

# Modern Slavery Policy

Nexon Asia Pacific Pty Ltd ACN 095 335 023

Period Financial Year 20-2021

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NEXON ASIA PACIFIC PTY LTD

ABN 70 095 335 023



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## 1. Modern Slavery and Purpose of Policy

Nexon Australia Pty Ltd ACN 095 335 023 (**Nexon**) is committed to the condemnation of modern slavery in all forms throughout the world, and the ultimate contribution to adopting an approach within our commercial trade and practices, which seeks to minimise the risk of modern slavery practices to the greatest extent possible.

Modern slavery can be articulated as the severe exploitation of persons for personal and commercial gain. Whilst modern slavery takes various forms throughout the world, the most common of which observed are as follows:

- (a) the use of violence and coercion for the recruitment of people in order to exploit them for purposes including but not limited to forced prostitution, labour, marriage, and organ removal;
- (b) the slavery of children for use as labour, soldiers, and marriage;
- (c) debt bondage slavery involving the entrapment of people in poverty in borrowing money, and the subsequently forced work to pay of such debt resulting in the loss of control of work conditions and the debt itself; and
- (d) any work or services people are forced to do against their will under the threat of punishment.

Alarming, it is estimated that approximately 40 million people are trapped in modern slavery regimes worldwide, generating an estimated USD\$150 billion annually within the global private economy from forced labour alone.

Of these numbers, a quarter can be attributed to children, and almost 71% attributed to women and children. Furthermore, approximately 24,990,000 people in the Asia-Pacific Region are considered to be enslaved, with an estimated 15,000 people being enslaved in Australia alone.

In light of the above, Nexon is committed to ensuring that the risk of modern slavery is reduced, by safeguarding that all supply chains, operations, employment, and relationships do not contribute to, or perpetuate practices related to modern slavery, whilst holding a zero-tolerance approach to any imposition of, or connection to, modern slavery and human trafficking.

This Policy supports the Act.

## 2. Nexon Company Structure and Operations

Nexon is an Australian private company managed by Chief Executive Officer Barry Assaf. In 2019 EQT mid-market Asia (Private Equity Fund) acquired a majority stake in the Nexon business. Co-founder and CEO Barry Assaf remains a significant shareholder in Nexon. Since its inception, Nexon has experienced sustained growth through a dynamic and continuously evolving business strategy.

For the financial year ended 2021 Nexon operated across 4 primary offices in Australia, with approximately 270 employees supporting our operations.

Most of our staff in Australia are full time with less than 3% of our workforce either part time or contractors. Nexon values the importance of getting to know its staff from the beginning of their careers, and therefore recruits employees and contractors directly and not through labour hire agencies.

Nexon's main operations includes providing secure networks, unified communications, cloud services, managed security, business solutions and digital workspace services, wrapped with Nexon managed IT services. Nexon procures the ICT equipment (where required), configure, and provides above services to its clients. Nexon operations also include sales and marketing of above services managed in our Australian sites.

Nexon engages with both onshore and offshore employees and contractors to provides the above services to its clients.

### 3. Application and Scope of Policy

Nexon is the reporting entity for the purposes of the Act.

The responsibility of ensuring that Nexon complies with the legal and ethical obligations of the Act sits with Nexon's Board of Directors. The Board of Directors conducts annual reviews on the Policy and ensures that all reporting obligations are complied with, including the examination and assessment of:

- (a) internal procedures in identifying modern slavery risks;
- (b) the consultation and audit process of Nexon's suppliers and/or contractors in respect of any areas of modern slavery risks;
- (c) current responses to any concerns regarding modern slavery or the risk of modern slavery;
- (d) education and training materials and programs to increase awareness of modern slavery risks in Nexon's supply chain; and
- (e) updating this Policy, as and when required.

This Policy applies to all employees, directors, officers, suppliers, and partners of Nexon, with the Board of Directors and management at all levels below ensuring and being responsible for Nexon's compliance with this Policy.

This is the initial publication of the Nexon Policy and applies for the FY20-2021 ended.

### 4. Definitions

Any capitalised terms used in this policy will have the meaning as defined below:

- (a) **Act** means *Modern Slavery Act (Cth) 2018* enacted by the Parliament of Australia on 29 November 2018, which may be amended from time to time.
- (b) **Authorised Representative** is the assigned individual within Nexon responsible for dealing with any reports and/or complaints from staff or affiliates in relation to any concerns regarding modern slavery issues at Nexon.
- (c) **Board of Directors** means the board of directors of Nexon, as appointed from time to time.
- (d) **Nexon** means Nexon Asia Pacific Pty Ltd ACN 095 335 023.
- (e) **Operations** means all activities undertaken by Nexon.
- (f) **Partner** means any person or organisation who is collaborating with Nexon or participating in any joint venture with or on behalf of Nexon.
- (g) **Policy** means this Modern Slavery Policy.
- (h) **Staff or Staff Member** means an employee of Nexon and includes casual employees.
- (i) **Suppliers** means any organisation or person who supplies Nexon with goods or services, and includes their offices, directors, employees, subcontractors, agents, related entities, and consultants.
- (j) **Supply Chain** means the product or service that contribute to Nexon's provision of their products and services, including those sourced both in Australia and worldwide and extending beyond direct suppliers.

## 5. Statement of Intent

This policy:

- (a) sets out Nexon's:
  - (i) commitment to respecting human rights and directly addressing modern slavery;
  - (ii) compliance framework for meeting reporting obligations set out in the Modern Slavery Act (Cth) 2018, which includes the preparation and publishing of annual statements on steps taken to identify and address the risks of modern slavery in operations and supply chains; and
  - (iii) standards of behaviour expected for employees, directors, officers, suppliers, and partners of Nexon.
- (b) identifies roles and responsibilities for implementing this policy; and
- (c) supports Nexon's values of respect and integrity.

## 6. Nexon's Approach to Limiting the Risk of Modern Slavery Practices

### 6.1 Modern Slavery Areas of Risk

Nexon has identified the following areas of the business that are most vulnerable to modern slavery:

- (a) our people: Nexon's most valuable asset is its people. Through its recruitment and retention practices, Nexon considers it is able to properly monitor and assess any risk of modern slavery.
- (b) our customers: Nexon is vigilant in ensuring that it does not implicate any customer in any modern slavery practices and that Nexon itself is not implicated through any practice of a customer which may be considered a breach of any anti-slavery policies adopted by Nexon.
- (c) our supply chain: Nexon often contracts with independent on-shore and off-shore third parties to provide services to assist Nexon, its people or contractors and its customers (**Contractors**). Nexon's commitment to recognizing modern slavery risks amongst its Contractors ensures ethical business practices between Nexon and the Contractor.

### 6.2 Assessing, controlling, and due diligence for any areas of risk

In conjunction with reputable research sources such as the United Nations Guiding Principles on Business and Human Rights, Nexon has implemented the following principles in assessing, addressing, and remediating any identified modern slavery risks:

- (a) Standards for Staff and Affiliates
  - In performing all duties, functions, roles, and responsibilities through their engagement with Nexon, the behaviour and conduct of all staff and affiliates must endeavour to reduce the risk of modern slavery, in ways including but not limited to the following:
    - (i) implement procedures and policies which address issues associated with modern slavery;
    - (ii) the avoidance of activities that may reasonably lead to or result in a breach of this policy;
    - (iii) carrying out all duties with integrity and the preservation of principles contained within this policy;

- (iv) ensure that any contractual terms of suppliers include a requirement for them to establish their own anti-slavery policy and evidence that such policy is adopted and carried out;
  - (v) encourage their suppliers to exceed the minimum standards of any anti-slavery policy;
  - (vi) monitor the supplier's performance in respect of implementing any anti-slavery policy by conducting regular assessments and policy reviews;
  - (vii) using best endeavours to exercise professional and ethical judgment at all times during their employment with Nexon;
  - (viii) treating all issues or concerns raised about modern slavery seriously, and with impartiality and sensitively, including the adoption of a whistleblowing policy and policies in respect of bullying, discrimination, harassment, sexual harassment, and victimisation;
  - (ix) if required, investigating allegations of modern slavery fairly and reasonably; and
  - (x) the application of appropriate due-diligence measures when dealing with third-parties for the purposes of engagement with Nexon.
- (b) Standards for Suppliers and Partners

Nexon expects particular minimum standards from all suppliers and partners, which include but are in no way limited to the following:

- (i) the demonstration of their commitment to identifying, assessing, and addressing modern slavery in their daily business operations and supply chains in which they operate;
- (ii) identify and mitigate risks of modern slavery existing in their operations and supply chains;
- (iii) not use any type of forced labour or bonded labour, and respect the freedom of movement of all workers including the freedom to leave their employer after reasonable notice;
- (iv) provide a safe and hygienic working environment, where workers receive adequate and regular training to perform their jobs in safe manner;
- (v) compliance with the minimum working age in the country or jurisdiction in which the supplier operates (or in absence of any applicable legislation, Convention 138 of the *International Labour Organisation*);
- (vi) transparent and accurate record keeping in respect of wages paid (including any further payments in respect of overtime and any other mandated benefits of the country or jurisdiction in which the supplier operates);
- (vii) written and comprehensible information in respect of the worker's employment conditions, wages and standards of the workplace before such employment commences;
- (viii) working hours imposed on the worker must comply with the applicable law in the country or jurisdiction in which the supplier operates;
- (ix) must not discriminate against any worker on the basis of their personal characteristics, gender, ethnicity, origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership, political affiliation, or any other factor that may cause the worker to be harassed, discriminated against or subject to inappropriate behaviour in the workplace;

- (x) comply with relevant local and national environmental protection laws;
  - (xi) work collaboratively with Nexon to prevent, mitigate, and remedy modern slavery in their operations and supply chains, and provide all information required by Nexon to gain an understanding of the measures in place to identify these risks; and
  - (xii) promptly notify Nexon of any suspected or actual incident or modern slavery as soon after becoming aware of it.
- (c) Prospective partners, suppliers, or affiliates of Nexon will be automatically disqualified from public association with Nexon in the event that they are knowingly or deliberately engaged in activities running in contravention of :
- (i) this policy;
  - (ii) principles of international humanitarian law; and/or
  - (iii) internationally recognised standards of human rights, labour rights and protection of health.
- (d) Implementing a corrective action plan (**CAP**):

Nexon understands and recognises that policy and procedure is important, however taking action upon any deficiencies identified through implementing such policy is just as equally important. Accordingly, Nexon has adopted the following procedure to ensure that any deficiencies in policy are addressed as a priority:

- (i) clear statement of issue – ensuring that the issue is being identified clearly and succinctly to prevent any misdirection in developing a response;
- (ii) identify methods to address or correct the issue – investigation to be undertaken to determine the possible corrective actions which may be undertaken to address the issue at hand, including assessments which map the effects such action may have (including on other functions of the business, the environment, and other priorities Nexon consider valuable);
- (iii) prioritise corrective actions that would have larger impact on addressing issue or limits the adverse impact of the issue – following the relevant assessment, Nexon to assess the most effective and efficient course(s) of action and proceed with same to minimise any further effects of a breach in policy;
- (iv) implement the CAP – carrying out any such corrective actions including engaging in any professionals and contractors to assist with same;
- (v) examine the CAP results – ensure that an assessment of any corrective action is carried out to determine whether such actions were effective and reviewing any further impact and ancillary consequences of the actions; and
- (vi) adjust the CAP accordingly – undertaking further policy review and implementation may be required to ensure no further breaches of policy or any other issues are addressed. This may include engaging with professionals to further develop any policies and methods to address issues in the company.

### 6.3 Reporting and Keeping of Records

- (a) Nexon agrees to conduct thorough reviews every six (6) month period detailing the following matters existing within their operations:
  - (i) modern slavery risks;
  - (ii) the steps taken to address these risks; and

- (iii) plans for continuous improvement within any areas of concern.
- (b) In addition, Nexon shall adhere to the requirements of the Act in respect of the preparation of the annual Modern Slavery Statement.

Staff and affiliates must report all concerns about possible modern slavery to the Authorised Representative at [corporate.compliance@corp.nexon.com.au](mailto:corporate.compliance@corp.nexon.com.au) as soon as reasonably practicable, and any such report or complaint shall remain anonymous and confidential.

- (c) Following receipt of any complaint, Nexon shall report any potential incident of modern slavery to the Australian Federal Police, who are responsible for investigating suspected cases of modern slavery and can be contacted on 131 237. Staff and affiliates of Nexon may report straight to the Australian Federal Police should they so choose.

## 7. Breach of Policy

A breach of this policy by any staff or affiliate of Nexon may result in disciplinary action being taken, including termination of employment, engagement, or affiliation.

In the event there is a breach of this policy by:

- (a) Nexon – the company will implement the CAP in addressing any concerns of unethical, illegal or conduct that is in breach of this policy, that is brought to the company's attention. The company will also engage with any required professionals to ensure that any issues raised will be addressed effectively and efficiently.
- (b) a customer – the company will notify the customer of the alleged breach that has been brought to the company's attention. The customer must then provide evidence to the company's satisfaction that any alleged breach of this policy has been remedied, including the implementation of any CAP. In the event the company is not satisfied that a breach of this policy has been remedied, the company may stop providing services to the customer. Additionally, the company is at liberty to report breaches of any contravention of modern slavery legislation to any authorities in the country or jurisdiction in which it operates.
- (c) a supplier, partner, or affiliate - the company will notify the supplier, partner or affiliate of the alleged breach that has been brought to the company's attention. The supplier, partner or affiliate must then provide evidence to the company's satisfaction that any alleged breach of this policy has been remedied, including the implementation of any CAP. In the event the company is not satisfied that a breach of this policy has been remedied, the company may stop engaging with the supplier, partner, or affiliate. Additionally, the company is at liberty to report breaches of any contravention of modern slavery legislation to any authorities in the country or jurisdiction in which it operates.

## 8. Looking Forward

Nexon is enthusiastic in managing the risk associated with modern slavery issues and endeavours to continuously collaborate with its staff, customers and suppliers, partners, and affiliates in opening dialogue around this issue.

Activities undertaken by Nexon to manage these risks include but is not limited to:

- (a) Incorporating into existing governance activities to oversee and address any issues in relation to modern slavery;
- (b) engage with staff, customers and suppliers, partners, and affiliates in assessing activities which may potentially lead to breaches of modern slavery legislation and policies;



- (c) increase the supply of information and transparency in relation to the anti-slavery policies adopted by customers and suppliers, partners, and affiliates of Nexon;
- (d) continue to collaborate with industry partners to develop a program for early detection and prevention of any breach of modern slavery legislation and policies; and
- (e) increase transparency in respect of any non-conformances of anti-slavery legislation and policies.

A handwritten signature in black ink, appearing to read "Barry Assaf", written over a horizontal line.

Barry Assaf

CEO

Date 20/8/2021