



Nexon Asia Pacific Pty Ltd Modern Slavery Statement FY24

Message from the CEO

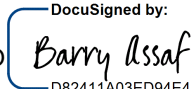
I am pleased to present the fourth consecutive modern slavery statement of Nexon Asia Pacific Pty Ltd, ACN 095 335 023 ('Nexon'). This modern slavery statement covers the reporting period of 1 July 2023 to 30 June 2024 ('FY24'), provides insight into the modern slavery and human trafficking risk profile in our operations and supply chains, and the actions that we have taken as a company to best identify and mitigate such risks, as much as possible.

Nexon continues its commitment to supporting and respecting human rights, including the eradication of all contemporary forms of slavery. We take our obligations to assess and manage modern slavery risks seriously throughout our business practices, and we continue our collaborative efforts with staff, customers, suppliers, partners, and affiliates in open dialogue around the issue. In 2019, we positioned improving our people's general health and well-being, as well as community engagement, as being critical to our corporate social responsibility frame. We have endeavoured to maintain that commitment through the implementation of culturally diverse and inclusive programs. We survey our people to develop informed strategies for improvement and foster meaningful connections and experiences company wide. We continue to prioritise these endeavours, which align with our corporate values and purpose and provide a solid foundation upon which to develop our human rights and modern slavery response.

This reporting period follows the 2023 independent review ('Review') of the Modern Slavery Act 2018 (Cth) ('Act'). The Review, although concluding 'the Act had not resulted in any meaningful change for people affected by modern slavery,' made 30 key recommendations. Those recommendations endeavour to spark a major cultural change and a strengthening commitment to work and collaborate harder to combat modern slavery. Nexon also welcomes the inaugural Australian Anti-Slavery Commissioner, announced on November 11, to begin on December 2, 2024; this marks a concrete step toward redress and accountability nationwide. I have witnessed this cultural step change occurred within our business, and more broadly across the industry. Together with our technology partners, we are in the early phases of a long journey in which embedding anti-slavery measures within our supply chains and business operations, to establish a rights-based working environment as the norm.

After several years of rapid growth stemming from several key acquisitions, FY24 has been a year of consolidation, growth and development for Nexon. Similarly, our approach to modern slavery risks has continued to grow and has been consolidated over the financial year. This includes improvements to our governance framework, such as reporting guidelines and training modules, with a keen emphasis on building capability and knowledge around modern slavery in the business. Nexon has actively sought to enhance our grievance mechanisms and improved our approach to due diligence procedures and continues to collaborate internally and industry-wide to better assess our effectiveness against Board approved, tangible, Modern Slavery Metrics.

This modern slavery statement is to be read in conjunction with our Modern Slavery Policy (the 'Policy') which remains a key element of our maturing modern slavery governance framework. I hope the actions Nexon has taken to identify, analyse and mitigate modern slavery risk in our operations and supply chain present an illuminating view of a key issue that is affecting businesses and society, and better provide understanding of modern slavery and our responsibility to mitigate its impact on the lives of the most vulnerable in our global society.

Signature of Barry Assaf, CEO 
Date 16/12/2024

This statement was approved by the Board of Directors of Cirrus Holdings 1 Pty Ltd (ACN 632 829 906), which has 100% effective interest in the Nexon Asia Pacific Pty Ltd and is signed on behalf of the Board by the Responsible Member noted immediately above.



FY24 in review

Area	Actions Completed During Reporting Period	Page(s)
Improved the Governance Framework	<ul style="list-style-type: none"> ● Reviewed Modern Slavery Policy and associated Modern Slavery Metrics ● Revised Code of Conduct ● Expanded modern slavery practices to offshore staff ● Maintained commitment to strategic initiatives and frameworks to support and embed delivery of ESG initiatives organisation-wide 	
Built Capability	<ul style="list-style-type: none"> ● Continued modern slavery training programs to onboarded staff through the New Starters Compliance Training Module ● Administered modern slavery awareness training allocated to all staff, including contractors, as at 30 June 2024 ● Continued provision of general compliance training, at regular intervals, to all employees and contractors, including modern slavery education, Workplace Health & Safety, Anti-Discrimination and Harassment and Anti-Bullying 	
Enhanced grievance mechanisms	<ul style="list-style-type: none"> ● Updated Whistleblower Policy and Procedure, including access to independent ethics and integrity hotline ● Reviewed internal Managing Workplace Grievances Policy 	
Improved Due diligence	<ul style="list-style-type: none"> ● Conducted desktop due diligence on suppliers with an identified elevated level of modern slavery risk ● Conducted a review of current workforce to assess any potential indicators of modern slavery risk ● Improved recruitment and retention practices domestically and offshore 	
Boosted collaboration	<ul style="list-style-type: none"> ● Engaged independent modern slavery experts to assist with modern slavery analysis and reporting ● Used Go1 training software to rollout group-wide education modules ● As part of our commitment to a set of strategic initiatives and frameworks to support and embed delivery of ESG: <ul style="list-style-type: none"> ○ Engaged Schieder Electric to compile a Green House Gas inventory ○ Established a Diversity, Equity, Inclusion and Belonging Committee ○ Achieved Reflect Reconciliation Action Program endorsement from Reconciliation Australia and Nexon is now a RAP member. 	



Area	Actions Completed During Reporting Period	Page(s)
	<ul style="list-style-type: none"> ○ Focused on inclusive procurement approaches, including an Indigenous Procurement Policy to actively support community growth. 	
<p>Assessed effectiveness of our actions</p>	<ul style="list-style-type: none"> ● Analysed and reviewed metrics against baseline to inform performance levels and future actions as required under our Modern Slavery Policy and associated Modern Slavery Metrics ● Conducted a policy review of the legislature to identify recent amendments and highlight capacity to improve our response ● Conducted a gap analysis against our FY23 Modern Slavery Statement and comprehensively reviewed our Modern Slavery Policy and associated Modern Slavery Metrics in alignment with the Act 	

About Nexon



Founded in 2000



Industry Leader



1500+ clients



~600 employees



8 offices across Australia



Award Winning Technology Partner



Providing end-to-end digital solutions across Government, NFP, financial professional services and retail



45+ accreditations and certifications

Nexon is an award-winning digital consulting and managed services partner for mid-market, enterprise and government organisations across Australia. We have a uniquely broad suite of solutions to service clients who require end-to-end capabilities coupled with specialist expertise in security, cloud, and digital solutions.

Our end-to-end solutions continue to help clients solve problems, address frictions, and accelerate growth. Nexon remains committed to the highest standards of responsiveness, competency, and transparency, and is built on a unique client care model that is fuelled by continuous feedback. With nearly 600 staff, we employ some of the country’s most experienced consultants, to inform business practices and empower teams to make decisions that accelerate change for client organisations.

As a certified and accredited local, state and federal government provider, CREST, and ISO-certified, Nexon partners with world-class technology vendors to deliver innovative solutions and service excellence.



We help our clients move from a position of stagnation or concern to empowerment, looking forward to a more agile and digital future.

Our services extend to include:

Advisory

As an end-to-end provider, we deliver clear strategic direction by defining pragmatic and actionable roadmaps across our client’s tech-stack.

Project Implementation

We invest time into understanding our client’s organisation to align our delivery methods with their expectations and needs at all levels: technology, organisational, user, and change management.

Managed Services

We deliver a much more strategic, long-term solution delivered by proven specialists in Security, Networks, Cloud, Unified Communications and Digital Solutions.

Nexon Partner Program

The Nexon Partner Program targets managed service providers, system integrators, Internet service providers, unique software vendors and consultants as resellers of Nexon’s digital services product offering to their clients. The Partner Program empowers these partners to scale and add variety to their existing service portfolio. They can facilitate more comprehensive solutions to their client’s problems while retaining control of the offering and the client relationship. We also offer our partners a serviced data centre solution built on reliable infrastructure and years of experience which reduces the drain on their financial assets and operational resources to build an enterprise owned solution.

Our Technology Partners

Over the past 20 years, we have continuously reviewed and formed strategic relationships with relevant technology vendors and carriers to ensure our clients’ IT environment reflects changing business environments. Nexon is committed to remaining “agnostic” and maintaining diverse partners to ensure optimal client outcomes.

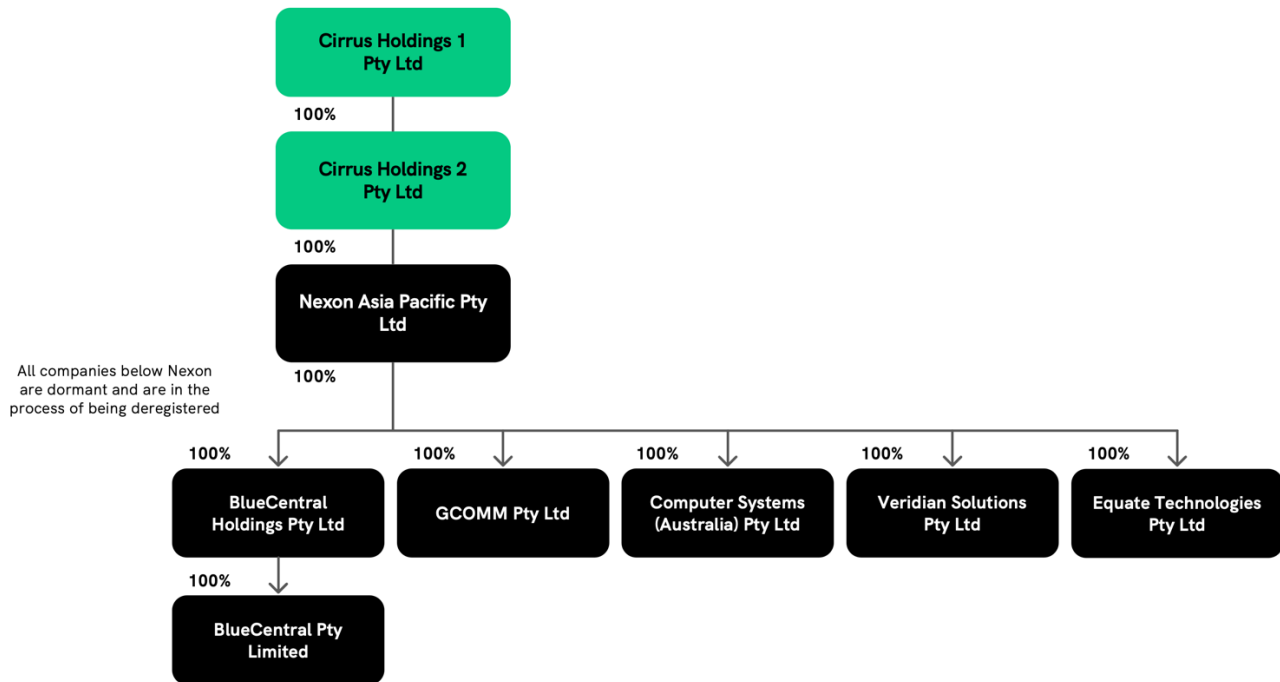
Some of our technology partners:





Corporate Structure

During FY24, the Nexon Group comprised of the following entities:



Recently Acquired Entities

The Nexon Group constitutes several wholly owned subsidiaries as outlined above. Some of those entities operate under the brands CSA, Equate and Veridian.



Nexon is currently completing the final steps to consolidate all three entities, including integrating the operations and customer bases to ensure consistent operation across the corporate group. In FY24, a concerted effort was made to novate legacy contracts from CSA, Equate and Veridian to Nexon, and invoicing and other businesses procedures have reflected that effort. Over the next reporting period, Nexon anticipates it will have consolidated all entities under the Nexon brand.

Nexon is reporting on a consolidated basis on behalf of our wholly owned subsidiaries for this modern slavery statement and will outline the steps taking to ensure our holistic and consistent approach across our group.



Nexon Values

Invested: Our clients remain central to our business practices. We are invested in building a brighter and more secure future for our clients to drive better outcomes. With a focus on long-term partnering, we look carefully at our client's unique situation to find the best solution for their organisation.

Happy: Our service model and business practices are built on capturing our clients' happiness. We care about delivering service excellence and better outcomes that drive our clients forward. We inspire a culture of resourceful, accountable behaviours that ensures every Nexon person goes the extra mile to help clients succeed.

Passionate: We love what we do and are determined to deliver on our promises through our positive actions. We never let setbacks deter us from our client's ideal vision - we constantly pursue our client's goals - fuelled by a passion for technology and what we do.

Integrity: We work with integrity, fostering a culture of open, honest communication and trust internally, and with our clients, setting high standards for our behaviour and doing right by our clients in every interaction.

Empowered: We are empowered to innovate and drive change for both our clients and our business. This means being responsive to change and driving projects forward, but never losing sight of the bigger picture, because in short, we care.

Environmental, Social and Governance ('ESG') Initiatives

We believe ESG plays a critical role in our corporate strategy. Appropriately addressing ESG initiatives drives a brighter, more sustainable and resilient future for our customers, partners, community and planet. Human and labour rights are integral to our approach to ESG.

Technology driven efficiency

In FY23 Nexon invested significantly in underpinning ESG initiatives with technology and processes to ensure all metrics are measurable and reported accurately and in a regular cadence. FY24 has witnessed continued momentum in that regard.

Nexon's recently established Inventory Management Plan, in conjunction with the Resource Advisor platform, continue to contribute to a quarterly process for data collection enabling inventory-based emissions calculations and transparency.

Key strategic priorities across the ESG portfolio for Nexon for FY24 and beyond include:

- **Environment– Running on 100% Renewable Energy**

Nexon remains committed to the strategic goals and objectives around the 2030 target and continue to engage Schneider Electric with respect to a Green House Gas inventory, assisting in defining and formalising the way we measure and report on our carbon footprint.

Key environmental initiatives include:

- Transitioning the vehicle fleet to electric vehicles by 2030
- Achieving environmental accreditation by 2030
- Enabling 100% renewable energy / Green Power by 2023 – Achieved
- Reviewing supplier sustainability accreditation in procurement of goods and services



- Reducing the packaging and materials consumed by Nexon and its partners / suppliers

- **Social** – Setting the standard for re-assured delivery

Nexon’s commitment to the highest standards and accreditations to support and impact operations underpins our outstanding service provision and offers the reassurance our customers demand in the delivery of consistently high-quality outcomes.

Across the Nexon group, we maintain our commitment to the creation and rollout of policies, procedures and accountabilities across ISO Standards (ICT), Occupational Health and Safety (OH&S), Environmental Management, Customer Privacy, Data Security, Diversity, Equity and Inclusion (DE&I).

Key social initiatives include:

- In FY24 establishing a Diversity, Equity, Inclusion and Belonging Committee focused on key areas of strategic importance.
- Achieved Reflect Reconciliation Action Program endorsement from Reconciliation Australia and Nexon is now a RAP member.
- Focusing on inclusive procurement approaches, including an Indigenous Procurement Policy to actively support community growth.
- Partnering with ‘For Purpose’ clients and supporting several charitable organisations aligned to our values and culture. These include children and youth, mental health, social poverty and domestic issues and neurological, cancer and healthcare causes.

- **Governance** – Applying a risk-based approach to protects our people, customers and community

As situational and environmental factors evolve at pace, pro-actively pre-empting and understanding the challenges facing organisations, people and communities is a fundamental tenet of the Nexon strategy. Establishing a robust portfolio of policies, processes and procedures is essential to the safe and successful operation of the organisation. It also underpins the successful implementation of strategic goals and tactics and supports the Nexon mission in creating a sustainable future for their people, customers and community. Accordingly, human and labour rights are a critical and integral component of our policies and procedures.

Our People

Type	Number of staff as of December 4, 2024
Full-time and full-time equivalent	438
Part-time	18
Fixed-Term	9
Casual	20
Total Employees	485 (includes fixed contracts)
Independent contractors	110
Total Workforce	595



Of Nexon's 485 direct employees, all 485 are in Australia and work across 8 offices in the states of New South Wales, Victoria, Queensland and South Australia.

Of Nexon's 110 contractors, 21 are located in Australia and 89 work offshore in Sri Lanka (28), India (21), the Philippines (35) and Serbia (5). The use of offshore contracted labour has been identified as having an elevated level of modern slavery risk due to the reduction in the level of oversight of labour-based suppliers. This is compounded by the high instances of outsourcing of certain functions in the IT industry to jurisdictions with reduced regulatory measures. The use of migrant labour and the prominence of recruitment agencies increases the vulnerability of this workforce. Cognisant of this risk, we have performed supplier assessments on all labour hire companies with whom we work to vet for such risks and check credentials.

Nexon's workforce is organised into the following business units:

- Technology Office – Strategy Transformation & ICT
- Finance
- People Experience
- Advisory
- Sales
- Customer Services including Operations

Nexon manages its workforce in accordance with the robust legislation and regulatory framework that Australia provides in relation to employment rights and human rights. Nexon is required to maintain best practices, systems and policies that support our staff as part of the relevant legislative framework within Australia.

The vast majority of our staff are educated professionals and require specific qualifications, usually at a tertiary level and at least some experience in our industry in order to work for Nexon. This makes our workforce less vulnerable to exploitation. However, understanding that the IT industry overall is susceptible to significant modern slavery risk in the form of contracted, subcontracted or outsourced labour, we are still committed to undertaking regular reviews of our people outlined below under 'Identifying risks of modern slavery.'

Our Supply Chains

Nexon primarily operates in the broader IT industry and thus relies upon the supply of IT software and hardware for our operations. Whilst Nexon does not sell products in the traditional sense, we provide clients with hardware and software solutions as part of our service offering. As part of this service offering, Nexon also engages with suppliers operating in IT-related services including the provision of remote technical support, telecommunications, and servers for cloud storage/computing.

The hardware that we procure are primarily from Australian-based technology resellers, but the production of such goods and the sourcing of components and inputs are primarily from overseas markets, with a significant proportion of IT technology being manufactured in Asia, notably China, Taiwan and Malaysia. The suppliers from whom we source these hardware solutions are large multinational corporations that are able to ensure supply of the necessary hardware that we require.

Identifying the risks of modern slavery

Nexon conducted an enhanced due diligence exercise for this reporting period to identify the potential areas of modern slavery risk in our operations and supply chains.



Operations

Nexon's operations are primarily based in Australia and as such are therefore subject to robust labour laws and regulations. The need to comply with the standards provided by legislation and regulation provide greater certainty that our staff are not being exploited. Beyond this, the nature of our personnel as highly trained and educated individuals further lowers the potential risk of modern slavery.

Further, Nexon endeavours to maintain a high standard of quality in our operations to achieve and maintain our ISO certifications as well as our approval status with the governments of the various states and territories in Australia. A critical aspect of these certifications is the fulfilment of specific criteria, including having competent and qualified staff to provide safe, secure and quality service to our clients.

Our commitment is reflected through our actions and is continuously maintained in line with ISO9001, 14001, 27001 and 45001 for quality, environment, information security and occupational health and safety management system standards, respectively that are managed within our Integrated management System (IMS). This commitment is also demonstrated through our corporate objectives.

Nexon's recruitment and retention practices provide a robust means of employee onboarding and ensures that the rights of our people are upheld. Since 1 September 2022, all employees are required to return satisfactory police check prior to commencing employment. All employees and contractors of Nexon are also required to complete compliance training, which includes Modern Slavery, Bullying and Discrimination content.

Nexon largely provides its services through direct employees who are subject to the labour laws of Australia. This is supplemented through some contracted labour that is reviewed and vetted by our team to ensure that they are upheld to our standards. All contractors are required to have appropriate qualifications, which are vetted prior to engagement as well as independent insurances.

The use of contracted labour to perform remote IT-related services is a common feature in our industry. As addressed above, contracted labour in remote locations carries an inherent risk of poor transparency and oversight of the working conditions faced by such contracted labour on a daily basis. The IT industry also has a further risk associated with its significant recruitment of migrant workers. The recruitment of migrant workers generally carries the risk of deceptive recruitment and the imposition of recruitment fees, possibly leading to debt bondage, increased worker vulnerability and reduced freedom of choice.

The highly skilled and trained nature of our workforce decreases Nexon's modern slavery risk exposure in our direct operations, but we endeavoured to take proactive measures to further mitigate modern slavery risk factors as detailed under "FY24 Actions to address modern slavery risk."

Supply Chains

Upon review, Nexon has identified the predominant sources of modern slavery risk in our supply chain being derived from the IT hardware, services and the provision of supplementary labour to our workforce (addressed above).

Beyond the review and analysis of the industries of Nexon's key suppliers, Nexon once again undertook a desktop due diligence exercise of our top 20 suppliers, in terms of spend amount, for each of the four key Nexon Group brands, being Nexon, Veridian, CSA and Equate. As per last year, in FY24 we also sent out modern slavery questionnaires or alternatively, have obtained and considered modern slavery statements from our most prominent suppliers to further understand and inform our risk assessment of the key suppliers we deal with.

With respect to overall due diligence, we also:



- continually monitor media alerts about suppliers, which can identify potential modern slavery compliance issues; and
- aim to ensure the entities in our supply chain comply with our modern slavery policies by including modern slavery clauses in contracts with vendors where the products or services may pose a modern slavery risk.

Nexon is working towards systematically improving our contracts with suppliers to ensure modern slavery risks are addressed, with goals for contractual inclusion for all new suppliers henceforth.

IT Hardware

As noted in previous years' statements, IT hardware presents an elevated level of modern slavery risk due to the nature of the components that comprise the devices that we source for our clients. Our direct suppliers of IT hardware are at a low risk as they operate in jurisdictions with added protections for labour. Rather, the risk is incurred deeper in the further tiers of our supply chain, often at the raw material level where less of our spend is reflected and our leverage is minimal.

To address the risks, Nexon consciously sources from well-established technology resellers in Australia who have taken proactive steps to mitigate their modern slavery risk as noted in of their own modern slavery statement and as such, have more transparent supply chains. These resellers source the hardware we use from large multinational companies that have also undertaken steps to better address modern slavery in their supply chains by instituting conflict mineral policies and responsible procurement policies, among other forms of mitigating actions. The suppliers from whom Nexon sources from present robust governance and are reporting entities under the Act or similar laws or regulations in other jurisdictions.

Due diligence conducted on key suppliers in our IT hardware supply chain demonstrates that suppliers are taking a proactive approach to modern slavery risk and have statements relating to the procurement of conflict minerals.

E-waste

The disposal of electronic waste (e-waste) is notoriously difficult to track, however research and reporting has linked e-waste items from Australia to offshore waste facilities where child labour and hazardous work conditions are prevalent. Across all our Nexon sites we only use reputable Australian-based suppliers, the majority of whom are required to assess and mitigate the risks of modern slavery in their supply chain and produce Modern Slavery Statements under the Act.

IT Software and Services

Software

In terms of software, these products are often developed by highly trained and educated individuals in jurisdictions with relatively robust labour laws such as the US and Australia. These products have not been identified as a source of elevated risk given the skilled and educated workforce required to produce such products. Our direct suppliers operating in this industry have also demonstrated actions to mitigate their modern slavery risk as detailed in under "Top 20" illustrating a relatively low risk of modern slavery occurring.

Services

Service based industries are identified in the ILO's Global Estimates of Modern Slavery as being the most prevalent business sector for forced labour exploitation, consisting of an estimated 32% of total forced labour.



Nexon procures IT related services in the form of data centres, servers and cloud-based services. The use of outsourced labour in providing these technical services may be at higher risk of exploitation given the lack of visibility over the working conditions of such workers and the prevalence of these service providers in higher risk regions such as India and other Southeast Asian countries. These suppliers also largely source their own IT hardware which is exposed to the risks outlined above.

However, the nature of the industries in which our suppliers operate requires technical expertise and training in the relevant processes of the IT systems. The required skills and training of the workforce operates to reduce the risk of labour exploitation when compared to other service industries.

Branded goods and ad hoc purchases

Nexon will often procure promotional or marketing goods – such as t-shirts, hats, and pens – for use by individuals and teams. Such goods can be mass-produced at low cost, and where appropriate due diligence on the vendors is not completed there is a potential for poor labour practices that are not visible to us. This risk is heightened when such goods are sourced from countries identified as high-risk of modern slavery and produced by workers from vulnerable backgrounds. Nexon's risk is mitigated substantially by the fact we source from two reputable long-term suppliers who have robust modern slavery policies and procedures.

FY24 actions to address modern slavery risks

Nexon's modern slavery response is informed by the UN Guiding Principles of Business and Human rights. We understand that due diligence is an ongoing process – one which is most effective when it is embedded in the risk and procurement functions of our business. To this end, Nexon continues to focus its efforts on refining its governance framework, improving grievance mechanisms and embedding due diligence.

Improved the governance framework

Reviewed Modern Slavery Policy

FY24 marked a substantial periodic review of our Modern Slavery Policy, spanning several months of cross-checking and research, which was ultimately approved by the Board together with the Modern Slavery Metrics in December 2024. Our Modern Slavery policy is a key governance document that outlines the commitments of Nexon to assess and address modern slavery risks in our operations and our supply chains. The Policy is informed by experts and based on internationally recognised principles on business and human rights. The Policy sets out the high standards of care that Nexon expects from our personnel as well as the entities and people with whom we partner with. Nexon leant on its legal team to additionally advise and draft responses to modern slavery to promote compliance and accountability.

This Policy is published externally on our website and internally uploaded on our intranet site and made available to Nexon staff during onboarding.

Revised Code of Conduct

Nexon's Code of Conduct sets out the standards of behaviour that is expected from our staff and is underpinned by Nexon's values and the principles of integrity and respect. Directors, employees, contractors and third parties acting on behalf of Nexon must confirm they are aware of and comply with the Code and any breach of the Code may lead to disciplinary measures taken by Nexon. Key components of the Code require that Nexon personnel must act with trust, honesty, confidentiality and be respectful of differences among colleagues. The Code also prohibits the harassment, bullying, intimidation and dishonesty in the course of their employment.



In March 2023 Nexon published a revised version of its Code of Conduct. In 2024 we have continually reviewed that document to align with Nexon's corporate values and expectations of its staff.

ESG Strategic Initiatives and Frameworks

As aforementioned, Nexon has committed to a set of strategic initiatives and frameworks to support and embed the delivery of ESG initiatives across the organisation.

At an organisational level, the team has demonstrated an impressive track record in delivering against its commitments in three key areas, already achieving and exceeding goals 12 months before the anticipated timeframe.

Key strategic priorities across the ESG portfolio for Nexon Asia Pacific include:

- Environment – operating and servicing clients through sustainable efficiency
- Social – setting the standard through accreditations to provide re-assured delivery
- Governance – embedding policies, procedures and processes to measure sustainable impact

For instance, we have already achieved our 2023 target of enabling 100% renewable energy / Green Power by 2023.

Built Capability

Extended modern slavery training pilot to all onboarded staff

A key step in ensuring that modern slavery risk is minimised and mitigated is empowering our personnel with the knowledge to readily identify modern slavery risks or conditions which are conducive to modern slavery practices if unchecked. Nexon has partnered with corporate training company, Go1, to provide our staff with robust yet concise training modules of modern slavery. The education program includes online training modules addressing awareness of modern slavery, modern slavery risks in operations and supply chains, supplier engagement and remediation action.

In the most recent reporting period, we successfully managed to extend the moderns slavery training pilot program to all onboarded staff as part of the New Starters Compliance Training Module. Nexon anticipates in future financial years to approach 100% completion of such modules.

Implemented company-wide rollout of modern slavery awareness training

In conjunction with the expansion of the pilot training revered to above, we also rolled out company-wide modern slavery awareness training to all employees and contractors and have witnessed high completion rates company-wide.

Regular compliance training of a general nature

Modern slavery education now also forms part of Nexon's annual mandatory compliance requirements for all employees and contractors, in addition to Workplace Health & Safety, Anti-Discrimination and Harassment and Anti-Bullying. Our people can also access non-mandatory training as required using the GO1 platform. This builds capability and interest within the field of modern slavery.

Enhanced Grievance Mechanisms

Human rights grievance mechanisms such as our Whistleblower Policy and Procedure and Workplace Grievance Policy forms an integral element of our modern slavery response and ensures improvement in



process and practice. For example, Nexon's Whistleblower Policy sets out the framework by which any relevant individuals can report any behaviour which is contrary to our standards and expectations. Our Managing Workplace Grievance Policy sets out an internal framework to promote timely and transparent resolution of concerns about behaviour or the decisions of others. These policies are reviewed regularly and updated as necessary to ensure best practice and alignment with our business practices.

Improved due diligence

Steps were taken to improve our understanding of the modern slavery risks of key supplier by:

- Issuing questionnaires and seeking co-operation and feedback from those suppliers. This will expand to include contractual arrangements with respect to modern slavery, and periodic, randomised reviews of non-top 10 suppliers.
- Conducting desk top risk assessments in addition to seeking direct feedback (for example, reviewing supplier's modern slavery statements, conducting topical news searches, etc.).

In the reporting year we also:

- Reviewed our workforce to assess any potential indicators of modern slavery risk.
- Improved recruitment and retention practices.

Boosted Collaboration

In creating this modern slavery statement and revising the Policy, Nexon has consulted with experts in the modern slavery space to better understand our modern slavery risk profile and the steps that we can undertake to mitigate such risks.

Nexon is committed to developing and maintaining a unified process to modern slavery across our group and recognise that our controlled entities have an integral role in ensuring a consistent, group-wide approach to modern slavery.

Once again, we undertook consultation with our controlled entities through meetings of our executive team and board, engaging with key personnel across our business units to generate a holistic understanding of our risk profile.

To promote consistency across the business Nexon has utilised Go1 to provide all our personnel with access to training on our policies, procedures and this statement to ensure that our approach to modern slavery is widely shared. This year we also established a Corporate Social Responsibility Committee to improve how we engage across the business and give back to our community, as well as joining forced to build a safer and more inclusive workplace environment.

As part of our commitment to a set of strategic initiatives and frameworks to support and embed delivery of ESG, we also boosted collaboration in the following areas:

- Engaged Schieder Electric to compile a Green House Gas inventory to assist in defining and formalising the way we measure and report on our carbon footprint.
- Established a Diversity, Equity, Inclusion and Belonging Committee focused on key areas of strategic importance.
- Achieved Reflect Reconciliation Action Program endorsement from Reconciliation Australia and Nexon is now a RAP member.



- Focused on inclusive procurement approaches, including an Indigenous Procurement Policy to actively support community growth.

Assessed effectiveness of our actions

Nexon is committed to continuing to improve our approach to addressing modern slavery risks in our operations and supply chains.

Our Modern Slavery Policy is reviewed and approved by the Board on an annual basis, with the most recent version being affirmed in December 2024. This Policy identifies several key Modern Slavery Metrics to determine the effectiveness of modern slavery measures.

In this reporting period the following metrics were assessed and the effectiveness of our actions evaluated as follows:

Impact areas	KPI	Target	FY24 Results
Suppliers, partners and contractors	Questionnaire sent to top 20 suppliers.	100%	100%
Clients	Ensure modern slavery risks are identified and mitigated during the engagement.	Depending on the engagement, risks to be identified for each issue raised by the client during the engagement process.	Appropriate actions were taken in a situational capacity.
Staff, including contractors	Staff allocated modern slavery awareness module training, with follow-up for overdue completion.	100%	100%
New risks	Any modern slavery issues communicated must be actioned.	Zero pending action items.	Zero
Organisation wide	No modern slavery instance to occur within Nexon or at suppliers / partners / contractors.	Zero modern slavery instance.	Zero
Organisation wide	Action for any modern slavery instance to occur within Nexon or at suppliers / partners / contractors.	Review the risk and take action on the relevant parties involved.	N/A

Additionally, in the reporting period, our Whistleblower hotline, both internally and externally managed, received no reports related to modern slavery and/or potential indicators of modern slavery. Zero reports were made related to general labour conditions. This represents the maintenance of no reports from the previous reporting period. As per our Modern Slavery Policy, we record any breaches of the policy by our



staff or an affiliate of Nexon. In the event of a breach, we will implement a CAP and notify customers, suppliers, partners or affiliates of the potential breach and procure evidence that the breach has remedied. In FY24, we recorded zero breaches of the Modern Slavery Policy.

Future Steps

Although our modern slavery risk profile is relatively low, modern slavery remains a significant issue requiring ongoing due diligence. Nexon is committed to ongoing improvement and the further minimisation of modern slavery risk in our operations and supply chains.

To achieve better outcomes in the next reporting period, Nexon will undertake to pursue the following actions in each relevant area:

Area	Actions	Estimated Completion
Improving the Governance Framework	<ul style="list-style-type: none"> • Embed compliance into our supplier contracts (e.g., develop and implement responsible supply terms) for all new suppliers • Develop supplier Code of Conduct • Encourage supplier compliance and review of Nexon's Questionnaires and policies • Introduce modern slavery addendums to existing contracts where possible 	FY25/26
Building Capability	<ul style="list-style-type: none"> • Deliver face-to-face training for procurement staff to aid in identifying, assessing and responding to modern slavery risks • Promote completion of modules towards 100% 	FY25
Enhancing grievance mechanisms	<ul style="list-style-type: none"> • Review grievance mechanisms, including the Whistleblower Policy and Managing Workplace Grievances Policy • Revise and implement remediation measures when modern slavery is found 	FY25
Improving Due diligence	<ul style="list-style-type: none"> • Consider business case for reputable ethical sourcing tool / desktop third party information bureau to improve risk assessments and due diligence 	FY25
Boosting collaboration	<ul style="list-style-type: none"> • Work collaboratively with industry peers to better inform business practices • Engage partners and suppliers in open dialogues on the importance of modern slavery management and risk aversion 	FY25/26