

A woman with dark hair tied back, wearing a dark blue shirt, is focused on working with a large, complex piece of machinery in a factory or industrial setting. The background is filled with various mechanical parts and structures, creating a sense of a busy manufacturing environment. The lighting is somewhat dim, highlighting the worker and the machinery.

Thales Australia
**Modern Slavery
Statement**
2023

THALES
Building a future we can all trust

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ACKNOWLEDGEMENT OF COUNTRY

Thales Australia acknowledges that our sites and facilities are located on the ancestral lands of Australia's First Nations peoples. We pay our respect to the past and present Traditional Custodians and Elders of this nation and the continuation of cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander peoples.

Statement from our CEO

As an Australian company with a global footprint in Defence, Security, Aerospace, Cyber, and Digital Security sectors, Thales Australia is committed to integrating corporate responsibility into every aspect of our work. An Australian prime like no other, we uphold a culture of safety, compliance, accountability and governance, that is essential to meeting the needs of our people, communities, and nation.

We recognise our role in eliminating modern slavery and advancing human rights. Our zero-tolerance towards modern slavery is fundamental to our business practices, employment standards, and partnerships. We are dedicated to ensuring our operations and supply chains are free from exploitation and operate with integrity.

At Thales, our mission is to **build a future we can all trust** that is safer, greener and more inclusive. Our approach to human rights is supported by robust governance frameworks, comprehensive risk assessments, and effective risk management and remediation measures.

This is our fourth statement under the Modern Slavery Act. We are continuing to make progress in mitigating modern slavery risks and over the last 12 months, we have focussed on raising internal awareness and enhancing our modern slavery compliance program, including developing specialised training for our people.

The Thales Australia Board, Executive Leadership Team and our parent company, Thales Group, are committed to continuously improving our approach to managing the risk of modern slavery. We look forward to implementing recommendations from the Government's review of the Modern Slavery Act to further strengthen our efforts.



About Thales Australia

At Thales Australia, we transform cutting-edge technologies into imaginative and resilient solutions. Operating in diverse markets including defence, aeronautics, digital identity and digital security, we provide essential solutions, services, and products with a focus on creating human-centric, sustainable innovations that empower our customers to navigate complexity with confidence. As part of the Thales Group, a global technology leader, we invest in digital and deep tech advancements, including connectivity, artificial intelligence, cybersecurity, and quantum technology. Our mission is to make the world safer, greener, and more inclusive, fostering a future we can all trust.

Thales Australia collaborates closely with local small and medium enterprises, resulting in advanced technology solutions that address complex challenges. Whilst our operations are primarily within Australia, our products and solutions are utilised by customers across the Asia Pacific, Europe, the Middle East, Central America, and Africa. Our corporate headquarters are located in Sydney, with branches in Taiwan, the Philippines, and Singapore.

Reporting Entity

This is the 2023 Modern Slavery Statement ('Statement') for Thales Australia Limited ACN 008 642 751 ('Thales Australia') prepared in accordance with the requirements of the Commonwealth Modern Slavery Act 2018 ('the Act') for the reporting year ending 31 December 2023. Thales Australia is a subsidiary of Thales Australia Holdings Pty Limited (ACN 058 583 841) ('Parent Company'). The Parent Company is ultimately owned by Thales SA, which is a French société anonyme (joint-stock company), identified with number 552 059 024.

Thales Australia is the only entity of the Parent Company covered by this Statement. Other entities of the Parent Company either do not meet the reporting criteria under the Act, or will produce their own Statement.

References to 'us', 'our', and 'we' in this Statement are references to Thales Australia. We refer to Thales SA as 'Thales Group' or 'Group' in this Statement.

Whilst not covered by this statement as they do not meet the reporting requirements, the actions taken to mitigate the risk of modern slavery detailed in this Statement are

applicable to the following subsidiaries of the Parent Company as a result of common internal rules, processes and procedures:

- Thales DIS Australia Limited (ABN 72 066 223 685)
- Thales DIS CPL Australia Limited (ABN 17 001 745 375)
- Multos International Pty Ltd (ABN 74 132 595 094)

Modern Slavery is a term used to describe situations where coercion, threats or deception are used to seriously exploit victims and undermine or deprive them of their freedom. This includes acts of human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

In preparing this statement, Thales Australia recognises that substandard working conditions or the underpayment of workers are practices which, left unaddressed, may escalate into modern slavery. We do not tolerate modern slavery in any of its forms as part of our commitment to corporate responsibility.



Overview of our operations

Thales Australia operates in the following market segments:



AERONAUTICS

Making aviation safer, easier and more efficient

We deliver advanced operational and navigational control capabilities involving air traffic management solutions, navigational aids, detection and communication systems, air traffic control centres, simulators, and avionics and electronics for military and civilian aircraft.



DEFENCE AND SECURITY

Helping governments, armed forces and major organisations to protect citizens and critical infrastructures

We install, support and integrate a wide spectrum of systems, equipment and services for military forces involving: protected military systems, vehicles, small arms, soldier systems, ordnance, munitions, optronics, and integrated logistics. Thales also delivers networked maritime warfare solutions, sonar and underwater systems, mine warfare, electronic warfare, radars, command and control, mission and unmanned aerial vehicle systems, land vehicle simulators and training environments. In the Information Communications Technology (ICT) space, Thales provides ICT solutions to defence and other national security organisations involving secure systems, encryption products and solutions, electronic security, software, networks cybersecurity and communications.



DIGITAL IDENTITY AND SECURITY

Building trust in a connected world, and protecting critical infrastructure and essential digital services from cyberattacks.

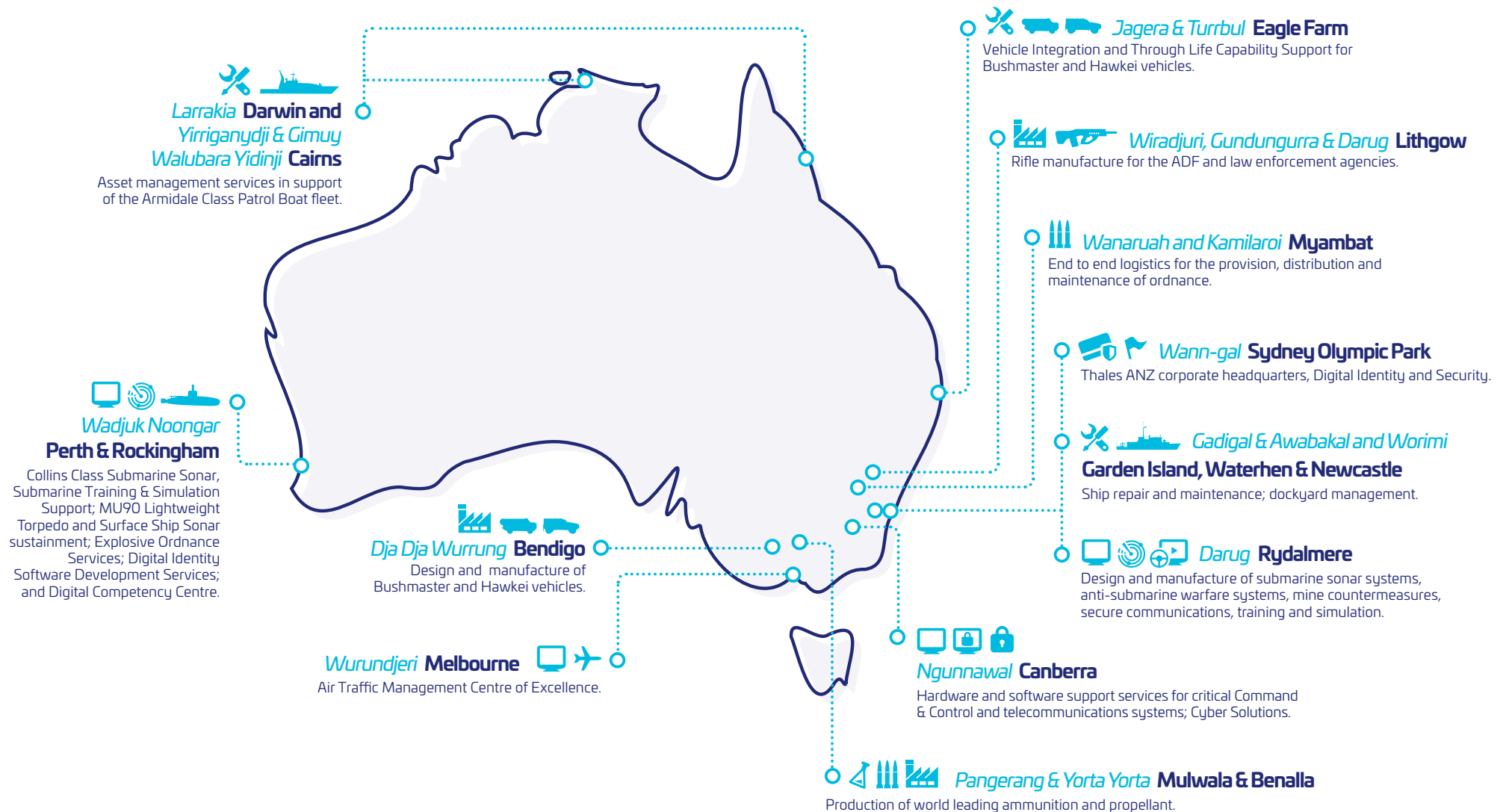
We provide banking and payment services, cloud protection and identity and access management, and identity and biometric solutions to help organisations accelerate their digital transformation. Our customers include the world's largest companies and governments – who rely on our technologies to authenticate identities and protect data exchange.

4,300 employees

Delivering solutions that make tomorrow possible, today

Building a future we can all trust.

 **Taiwan, Singapore and the Philippines**
Air Traffic Management systems



Overview of our supply chain

Where tier 1 procurement spend commitment was equal to or greater than 0.25% of total spend in 2023.



OUR SUPPLY CHAIN

Thales Australia's supply chain is complex, global and multi-tiered. Our supply chain refers to the goods and services we procure through subcontractors, suppliers and service providers (collectively referred to as 'suppliers' in this Statement). We procure goods and services from suppliers in Australia and overseas via our centralised procurement team which enables the application of common policies and practices

when implementing our risk management practices across core subjects, including the measures to be taken in respect to human rights and modern slavery. In 2023, we procured approximately \$540 million in services and goods both locally and abroad.

[^] by percentage of total spend commitments in the reporting period vs last reporting period.

Our Values

THALES



To succeed, we must work as partners with our customers, listening to them, anticipating their needs and finding solutions together. Building customer trust is always our priority. This equally applies to a joint effort to address the issue of modern slavery.



We share responsibilities in a culture of loyalty, partnership and transparency and look to our colleagues both locally and abroad when addressing our risks. Collaboration and unity in our actions allows us to leverage the knowledge and insights that come from being a global organisation.



Supporting the professional development of each employee is fundamental and this includes the promotion of awareness understanding of modern slavery risks. Dialogue is encouraged and we provide opportunities to promote open conversation about the actions we are taking.



We understand that acting responsibly means making realistic commitments and delivering on our promises. We strive to achieve excellence by acting with integrity, accountability and professionalism in everything we do.



We aim to continually improve quality and work more efficiently. We understand the importance of having strong foundations in place that enable us to demonstrate our commitment to these principles as well as social responsibility.

Identifying and assessing the risk of modern slavery

Modern slavery is defined as situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Eight types of serious exploitation are specified in the Act, including trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

Thales Australia acknowledges its potential exposure to the risk of modern slavery. When assessing the risk of modern slavery within our operations and supply chain we considered whether we may cause, be linked to, or contribute to modern slavery. We have considered the potential modern slavery risks across our operations and supply chain by taking into account geographic risk, sector risks, and products and services risk. This assessment is informed by the Group's mapping of risks relating to human rights, the environment and health and safety which draws on external data sources, internal reports and interviews.

Our Operations

At Thales Australia, our workforce is at the heart of everything we do. With approximately 4,300 employees, most of whom are employed in Australia, we recognise their integral role in our success.

Around 90% of our people are directly employed by us, and covered by the Commonwealth's Fair Work Act, anti-discrimination legislation, and in most cases, under a Fair Work approved enterprise agreement. These legislative instruments provide employment and health and safety standards within a legal framework. We found there is a low risk of modern slavery within our workforce and operations.

The remainder of our workforce is engaged through 2 labour hire and contingent worker providers. We have strong relationships with these providers, and our contracts contain provisions to mitigate the risk of modern slavery in these employment arrangements and they are required to sign up to our Integrity & Corporate Responsibility Charter. Labour hire and contingent worker contracts are also subject to employment standards and safety legislation.

We are committed to creating a workplace where our people prosper and this is reflected in our recruitment practices which include processes to ensure eligibility to work. We also undertake regular surveys of our people to measure employee engagement, and sentiment towards safety (in all its forms).



Our Supply Chain

Thales Australia relies on the procurement of goods and services through a diverse supply chain located in Australia and internationally to support our operations. Our procurement activities are centralised through our corporate procurement team who are trained on our procurement practices and can systematically implement our controls to identify and mitigate the risk of modern slavery.

In 2023, over 80% of our procurement spend occurred within Australia. Australia is regarded as having the lowest vulnerability to modern slavery in Asia and the Pacific, and the second lowest prevalence of modern slavery in the region.² Most of our purchasing activities occur in countries with similar government response ratings.



COUNTRY**	% ¹	VULNERABILITY SCORE ²	GOVT RESPONSE RATING ³	CPI RANK ⁴
Australia	80.24%	7	67	14
United States	6.08%	25	67	24
France	5.14%	13	62	20
Germany	3.87%	11	62	9
Israel	1.22%	35	45	33
India	0.94%	56	46	93
Belgium	0.85%	11	59	16
Italy	0.62%	22	59	42
Canada	0.41%	11	60	12

1 - Percentage of total procurement spend in 2023

2 - Global Slavery Index Vulnerability to Modern Slavery Score [<https://www.walkfree.org/global-slavery-index/map/>]

3 - Global Slavery Index Government Response Rating [<https://www.walkfree.org/global-slavery-index/map/>]

4 - Transparency International Corruption Perceptions Index rank [<https://www.transparency.org/en/cpi/2023>]

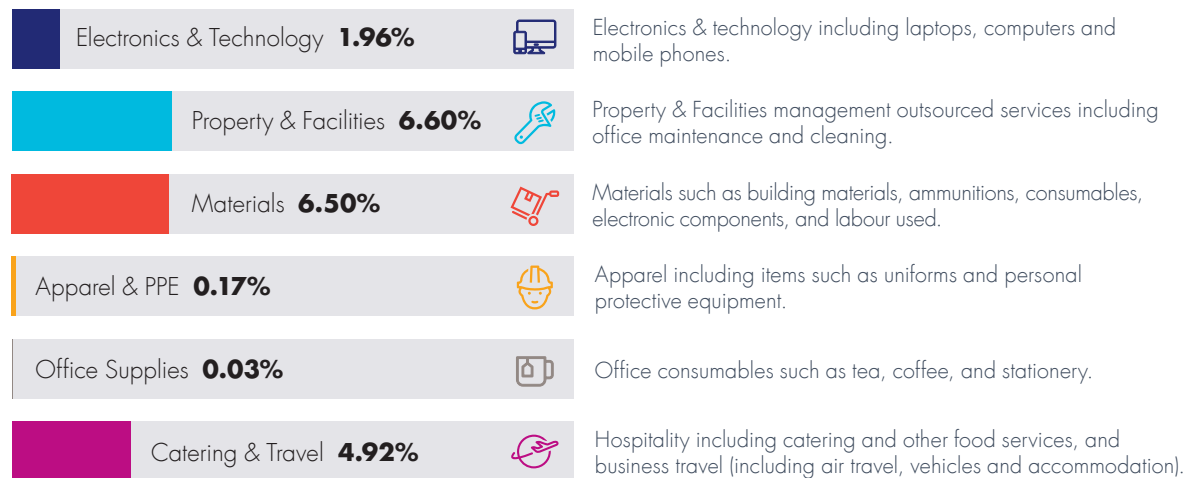
** Where tier 1 procurement spend commitment was equal to or greater than 0.25% of total spend in 2023

² Global Slavery Index Country Study – Modern Slavery in Australia accessed via <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

We have identified the following categories of goods and services as being of a potential higher risk of modern slavery according to the Global Slavery Index 2023. Spend across these categories accounted for 20.18% of our total spend in 2023.

Our spend across these categories increased from 2022, predominantly attributed to an increase in spend for catering and travel. The third parties engaged in relation to this spend are primarily located in Australia (which, for the reasons set out above has a lower risk exposure to causing, contributing or being linked to modern slavery practices). All travel arrangements are made through a third party provider, who is subject to the due diligence measures set out in this Statement.

PERCENTAGE OF SPEND BY CATEGORY



* % of total procurement spend in 2023

We consider we have robust controls in place to manage these risks and we address the actions we have taken to mitigate these risks in the next section of the Statement.



Actions taken to assess and address these risks

At Thales Australia, we are committed to preventing all forms of modern slavery within our operations and supply chain. Our approach prioritises the health and safety of people and communities while addressing potential violations of human rights and fundamental freedoms. Thales Australia and the Group have implemented a comprehensive strategy to detect, prevent, and mitigate modern slavery risks. This approach undergoes regular reviews to ensure its effectiveness. We remain dedicated to ongoing review and updates in our efforts to address modern slavery risks.



Policies & governance

At Thales Australia, we are committed to conducting all aspects of our business responsibly, safely and sustainably. Our robust governance and policy framework serves a strong foundation for assessing and addressing our modern slavery risks, and demonstrates our dedication to managing these risks effectively. Our approach to mitigating modern slavery is informed by this framework which is further reinforced by key policies outlining our commitment to respecting human rights.

POLICIES

These policies are accessible by employees through our centralised reference document system, with further information available on our public website.

- **Thales Group's Code of Ethics** communicates the standard of behaviour expected of all employees and suppliers to deliver our company purpose of "building a future we can all trust." This includes requirements to comply with commitments made by Thales Group to the *United Nations Global Compact* principles concerning human rights and labour standards.
- **Thales Group's Prevention and Detection of Corruption and Influence Peddling Policy** defines our framework for the management of corruption. This includes risk mapping processes, third party evaluation, incident management and continuous review. Compliance to the rules of ethical business conduct is of importance to Thales. This program is under regular review and in 2024, Thales Australia intends to seek certification under ISO37001 to recognise its efforts in managing corruption and bribery which is linked to modern slavery practices.
- **Thales Group's Code of Conduct** specifies the best practices for the prevention of corruption, provides guidance in respect of gifts and hospitality, and defines rules for interactions with third parties, including the management of conflicts of interest. It is supported by the **Group's Policy on Detection, Prevention and Management of Conflict of Interests**, which identifies the risks of conflict of interest situations and defines measures for dealing with real or potential cases.
- **Thales Australia's Whistleblowing Policy** (last reviewed in 2023) and the **Thales Alert Line** mechanisms are detailed in the Incident and Remediation section of this Statement on page 16.
- The **Group Procurement Policy** sets the standard for all procurement activities and supports our commitment to upholding the *United Nations Global Compact* concerning human rights, labour standards, environmental protection, and corruption prevention. This policy requires that suppliers complete a corporate responsibility assessment; which includes an assessment of compliance with social and environmental regulations and anti-corruption measures. It also sets out our expectations of the suppliers we engage with.



- **Thales Group's Integrity & Corporate Responsibility Charter** further outlines our expectations of the suppliers we work with. It is based on the *Code of Conduct of the International Forum on Business Ethical Conduct* and outline principles concerning human rights, employment practices, anti-corruption, responsible sourcing of conflict minerals, and health and safety. This must be agreed to by suppliers prior to us committing to conduct business with them. This is detailed further on page 15.
- A **Modern Slavery Compliance Program** was first developed in 2021, with regularly updates annually. Adopting the Thales Australia compliance management framework ensures the program reflects various facets of effective risk management when embedding anti-slavery practices into our operations.
- These policies are supplemented by our health and safety procedure and policies which cover various facets of workplace safety and underpin our mission to build a proactive safety culture and protect the wellbeing of our people.

GOVERNANCE & OVERSIGHT

Modern slavery is deeply ingrained into the Group's approach to Corporate Responsibility and Integrity. Our framework sets out the processes and procedures necessary to minimise the risks arising from corruption, bribery and modern slavery. Across the global organisation, governance committees have been established including the Integrity and Compliance Committee, Risk Assessment Committee, and Strategic and Corporate Social Responsibility Committee, with local management

committees being established such as the Ethics Committee, and Procurement Compliance Committee.

The Board oversees our operations and approves the annual modern slavery statement. Additionally, the Compliance, Audit and Risk Committee provides updates to the Board as needed. Comprising directors and members of the Thales Australia Executive Leadership Team, this committee assists the Board in fulfilling its responsibilities related to modern slavery compliance.

A network of compliance officers has been established to provide advice to employees on compliance related issues, oversee the implementation of our compliance policies, and support the investigation of incidents.

CONTRACTUAL CLAUSES

Throughout 2023, we have consistently incorporated integrity and corporate responsibility clauses into our new and renewing supplier contracts. These contractual terms require our suppliers to take steps to ensure compliance with corruption laws and adherence to our Integrity & Corporate Responsibility Charter which addresses modern slavery. Additionally, these clauses serve to raise awareness amongst our suppliers of our expectation that they manage modern slavery risks arising within their own supply chain and operations.



Employee arrangements

The majority of our workforce are directly employed by us (as permanent, fixed term or casual employees). Their employment arrangements are governed by Fair Work legislation, which provides a safety net of minimum entitlements, enables flexible working arrangements and prevents employee discrimination. We have six enterprise agreements that have been assessed against the Fair Work Act and the relevant modern awards, and approved by Fair Work Commission. These enterprise agreements are registered and legally binding instruments.

The remainder of our workforce is made up of labour hire and contingent workers. Our contracts with the providers of these workers:

- provide for these workers to receive the rates set out under the relevant enterprise agreements (in line with our direct employees);
- require that providers warrant compliance with anti-slavery and human trafficking policies and legislation, and implementation of processes to assess their own modern slavery risks; and
- require that providers notify us of any actual or suspected modern slavery by a person or within a supply chain affecting our engagement.

We are continuing to implement a replacement time and record keeping management system to allow us to track the hours our employees work to ensure correct conditions are applied.





Supply chain due diligence

Thales Australia is committed to collaborating with suppliers who uphold human rights and actively address modern slavery risks. Our extensive supplier portfolio is managed through a centralised procurement team, enabling us to implement a comprehensive risk-based approach to supply chain management. This approach provides insights into the practices of our Tier 1 suppliers, identifies high-risk areas, and supports the establishment of mitigation plans. To enhance supplier management, we use a Group-wide procurement tool which serves as a single source of supplier information. It provides greater visibility and control over our procurement practices, and easily manages our due diligence and risk management processes. As it integrates with our supplier portal, our suppliers can view our Integrity & Corporate Responsibility Charter, update information held, and respond to questionnaires.

THE INTEGRITY AND CORPORATE RESPONSIBILITY CHARTER

Relationships with our vendors begin with a commitment from our suppliers and partners to adhere to the principles set out in the Integrity & Corporate Responsibility Charter. Non-compliance to the charter may result in the implementation of a remediation plan, and in cases of continued or severe non-compliance, the termination of their contractual relationship with us. Our suppliers must ensure that their own suppliers and subcontractors, partners and associates comply with the same requirements set out in the charter.

VENDOR SCREENING

We follow the Thales Group process for vendor screening. This process has been developed through extensive mapping of Thales Group's supply chain, and its risks relating to human rights, health and safety, and corruption. It considers the type of purchase and the supplier's country of operation to generate a risk rating. The resultant rating determines the mitigating actions we will take to address modern slavery and corruption. These actions may require a supplier to undergo a corporate responsibility assessment and/or integrity assessment (detailed further in this section).

CORPORATE RESPONSIBILITY ASSESSMENT

We have engaged a third-party assurance organisation to help us better understand our supply chain and identify modern slavery risks. During onboarding, we provide supplier details to a third-party who provides an assessment of risk in the categories of human rights violations, environmental harm or poor health and safety. Suppliers assessed as high risk are required to undergo a further assessment process which includes;

- completion of a self-assessment questionnaire in which they provide details of their due diligence processes in relation to human slavery in their operations and supply chains and steps taken to assess and manage that risk.
- a desktop verification undertaken by the third-party's compliance experts to assess the responses to the questionnaire and validate whether they comply.
- if a supplier is not able to be validated, they are requested to complete a corrective action plan which requires them to provide further evidence of improvement in areas of concern.
- we may request the third-party complete a workplace condition assessment of a supplier. This involves a thorough review of their work conditions, management systems and corporate governance arrangements.

INTEGRITY ASSESSMENT

We are committed to building relationships with suppliers that are based on trust and dedication to corporate responsibility. To support this commitment and the implementation of our Code of Conduct, we may request suppliers to complete an integrity assessment. We use the Corruption Perception Index to identify suppliers in geographic locations of risk, supplemented by information about the supplier's governance structures, and ethics and compliance policies. This enables us to build a risk profile and identify any areas which may indicate behaviour below the standard expected of our suppliers.

Responses to the integrity questionnaire are reviewed to identify potential risk factors that require further investigation. If found, and before the engagement can commence, the supplier is referred to a third party to conduct an in-depth investigation with the view of identifying any remediation steps or action plans to be implemented. Through this process we may also identify factors which prevent us from engaging with that supplier.

We recognise that assessing and addressing the risk of modern slavery in our extended supply chain (that is, beyond Tier 1) is a key challenge requiring further work to manage.



Grievance & remediation processes

We expect our people and suppliers to act consistently with our Code of Ethics and core values. In keeping with those values, we encourage our employees and others we work with to come forward through our whistleblowing process if they see conduct that they believe is problematic. Our **Thales Australia Whistleblower Policy** sets out the protections available to whistleblowers, and instructions on how to make a disclosure; including who is authorised to receive a disclosure and the whistleblower's right to a fair and independent investigation of disclosures.

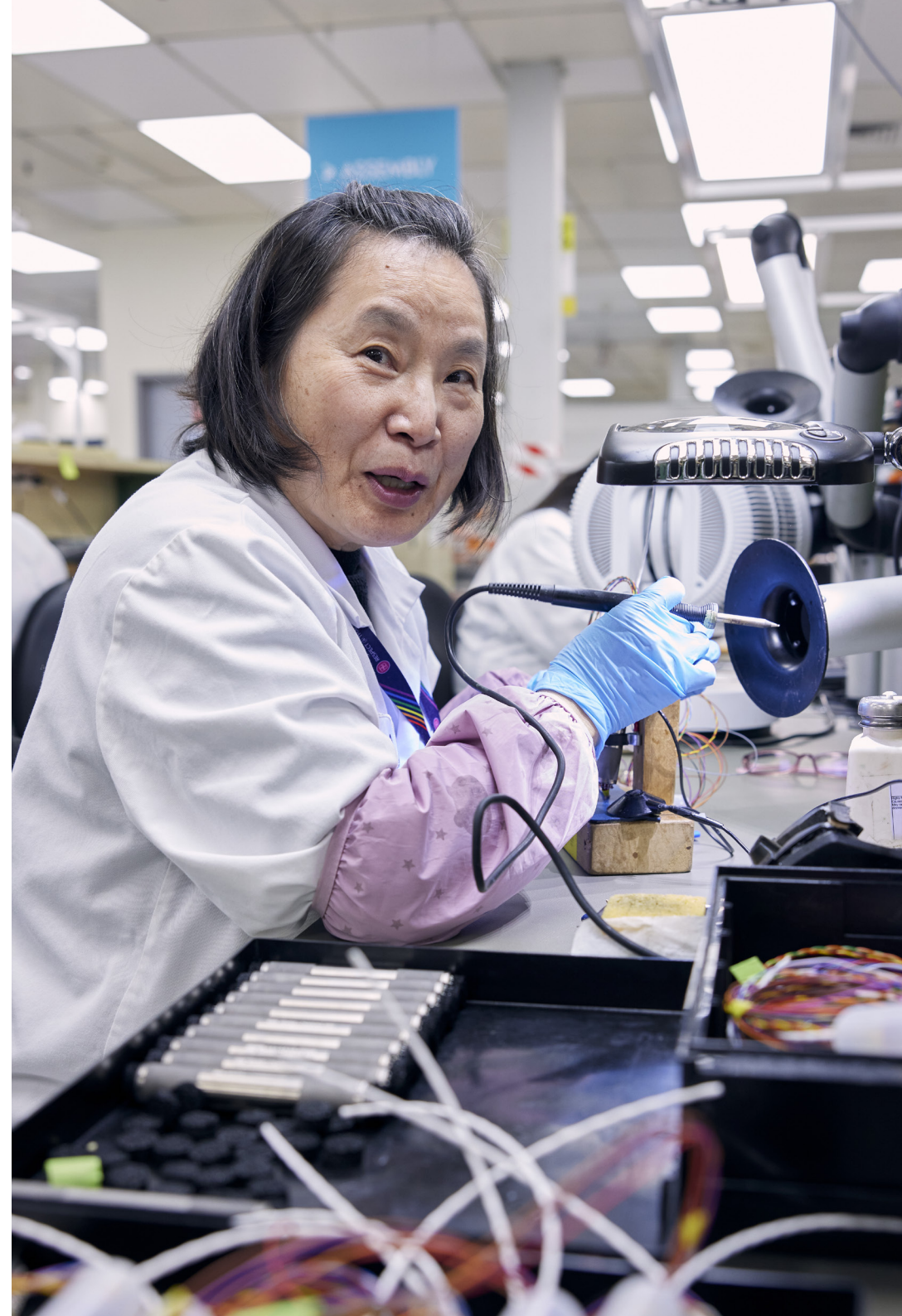
The Group internal alert system is also utilised within this process, as it enables named or anonymous reporting of concerns or incidents resulting from our activities or those of our suppliers that are relating to misconduct, abuses of human rights and fundamental liberties, and harm to health and safety.



Training & awareness

At Thales Australia, we prioritise training to enhance the skills and awareness of our procurement teams and people managers regarding modern slavery risks. From the outset of their employment, our employees receive information about our expectations related to modern slavery, equal treatment, discrimination prevention, respect, and maintaining a safe and healthy work environment. New hires undergo an ethics awareness module during onboarding, and our Code of Ethics is systematically distributed, with acknowledgment required from new employees.

Information about our comprehensive approach to Ethics, Integrity, and Corporate Responsibility is available via our intranet to foster ongoing awareness and engagement across the organisation regarding modern slavery risks.



Assessing the effectiveness of these actions

We are committed to mitigating any modern slavery risks that may arise within our operations and supply chains, and towards building our maturity and understanding around this process. We are continually working to improve not only our modern slavery mitigation and prevention activities, but also our approach to assessing the effectiveness of our modern slavery actions.

Thales Australia has a strong risk culture that is embedded within our organisation in relation to modern slavery and corruption. This is outlined in our Code of Conduct, which is required to be acknowledged by all employees at onboarding. We believe this strong risk culture creates a safe environment that allows and encourages individuals to raise their concerns either through our Whistleblower program or Internal Alert system. During the reporting period, we received no disclosures in relation to modern slavery risks or breaches of our Integrity and Corporate Responsibility Charter in relation to modern slavery, although we acknowledge that a lack of disclosures does not necessarily mean the absence of modern slavery practices.

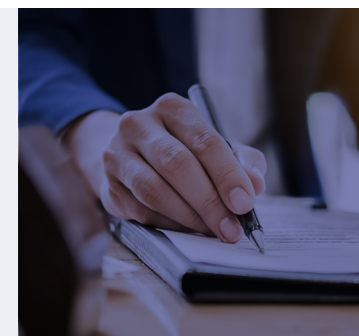
We consider our comprehensive due diligence procedures within our procurement process to play a vital role towards our efforts to tackling modern slavery. Risks associated with the procurement process are continuously monitored through procurement dashboards which consider certain indicators including the number of suppliers that have signed the Integrity & Corporate Responsibility Charter, and the

evaluation of these suppliers in terms of their Corporate Responsibility. Each year we participate in a Group-wide attestation process which addresses our actions taken on human rights, the health and safety of our employees, and environmental protection. This provides insights into the Group risk mapping and allows us to further understand avenues for improvement so that we can continue to enhance our current mitigation and prevention processes. Internal and external audits and reviews are performed regularly to ensure the terms and conditions of employment are applied correctly, our policies and procedures are implemented, and our training plan is adhered to.

Our Human Resources function is responsible for monitoring any anomalies or concerns, and report any identified issues to the compliance team. Where concerns are identified as a result of the review, these issues are further investigated to develop and implement the required remediation actions. We acknowledge that while Australia is considered to be a low risk geographic location, it is not immune from modern slavery. Further work is required to assess these risks of modern slavery within our local supply chain, and to evaluate whether additional measures are required.

The indicators shown below give us confidence that our mitigation measures are well implemented, and we will look to develop these further to enhance our methods of assessing the effectiveness of our actions.

Indicators	2023	2024 Target
Percentage of new supplier agreements containing modern slavery clauses	100%	100%
Percentage of completed new supplier assessments in third party CSR tool (as required)	>99.9%	100%
Percentage of employees that have acknowledged the Code of Conduct/Code of Ethics	100%	100%
Percentage of new suppliers that have signed the Thales Integrity and Corporate Responsibility Charter	>99.9%	100%



Consultation and approval

The Statement was developed with contributions from a working group made up of representative from across the organisation which met regularly during the statement preparation process to discuss the requirements of the Modern Slavery Act 2018, progress on our program of work, and actions taken to identify and mitigate modern slavery risks. Prior to review and approval by the Board, the Statement was reviewed by members of Thales Australia's leadership team.

This Statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth). It was approved by the Board of Directors of Thales Australia on 18th June 2024. It is signed by a responsible member of Thales Australia.



Jeff Connelly

Chief Executive Officer, Thales Australia



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