Modern Slavery Statement 2023

Nova Systems condemns modern slavery in all forms and is committed to actively tackling this scourge on society.

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 the risk of modern slavery and human trafficking within our operations and supply chains and to implement appropriate actions to mitigate such risks.

Contents

1. Introduction

This joint statement is the fourth Modern Slavery Statement for Nova Aerospace Pty Ltd ABN 11 090 818 214 ('NAPL'), and the third Modern Slavery Statement for Nova Systems Australia Pty Ltd ABN 39 613 308 008 ('NSAPL') as reporting entities (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 that acknowledging and respecting human rights in our business dealings is fundamental to our business and highly important to 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 the Operational framework include Nova Systems' Code of Conduct, Whistleblower Policy, Compliance Policy and Operational Assurance 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, equality, inclusion and diversity.
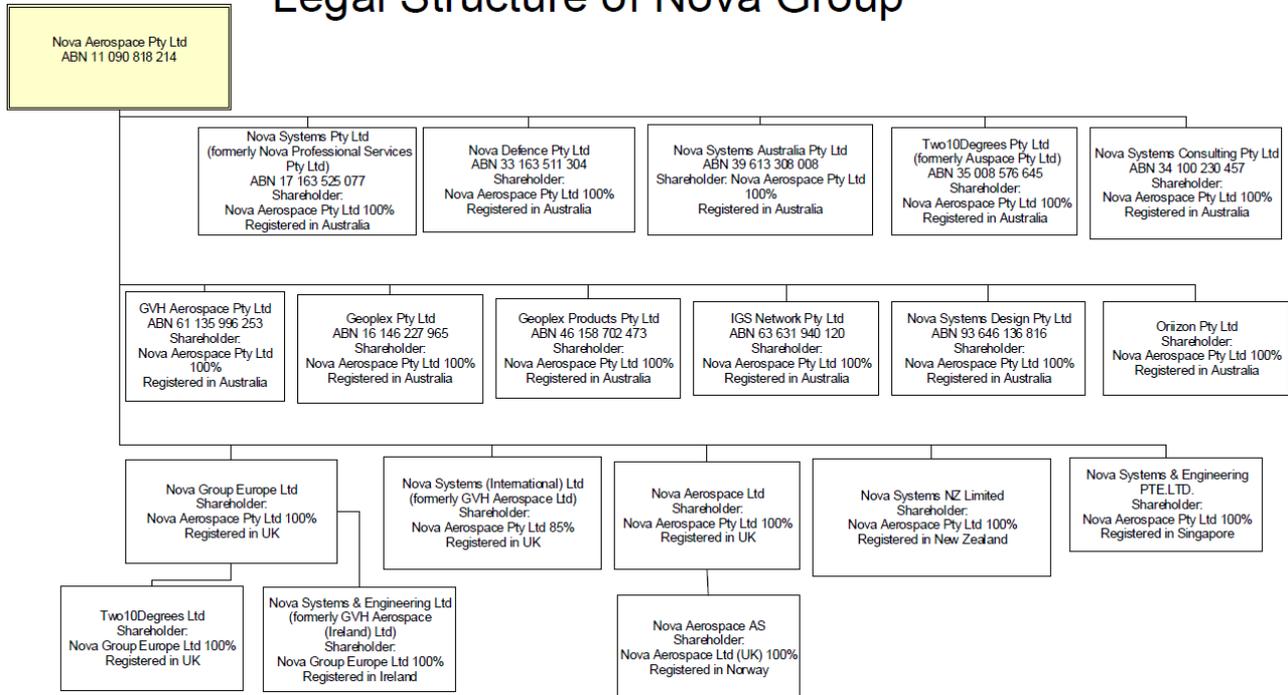
Nova Systems seeks to do business with suppliers that share similar values, ethics and sustainable business practices, including those related to human rights. Nova Systems recognises that as a responsible corporate citizen its business conduct, and the performance of its suppliers, has a significant 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 procedures, 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 Systems group of companies depicted below, and wholly owns NSAPL, with over 800 direct employees across the group.

Legal Structure of Nova Group

Nova Aerospace Pty Ltd
ABN 11 090 818 214

Nova Systems Pty Ltd (formerly Nova Professional Services Pty Ltd) ABN 17 163 525 077 Shareholder: Nova Aerospace Pty Ltd 100% Registered in Australia	Nova Defence Pty Ltd ABN 33 163 511 304 Shareholder: Nova Aerospace Pty Ltd 100% Registered in Australia	Nova Systems Australia Pty Ltd ABN 39 613 308 008 Shareholder: Nova Aerospace Pty Ltd 100% Registered in Australia	Two10Degrees Pty Ltd (formerly Auspace Pty Ltd) ABN 35 008 576 645 Shareholder: Nova Aerospace Pty Ltd 100% Registered in Australia	Nova Systems Consulting Pty Ltd ABN 34 100 230 457 Shareholder: Nova Aerospace Pty Ltd 100% Registered in Australia
GVH Aerospace Pty Ltd ABN 61 135 996 253 Shareholder: Nova Aerospace Pty Ltd 100% Registered in Australia	Geoplex Pty Ltd ABN 16 146 227 965 Shareholder: Nova Aerospace Pty Ltd 100% Registered in Australia	Geoplex Products Pty Ltd ABN 46 158 702 473 Shareholder: Nova Aerospace Pty Ltd 100% Registered in Australia	IGS Network Pty Ltd ABN 63 631 940 120 Shareholder: Nova Aerospace Pty Ltd 100% Registered in Australia	Nova Systems Design Pty Ltd ABN 93 646 136 816 Shareholder: Nova Aerospace Pty Ltd 100% Registered in Australia
				Oriizon Pty Ltd Shareholder: Nova Aerospace Pty Ltd 100% Registered in Australia
Nova Group Europe Ltd Shareholder: Nova Aerospace Pty Ltd 100% Registered in UK	Nova Systems (International) Ltd (formerly GVH Aerospace Ltd) Shareholder: Nova Aerospace Pty Ltd 85% Registered in UK	Nova Aerospace Ltd Shareholder: Nova Aerospace Pty Ltd 100% Registered in UK	Nova Systems NZ Limited Shareholder: Nova Aerospace Pty Ltd 100% Registered in New Zealand	Nova Systems & Engineering PTE.LTD. Shareholder: Nova Aerospace Pty Ltd 100% Registered in Singapore
Two10Degrees Ltd Shareholder: Nova Group Europe Ltd 100% Registered in UK	Nova Systems & Engineering Ltd (formerly GVH Aerospace (Ireland) Ltd) Shareholder: Nova Group Europe Ltd 100% Registered in Ireland	Nova Aerospace AS Shareholder: Nova Aerospace Ltd (UK) 100% Registered in Norway		

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 Nova Systems businesses outside the ANZ region are made by the relevant boards of Nova Systems' subsidiaries in conjunction with senior management in each relevant jurisdiction. Nova Systems' business operations are predominantly conducted through five business streams:

- Nova Systems – various professional services including engineering, safety and management consulting;
- Nova Systems International/Nova Systems Design – provision of aviation design services, aviation products and mission system integration services;
- GAP (Global Alerting Platform) – provision of software as a service asset and lone/remote worker monitoring/management services and related services;
- Nova Systems 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); and
- Nova IGS Network – satellite ground monitoring services.

Nova Systems has a global supply chain consisting of more than 300 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 it operates 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 company 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, and service providers for Nova Systems' offices such as cleaning and catering services. 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 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.

During the 2023 reporting period Nova Systems implemented the Oracle Cloud Enterprise Resource Planning application suite to manage functions such as accounting, financial management, project management and procurement. This has resulted in an increased engagement of overseas based resources to provide software support. Nova Systems understands such engagements may create an additional source of risk in our supply chain.

Nova Systems also procures corporate merchandise for 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, making 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 2023 reporting period, Nova Systems' enhanced mitigation actions included:

- The appointment of a Head of Procurement and Supply Chain and the establishment of a centralised procurement function to oversee and regulate purchasing and supplier selection decisions across Nova Systems. The formal establishment of this function supports Nova

Systems undertaking a standardised due diligence process when engaging new suppliers or renewing contracts aimed at ensuring that suppliers meet appropriate standards.

- The appointment of a Director of Governance, Risk and Compliance to enhance Nova Systems' risk management and risk oversight practices, including in respect of modern slavery risks.
- Matured application of Nova Systems' Operational Framework which provides a holistic governance structure, mandating core policies and processes including Nova's Code of Conduct, Compliance Policy, People and Performance Policy and the Oversees Entities Policy.
- Maturation of the biannual Operational Assurance Statement processes through which senior managers are required to report on compliance with all Operational Framework policies and procedures.
- Ongoing review 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 further risk assessment of our Australian operations, the operations of the overseas group entities, and of 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 the assessment still concludes that Nova Systems' business practices present low modern slavery risks, the assessment has led to increased awareness amongst Nova Systems' employees and contractors on this issue. Nova Systems will periodically re-assess this risk and put additional measures in place as required.
- The ongoing use of Nova Systems' ICT procurement questionnaire has contributed to more informed vendor selection decisions.
- Updating the Nova Systems Standing Offer for Subcontractor Services, under which subcontractors are typically engaged, to include the requirement that subcontractors must comply with any applicable anti-slavery and human trafficking laws and not engage in any activity, practice or conduct that would constitute an offence under Australian anti-slavery and human trafficking laws.
- Nova Systems also performs due diligence on the modern slavery mitigation practices of potential subcontractors as part of its standard subcontractor onboarding process.

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:

- Enhancing procurement governance and related policy frameworks;
- Consolidating organisational corporate social responsibility and environmental and governance functions;
- Enhancing our risk management and risk oversight practices;
- Reviewing the effectiveness of our governance arrangements;
- Ongoing dialogue with suppliers and partners on combatting modern slavery;
- Raising the awareness of modern slavery among Nova Systems' employees; 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 risks of inadequate supply chain management have been entered into our formal risk framework using the Predict! risk management tool. This step ensures ongoing visibility of, and attention to, these types of risk for Nova Systems' officers and senior management as part of Nova Systems' systematic global risk management procedures. Nova Systems also monitors the external business environment for any changes that might impact our exposure to modern slavery risks.

Nova Systems' assesses the effectiveness of its actions to combat modern slavery by adopting mature risk management and risk oversight practices to produce standardised data to identify risk, identify appropriate actions and to measure the effectiveness of such actions to reduce risk exposure.

6. Nova Systems' Consultation Process

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

7. Nova Systems' Pledge

Nova Systems has a proud history of improving the communities in which it operates, however 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 11 December 2023.

Signed

Kenneth Williams
Chair Nova Aerospace Pty Ltd