems' Operational Framework and supported by integrated reporting mechanisms. Core policies under this Operational framework include Nova Systems' Code of Conduct, Whistleblower Policy and Compliance Policy. Our policy framework reflects our dedication to prevent Nova Systems' business practices contributing to violations of human rights such as modern forms of slavery. This is one aspect of Nova Systems' broad commitment to corporate social responsibility which covers key areas such as indigenous reconciliation, sustainability and the environment, diversity and inclusion.
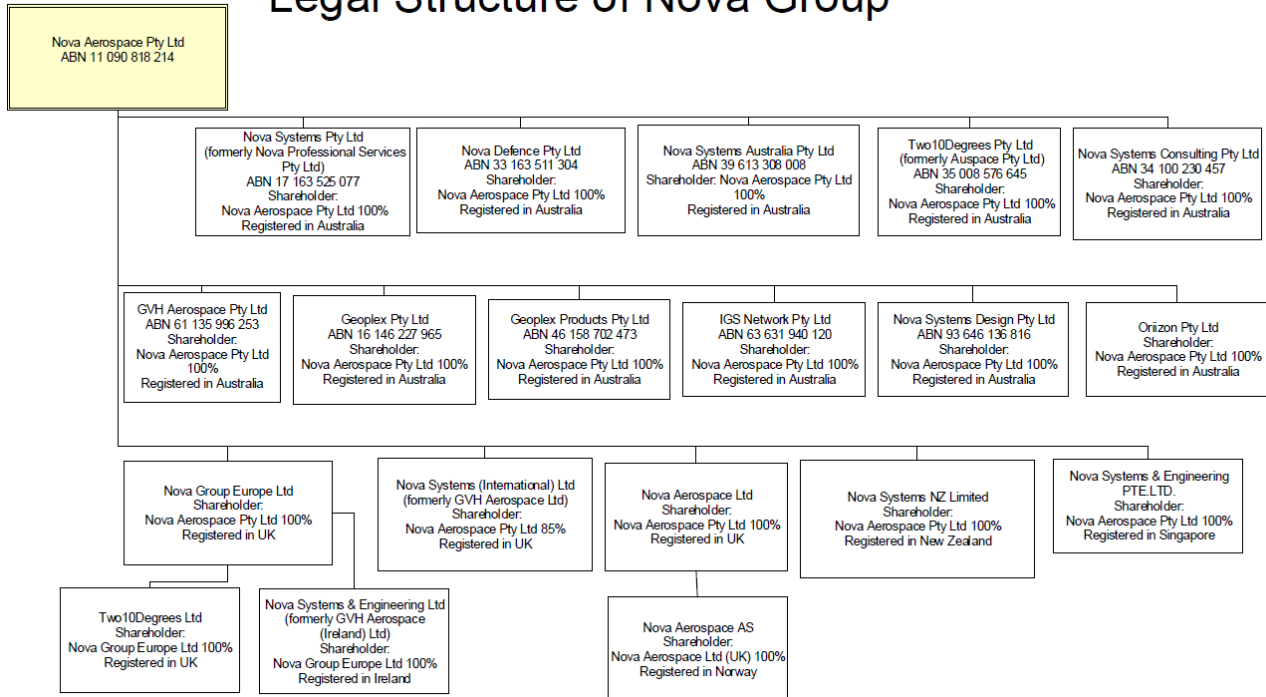
Nova Systems seeks to do business with suppliers that share similar values, ethics and sustainable business practices, including those related to human rights. Nova Systems recognises that as a responsible corporate citizen, its business conduct, and the performance of its suppliers, has a significant impact on the wellbeing of the communities in which it operates.

As NAPL wholly owns and controls NSAPL, and both reporting entities are governed by the same policies and processes, operate in the same sectors and share the same supply chains, this joint statement provides consolidated descriptions of both reporting entities' actions to address modern slavery risks.

2. Nova Systems' Structure, Operations and Supply Chains

Founded in 2000 in Adelaide, South Australia, NAPL is a private company incorporated in Australia. It is the ultimate parent company of the Nova group of companies depicted below, and wholly owns NSAPL, with approximately 780 direct employees across the group.

Legal Structure of Nova Group

Nova Systems is primarily an engineering services and technology solutions business with offices in Australia, New Zealand, Singapore, the United Kingdom, Norway, and Ireland. Operational management decisions for group businesses outside the ANZ region are made by the boards of Nova Systems' subsidiaries in each relevant jurisdiction. Nova Systems' group business operations are predominantly conducted through five business streams:

- Consulting – various professional services including engineering, safety and management consulting,
- Aviation Design/Systems Integration – provision of aviation design services and aviation products
- Global Alerting Platform (GAP) – provision of software as a service asset and lone/remote worker monitoring/management services and related services
- Geospatial – provision of geospatial consulting services, software development and configuration, sale of third party software applications, product development / sales (including commercial off the shelf software integration)
- Nova IGS Network – satellite ground monitoring services.

Nova Systems has a global supply chain consisting of more than 400 contracted suppliers, with supplier relationships in areas including ICT Services & Equipment, Property Services, Logistics, Consulting, Aviation Equipment Manufacturing, Aviation Engineering Services, Marketing & Promotional Goods, Office Suppliers and Corporate Clothing.

We selectively pursue relationships with suppliers that share our values in respect of ethics, social responsibility and sustainability. The nature of each supplier's industry, and the territory they operate from, is a relevant consideration in this regard, and Nova Systems expects its personnel to assess these factors when making purchasing decisions.

3. Risks of Modern Slavery Associated with Nova Systems

As an engineering services and technology solutions business, Nova Systems' operations generally present a low risk of modern slavery. We are however acutely aware that insidious modern slavery practices have the potential to intersect with most types of businesses to some degree, and we accordingly deploy mitigation measures informed by specific risk assessments.

Broadly, Nova Systems' procurement of products and services, both for internal group consumption and for on-selling to customers, is the most likely source of modern slavery risks.

The primary areas of Nova Systems business that may encounter modern slavery practices are the supply chains of ICT and office equipment. As an innovative, technologically oriented organisation, Nova Systems utilises reasonably large volumes of ICT equipment and services to support its business offerings. Certain business streams, such as Nova Systems GAP, also resell ICT hardware in conjunction with proprietary ICT services. The manufacturers of these complex ICT items have supply chains that may be of a greater risk of intersecting with modern slavery.

Nova Systems also procures corporate merchandise for group marketing and social purposes, some of which is manufactured overseas. Again, Nova Systems is cognisant that the suppliers of these types of goods may face a greater risk of modern slavery practices.

By progressively reviewing its practices, preparing this public statement, and engaging with our suppliers in respect of modern slavery risks, Nova Systems supports the efforts of government, responsible corporate entities, and the wider community in seeking to eradicate modern slavery.

4. Actions taken by Nova Systems to Address Modern Slavery Risks

Nova Systems acknowledges that the process of combating the risk of modern slavery in our supply chain is a dynamic and complex challenge. We are taking a proactive approach to minimise these risks, and this corporate commitment is led by NAPL's board and supported by its related companies and the broader Nova community.

Over the 2022 reporting period, Nova Systems' enhanced mitigation actions included:

- Establishment of Nova Systems' Operational Framework which provides a holistic governance structure, mandating core policies and processes including Nova's Code of Conduct, our Compliance Policy, Corporate Social Responsibility Policy, Overseas Entity Policy and Whistleblower Policy. The Operational Framework reflects Nova's commitment to good governance and social responsibility, and outlines how we operate, the roles and responsibilities of senior leaders, and how all employees must conduct themselves in the course of business. Nova Systems' efforts to mitigate modern slavery risks are well complemented by this clear and comprehensive governance suite.
- Commencement of the rollout of the biannual Operational Assurance Statement through which senior leaders across the group are required to report on compliance with core Operational Framework policies and procedures. In addition to auditing business compliance with essential governance standards, this process will allow Nova Systems to continually test and evolve the Operational Framework.

- Undertaking desktop reviews of publicly available information provided by Nova Systems' partners and major suppliers detailing their policies, processes and efforts to combat modern slavery including, where applicable, reporting in accordance with local jurisdictional requirements. This has allowed Nova Systems to obtain a high level of understanding of the risks of modern slavery potentially incorporated in Nova Systems' core supply chain, and the associated mitigation actions that our suppliers are taking.
- Conducting an internal risk assessment of its Australian operations, the operations of its overseas group entities, and of its core partners and suppliers regarding modern slavery. This assessment took into consideration risk factors such as the sector, industry, types of products and services, geographic locations and business models. While the assessment concluded that Nova Systems' business practices overall present a low risk of modern slavery, the process promotes awareness amongst Nova employees and contractors on this issue. Nova Systems will periodically re-assess this risk and adopt enhanced mitigation measures as required.
- Completing detailed planning to establish a centralised group procurement function (anticipated in 2023) to oversee and regulate group purchasing and supplier selection decisions. This will provide a standardised interface with industry and act as a key driver for ESG initiatives.
- Nova Systems has developed an enhanced ICT procurement checklist and vetting questionnaire, specifically targeted to an area of organisational expenditure with higher modern slavery risks. The ongoing application of this process has positively impacted vendor selection decisions by steering expenditure away from high-risk (often, cheaper) jurisdictions, in favour of lower risk jurisdictions.
- Reinforcing Nova Systems' commitment to sovereign capability priorities – this has driven a preference towards Australian suppliers where practicable (which generally present lower modern slavery risk profiles).

Ongoing vigilance is required to mitigate modern slavery risks, and Nova Systems will continuously refine and evolve its strategy in this regard. We intend to focus our efforts over the next reporting period on the following:

- Enhanced procurement governance and related policy frameworks;
- Consolidating organisational approaches to corporate social responsibility/ESG matters
- Renewing our organisational risk assessment;
- Reviewing governance control measures, including the efficacy of Operational Assurance Statement processes
- Maintaining supplier and partner engagement on this issue;
- Provision of further information for Nova Systems' employees on the topic of modern slavery; and
- Developing an updated Statement on Modern Slavery.

5. How Nova Systems is Assessing the Effectiveness of its Actions

To monitor the effectiveness of Nova Systems' efforts to address modern slavery risks in its business, the risk of modern slavery has been entered into our formal risk framework using the newly implemented Predict! risk management tool. This step ensures ongoing visibility of, and attention to, this type of risk by Nova Systems' officers and senior management as part of Nova Systems' systematic global risk management procedures. Risk profile variations and enhanced mitigation measures are captured as part of this process.

The results of scheduled risk register reviews are reported to the Board of Nova Systems biannually pursuant to a formal Nova Systems' board deliverables calendar.

Nova Systems will continue to develop complementary techniques and processes to enhance our ability to assess the effectiveness of our modern slavery risk mitigation efforts.

6. Nova Group Consultation Process

Nova Systems has prepared this statement with input from its centralised corporate support functions responsible for supporting all group entities, including group Legal & Commercial, People, Finance, Strategy & Corporate Affairs, and Security & Technology Services functions. In addition, detailed consultation has taken place with Nova Systems' global executive committee and regional industry engagement functions.

7. Nova Group Pledge

Nova Systems has a proud history of improving the communities in which it operates, and we recognise there is always scope for more improvement. We are committed to the ongoing delivery of initiatives and partnering with our suppliers and industry to help eradicate modern slavery.

This statement was approved by the principal governing body of Nova Systems, the Board of Directors of NAPL, on behalf of both NAPL and NSAPL on 8 December 2022.
Signed,

Julie Cooper

Julie Anne Cooper
Chair Nova Group