



MODERN SLAVERY STATEMENT 2021

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.

Introduction

This joint statement is the second Modern Slavery Statement for Nova Aerospace Pty Ltd ABN 11 090 818 214 ('NAPL'), and the first 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') for the purposes of the *Modern Slavery Act 2018* (Cth).

Nova is proud to be one of the leading professional services firms 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 for our customers, our employees and the broader community.

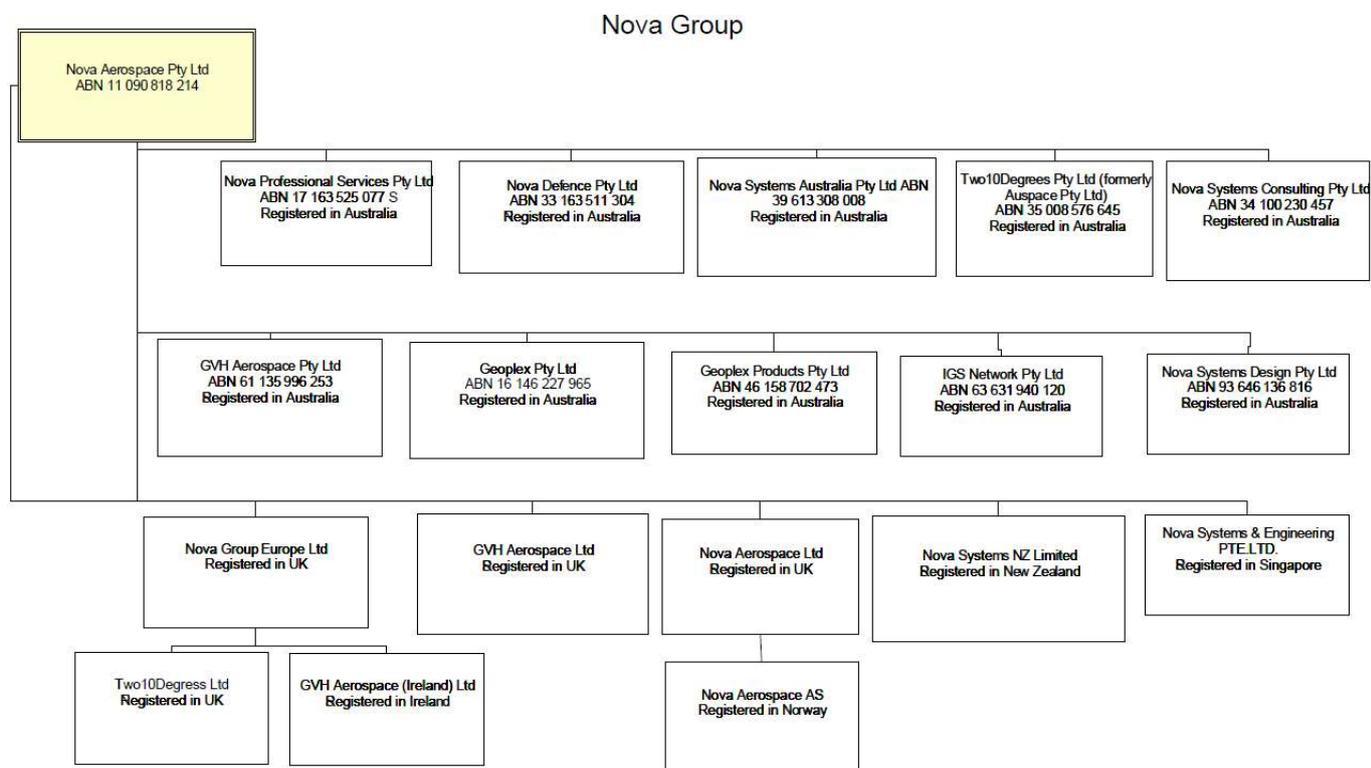
We have a robust policy suite in place that promotes ethical and legally compliant business conduct through governance, primarily driven by Nova's Operational Framework, core policies under this framework (including Nova's Code of Conduct, Whistleblower Policy and Compliance Policy), and supported by integrated reporting mechanisms. Our policy framework reflects our dedication to prevent Nova's business practices contributing to violations of human rights such as modern forms of slavery. This is one aspect of Nova's broad commitment to corporate social responsibility, covering key areas such as: indigenous reconciliation, sustainability and the environment, equity and diversity, and is embodied in formal organisational functions such as our IDEAL (Inclusion, Diversity, Equality, Action and Leadership) Committee.

Nova seeks to do business with suppliers that share similar values, ethics and sustainable business practices, including those related to human rights. Nova recognises that as a responsible corporate citizen its business conduct, and also 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.

Nova's 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 725 direct employees across the group.



Nova is primarily a professional services firm, currently operating offices across Australia, New Zealand, Singapore, the United Kingdom, Norway, and Ireland. Operational management decisions for group businesses outside of the ANZ region are made by the boards of Nova subsidiaries of each relevant jurisdiction. Nova's group business operations are predominantly conducted through five business streams:

- Nova Systems – various professional services including engineering, safety and management consulting
- GVH/Nova Systems Design – provision of aviation design services and aviation products
- Two10degrees – provision of software as a service asset and lone/remote worker remote monitoring/management services and related services
- Geoplex – provision of geospatial consulting services, software development and configuration, sale of 3rd party software applications, product development / sales (including COTS software integration)
- Nova IGS Network – satellite ground monitoring services

Nova has a global supply chain consisting of hundreds of 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 expects its personnel to assess these factors when making purchasing decisions.

Risks of Modern Slavery Associated with Nova

Predominantly a professional services firm, Nova's group 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's procurement of products and services, both for internal group consumption and on-selling to customers, is the most likely source of modern slavery risks.

The primary areas of Nova business that may encounter modern slavery practices are the supply chains of ICT and office equipment. As an innovative, technologically oriented organisation, Nova utilises reasonably large volumes of ICT equipment and services to support its business offerings. Certain business streams, such as two10degrees, 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 also procures corporate merchandise for group marketing and social purposes, some of which is manufactured overseas. Again, Nova is cognisant that the suppliers of these types of goods may face a greater risk of modern slavery practices.

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

Actions taken by Nova to Address Modern Slavery Risks

Nova 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 2021 reporting period, Nova's enhanced mitigation actions have included:

- Development of a subcontract template with specific anti-slavery provisions for incorporation into Nova's new group enterprise resource planning architecture.
- Development of a procurement questionnaire for incorporation into Nova's new group enterprise resource planning architecture, requiring all suppliers to provide information regarding policies and practices to address modern slavery risks
- Reviewing publicly available information of Nova's 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 demonstrated a high level of understanding of the risks of modern slavery on the part of Nova's core supply chain, and associated mitigation actions.

- Roll out of Nova's group Code of Conduct and mandatory, monitored training, reinforcing Nova's commitment to ethical and sustainable business practices.
- Introduction of internal ICT procurement guidance, designed to trigger consideration of modern slavery risks when selecting ICT suppliers.
- Increased utilisation of standard consultancy contractual terms containing specific anti-slavery provisions, where Nova procures services for internal support purposes.
- Conducting a risk assessment of its Australian operations, the operations of its overseas group entities, and core partners and suppliers. This assessment took into consideration risk factors such as the sector, industry, types of products and services, geographic locations and business models. While this assessment concluded that Nova's business practices present low modern slavery risks, Nova has increased awareness amongst Nova employees and contractors on this issue. Nova will periodically re-assess this risk and put additional measures in place as required.

Ongoing vigilance is required to mitigate modern slavery risks, and Nova 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 corporate social responsibility/ESG functions
- Renewing our organisational risk assessment;
- Reviewing and updating as required governance control measures;
- Maintaining supplier and partner engagement on this issue;
- Provision of further information for Nova employees; and
- Developing an updated Statement on Modern Slavery.

How Nova is Assessing the Effectiveness of its Actions

To monitor the effectiveness of Nova's efforts to address modern slavery risks in its business, this risk has been entered into our formal risk framework. Specifically, modern slavery risks are included as a standalone entry on Nova's organisational risk register. This step ensures ongoing visibility and attention of this type of risk by Nova's officers and senior management as part of Nova's 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. Periodic 'deep dive' reviews are also conducted on risk register items by Nova's executive and senior management teams.

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

Nova Group Consultation Process

Nova has prepared this statement with input from centralised corporate support functions responsible for supporting all group entities, including Group Commercial & Legal, Group People and Group Finance, Group Strategy & Corporate Affairs, and Group Security & Technology Services. In

addition, detailed consultation has taken place with Nova's global executive leadership team and regional industry engagement functions.

Nova Group Pledge

Nova 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, the Board of Directors of NAPL, on behalf of both NAPL and NSAPL on 13 December 2021.

Signed,

A handwritten signature in black ink that reads "Julie Cooper". The signature is written in a cursive, flowing style.

Julie Cooper
Chair Nova Group