

1 Modern Slavery and Purpose of Policy

At **Nexon Australia Pty Ltd ACN 095 335 023**, we unequivocally condemn all forms of modern slavery, recognising it as a grave violation of human rights and human dignity. We are steadfastly committed to the eradication of modern slavery within our operations and supply chains.

2 Responsibilities

This policy reflects our proactive approach to preventing modern slavery and outlines the measures we undertake to identify, assess, and mitigate associated risks. Through robust processes, due diligence, and collaboration with stakeholders, we aim to ensure that our business practices uphold the highest standards of integrity and respect for human rights.

3 Our Commitment

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) human trafficking;
- (b) slavery
- (c) servitude;
- (d) debt bondage;
- (e) deceptive recruiting;
- (f) forced labour;
- (g) forced marriage; and
- (h) the worst forms of child labour.

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The International Labour Organisation estimates that approximately 49.6 million people are living in modern slavery in 2021, of which 27.6 million were in forced labour.

Of the 27.6 million people in forced labour, it is estimated that 17.3 million are exploited in the private sector. Furthermore, the Asia and the Pacific Region has the highest number of people in forced labour (approx. 15.1 million).

The 2023 Global Slavery Index estimates that on any given day in 2021, there were 41,000 individuals living in modern slavery in Australia. This equates to a prevalence of 1.6 people in modern slavery for every thousand people in the country.

In light of the above, Nexon is committed to eliminating modern slavery in all its forms by ensuring its supply chains, operations, employment, and relationships do not contribute to, or perpetuate practices related to modern slavery,

This Policy supports the operation of the *Modern Slavery Act 2018 (Cth)* ('Act') under which Nexon is a reporting entity.

2 Responsibilities

To effectively address modern slavery risks, responsibilities within Nexon are clearly defined as follows:

- (a) The Board of Directors is responsible for the approval, and oversight of this Policy.
- (b) The Legal and Compliance teams will be primarily responsible for conducting the annual and ongoing reviews of this Modern Slavery Policy. They will assess its effectiveness, identify areas for improvement, ensure it meets Modern Slavery Act requirements, and provide recommendations to the Board and the CCSO to ensure the policy remains robust, relevant and aligned with the legal and ethical standard.

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- (c) The Chief Customer Services Officer (CCSO) is responsible for overseeing the implementation of this policy and ensuring its effectiveness and compliance. The CCSO is also responsible for monitoring performance, addressing any gaps, and reporting on the policy's outcomes to relevant stakeholders.
- (d) The Executive, including process/business heads, are responsible for setting a strong tone from the top, ensuring the organisation adheres to a zero-tolerance approach to modern slavery. Additionally, they are jointly responsible for policy compliance within their departments, extending to staff training, supplier monitoring and risk assessment.
- (e) All staff are expected to complete training on Modern Slavery to ensure a thorough understanding of this policy. All staff are expected to comply fully with its provisions and demonstrate the ability and commitment to identify and report any potential incidents of modern slavery in a timely and appropriate manner.

3 Our Commitment

By committing to minimising and addressing modern slavery risks across its supply chains and operations, Nexon prioritises operational activities including transparency, continual improvement, and collaboration. Nexon acknowledges its responsibility under the *Act* and is dedicated to publishing clear, actionable modern slavery statements that reflect our ongoing progress. Nexon is committed to ensure:

- (a) continual improvement in the management of modern slavery risks;
- (b) allocation of appropriate resources to ensure modern slavery risks are effectively minimised; and
- (c) continuous assessments of our efforts to mitigate the modern slavery risk Nexon's operations and supply chains.

4 Application and Scope of Policy

Nexon is a "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 reporting on:

- (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; and
- (d) education and training materials and programs to increase awareness of modern slavery risks in Nexon's supply chain.

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

5 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) **Corrective Action Plan (CAP)** is a structured response for addressing identified risks, ensuring issues are corrected, monitored, and prevented from recurring. It is further defined in 6.1(d).

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- (e) **Modern Slavery** is defined within the Act, with examples and statistics in 1. Modern Slavery and Purpose of Policy.
- (f) **Nexon** means Nexon Asia Pacific Pty Ltd ACN 095 335 023.
- (g) **Operations** means all activities undertaken by Nexon.
- (h) **Partner** means any person or organisation who is collaborating with Nexon or participating in any joint venture with or on behalf of Nexon.
- (i) **Policy** means this Modern Slavery Policy.
- (j) **Staff or Staff Member** means an employee of Nexon and includes casual employees.
- (k) **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.
- (l) **Supply Chain** means all products, goods or services that contribute to Nexon's provision of their products and services, including those sourced both in Australia and worldwide and extending beyond direct suppliers.

6 Statement of Intent

This Policy:

- (a) sets out Nexon's:
 - (i) commitment to ethical practices, respecting human rights and directly addressing modern slavery. This includes a commitment to fostering positive workplace interactions and a commitment to transparency and continuous improvement;
 - (ii) compliance framework for meeting reporting obligations set out in the Act 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.

7 Nexon's Approach to Limiting the Risk of Modern Slavery Practices

7.1 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 risk assessment strategies, due diligence procedures and a Corrective Action Plan to combat Modern Slavery.

Noting that suppliers and partners are particularly integral to Nexon's anti-slavery commitments, Nexon hopes suppliers continue to adhere to our Policy, any consider the implementation of similar standards across their supply chains. Nexon strongly encourages its business partners and affiliates to avoid using forced, bonded, or child labour and to instead ensure the freedom of movement and fair working conditions for all workers. Hence, Nexon also encourages those partners to establish accessible grievance channels for their workers to safely and confidentially report unethical practices.

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The following principles aid 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. Internally, Nexon identifies Modern Slavery risks thorough regular assessment, and employs safeguards in ways including but not limited to the following:

(i) implementing procedures and policies which address issues associated with modern slavery;

(ii) avoiding 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) establishing contractual terms with suppliers which include a requirement for them to comply with this Policy and/or establish their own anti-slavery policy, if appropriate, and evidence compliance with such policy at regular intervals;

(v) using best endeavours to exercise professional and ethical judgment at all times during their employment with Nexon;

(vi) treating all issues or concerns raised about modern slavery seriously, and with impartiality and sensitively;

(vii) if required of staff delegated with such duties, investigating allegations of modern slavery fairly and reasonably; and

(viii) applying 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. Where possible, Nexon implements screening procedures to align Suppliers' practices with its own. Desirable Suppliers and Partners engage in positive business practices, which may include, but are not limited to, the following:

(i) receiving Nexon-prescribed Modern Slavery Questionnaires, assessing risk factors including labour practices, compliance standards and grievance mechanisms;

(ii) satisfying an initial assessment by Nexon's Legal team with respect to responsible business practices and approaches to modern slavery. This assessment will apply to large scale suppliers where, internally or externally, potential modern slavery risks have been flagged, or where the commercial relationship is particularly large;

(iii) receiving Nexon-prescribed training modules on modern slavery prevention and ethical practices, with an intention to promote shared responsibility and capacity building;

(iv) demonstrating their commitment to identifying, assessing, and addressing modern slavery in their business operations and supply chains;

(v) not using any type of forced labour or bonded labour, and respecting the freedom of movement of all workers including the freedom to leave their employer after reasonable notice;

(vi) providing a safe and hygienic working environment, where workers receive adequate and regular training to perform their jobs in safe manner;

(vii) complying 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*);

(viii) keeping transparent and accurate records 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);

(ix) providing written and comprehensible information in respect of the worker's employment conditions, wages and standards of the workplace before such employment

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commences;

- (x) ensuring working hours imposed on the worker comply with the applicable law in the country or jurisdiction in which the supplier operates;
- (xi) prohibiting any discrimination 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;
- (xii) complying with relevant local and national environmental protection laws;
- (xiii) working collaboratively with Nexon to prevent, mitigate, and remedy modern slavery in their supply chains, and provide all information required by Nexon to gain an understanding of the measures in place to identify these risks; and
- (xiv) promptly notifying Nexon of any suspected or actual incident or modern slavery as soon after becoming aware of it.

(c) 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 has adopted the following procedure to be carried by its Compliance Team to ensure that any deficiencies in compliance with this Policy are addressed as a priority. The CAP is triggered in any instance of non-compliance, to prioritise rapid resolution, with input from relevant stakeholders to assess, mitigate and prevent recurrence:

- (i) provide 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 prevent 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 Nexon.

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(e) Mandatory Reporting

Nexon acknowledges that, by being a reporting entity under the Act, it is obliged to report and remediate on breaches of this Policy. It endeavours to do so, and:

(i) Commits to cooperative and investigative attempts with respect to alleged, potential and actual breaches.

(ii) Will pursue alternate avenues of reporting where relevant, including to international bodies or domestic institutions.

(iii) At all times remain compliant with minimum reporting requirements.

7.2 Reporting and Keeping of Records

Nexon will endeavour to maintain records to monitor policy effectiveness, including risk assessment findings. Additionally, Nexon will maintain records of supplier breaches where reported, by the supplier or otherwise, and relevant incidence response details. Statements will be lodged in accordance with the Act so as to be publicly accessible through the Modern Slavery Statements Register.

7.3 Reporting

(a) A key aspect of Nexon's modern slavery response is empowering our staff and affiliates to feel free and safe to report when there is unethical, illegal, corrupt or other inappropriate conduct.

(b) Reports can be made:

(i) to the Authorised Representative at corporate.compliance@corp.nexon.com.au as soon as reasonably practicable; or

(ii) in accordance with our Whistleblower Policy and Procedure.

(c) Nexon shall report any identified 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](tel:131237). Staff and affiliates of Nexon may report straight to the Australian Federal Police should they so choose.

7.4 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.

8 Metrics

Nexon's progress is measured against specific KPIs that reflect its commitment to effective Modern Slavery risk management. These include:

(a) An overarching commitment to the continuous improvement of our modern slavery response and efforts to achieve the goals set out in Annexure A to this Policy.

(b) Supplier engagement to ensure at least the top 20 suppliers of goods and services to Nexon will be sent Modern Slavery questionnaires annually. Nexon intends, where possible, to expand this practice in future financial years.

(c) Training regimes for all staff, including the provision of training materials to all employees within the company. Participation is strongly encouraged, and awareness of Modern Slavery is expected, with an intention to achieve completion rates of 90+ in future financial years.

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- (d) Annexure A may be amended from time-to-time and the details of such metrics are to be read in conjunction with the Modern Slavery Statement.
- (e) Future goals of:
 - (i) Supplier engagement expanding to top 50, and then all suppliers, receiving Modern Slavery Questionnaires annually, with periodic reviews.
 - (ii) Allocation and monitoring of all modern slavery training allocation to all staff and ensure we achieve higher completion rate – 95%.
 - (iii) Sustained periods of zero incidence and zero pending action items at year-end within each reporting cycle.
 - (iv) Conducting annual audits of high-risk suppliers, aiming for improved compliance standards with this Policy. 10 randomised leading suppliers will have their compliance verified annually through online research where possible and may receive a Questionnaire if required. Other diagnostic and auditing tools will continue to be used.
 - (v) Incorporating modern slavery clauses and compliance terms into 100% of written agreements with new suppliers, and into renewals of existing contracts.

9 Breach of Policy

Nexon considers any violation of this policy to be a serious matter and will address such breaches with the utmost gravity. 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 – Nexon will implement the CAP to address any concerns of unethical, illegal or conduct that is in breach of this Policy, that is brought to Nexon's attention. Nexon will also engage with any required professionals to ensure that any issues raised will be addressed effectively and efficiently. Complicit behaviour may result in internal disciplinary action in accordance with the Nexon's policies and procedures.
- (b) a customer – Nexon will notify the customer of the alleged breach that has been brought to the Nexon's attention. The customer must then provide evidence to Nexon's satisfaction that any alleged breach of this Policy has been remedied, including the implementation of any CAP. In the event Nexon is not satisfied that a breach of this Policy has been remedied, Nexon may stop providing services to the customer. Additionally, Nexon 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 – Nexon will notify the supplier, partner or affiliate of the alleged breach that has been brought to the Nexon's attention. The supplier, partner or affiliate must then provide evidence to Nexon's satisfaction that any alleged breach of this Policy has been remedied, including the implementation of any CAP. Nexon will require and assist suppliers, partners or affiliates to remedy breaches in the first instance. In the event Nexon is not satisfied that a breach of this Policy has been remedied, Nexon may stop engaging with the supplier, partner, or affiliate, by way of termination. Additionally, Nexon 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. In such circumstances, Nexon may involve its own legal team to verify or assess the impact of the incident, from which it may draw its own conclusions on supplier compliance, and act accordingly as outlined above.

Per the Modern Slavery Guidance for reporting entities, Nexon will report suspected situations of Modern Slavery to the Australian Federal Police. Where it is believed someone is at risk of immediate harm, Nexon will contact Triple Zero (000) per the Guidance.

Signed 
Barry Assaf
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Barry Assaf
Chief Executive Officer, Nexon Asia Pacific
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Impact areas	KPI	Target
Suppliers, partners and contractors	Questionnaire sent to top 20 suppliers.	100%
Clients	Ensure Modern Slavery risks are identified and mitigated throughout the engagement.	Depending upon the engagement, risks to be identified for each issue raised by the client during the engagement process.
Staff including contractors	All staff allocated Modern Slavery awareness module training. Overdue modules to be followed up on.	100%
New risks	All allegations, concerns of or queries about Modern Slavery to be investigated or reviewed.	Zero pending action items.
Organisation wide	No Modern Slavery incidences to occur within Nexon.	Zero instances of Modern Slavery.
Organisation wide	Action for any Modern Slavery instance to occur within Nexon or at suppliers/partners/contractors.	Review the risk, apply the CAP and take due action.