

NRT GROUP

MODERN SLAVERY POLICY

2020

Modern Slavery Policy

This policy informs suppliers, business partners, contractors, consultants and other third-party representatives (“**Supply Chain Partners**”) and employees of NRT Group Pty Ltd, ACN 613 550 655 (“**us**”, “**we**”, “**our**”) and its wholly-owned subsidiaries about our approach and their obligations in relation to prevention of modern slavery within our business and supply chain.

1. What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

2. Our Modern Slavery Policy

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity and transparency in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place in our own business or our supply chain.

Our own business

All employment with us is voluntary. We do not use or condone, child or forced labour in any of our operations or premises and work to ensure these practices are not present in our workforce or supply chain.

We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude. We abide by all laws and regulations regarding pay practices and the classification of employment according to job level and status.

Where we are made aware of modern slavery practices in own business or within our supply chain, we will investigate all claims and if valid, resolve the issue in line with the values expressed in this policy. We welcome any inquiries on what action an employee or contractor can take if they have a concern in relation to modern slavery.

Our focus for compliance is supported by risk assessments to determine which parts of the business (if any) are high risk for modern slavery.

Supply Chain Partners

We require our Supply Chain Partners to adhere to labor, health, safety and employment laws in the countries in which they operate, and to ensure that they put in place measures to prevent and address modern slavery. We expect that our Supply Chain Partners will hold their partners in their supply chain to the same high standards, including where they operate in high risk areas they include specific contractual prohibitions against slavery.

3. Compliance and reporting

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to:

- A. read and understand this policy;
- B. avoid any activity that might lead to, or constitute modern slavery; and
- C. raise any concerns and report any actual or suspected modern slavery within our business or in our supply chain to the NRT Group CEO or NRT Group Finance & Commercial Director.

We aim to encourage openness and will support anyone (whether employees within our own business or our Supply Chain Partners) who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain.

4. Breach of this policy

If we become aware of any facts to suggest that our employee or a Supply Chain Partner engages in modern slavery, we will ask our Supply chain Partners to investigate, and where appropriate, terminate the relationship and report to the responsible national or international authorities where necessary.

5. Communication

This policy is posted on our internal shared file drive for employees, included on our public website and is provided to all our Supply Chain Partners. Any changes to this policy in future will be notified to our employees and Supply Chain Partners.