



TRITIUM

Modern Slavery Policy

Policy

POL.1974

Version 1

10 January 2022

Revision Record

Rev	Date	TC #	Change	Author
1	3/12/2021 10/01/22	3144	First Draft CEO review	R Walsh, HR Director J Hunter, CEO

Contents

1	Purpose	3
2	Definitions	3
3	Scope	4
4	Responsibilities	4
5	Policy	4
	5.1 Supply Chain	4
	5.2 Operations	5
	5.3 Reporting	5
	5.4 Breaches of this Policy	5
6	Contacts	5
7	Review of policy	5

1 Purpose

This policy affirms Tritium's commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.

This Policy also supports the intent of international conventions, treaties, and protocols relevant to combatting modern slavery and the *Modern Slavery Act* (Cth) 2018.

Tritium commits to contribute to ending all forms of modern slavery, both in Australia and overseas, by ensuring our own supply chains and operations don't contribute to modern slavery practices.

This document is directed to assisting Tritium to comply with its obligations under the Modern Slavery Act and reducing the modern slavery risks posed to its business and its supply chain.

2 Definitions

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom.

Modern slavery is defined by the *Modern Slavery Act* (Cth) 2018 to include eight types of serious exploitation and which include:

1. **Trafficking in persons**, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery, or practices similar to slavery, servitude or the removal of organs.
2. **Slavery**, which is where the offender exercises powers of ownership over the victim.
3. **Servitude** which is where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work.
4. **Forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work.
5. **Forced marriage**, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
6. **Debt bondage**, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
7. **The worst forms of child labour**, which involves situations where children are exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work, which may harm their health or safety, or used to produce or traffic drugs.
8. **Deceptive recruiting for labour or services**, which is where the victim is deceived about whether they will be exploited through a type of modern slavery.

It can also extend to:

- Entering a commercial transaction involving a slave
- Exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading.
- Conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it).

3 Scope

This Modern Slavery Policy (Policy) applies to all directors, officers, and employees (collectively, you) of Tritium. This Policy should also be read in conjunction with the Tritium Code of Conduct which serves as a guide for how to conduct yourself as a part of the Tritium business.

It is critical that you comply with the obligations set out in this document. Modern slavery can cause significant harm to the individuals affected and there are significant reputational, financial, market and operational risks for Tritium if Modern slavery practices in Tritium's operations or supply chain are not detected and addressed.

This document sets out important information as to the steps that Tritium will take in response to identifying a Modern slavery risk. You must familiarise yourself with this document to assist Tritium in effectively carrying out its duties in compliance with the *Modern Slavery Act*.

4 Responsibilities

Role	Responsibility
General Counsel and Company Secretary	Responsible for the administration and maintenance of this Policy.
All managers	Tritium's managers are responsible for ensuring their direct reports are provided communications and training opportunities to enhance their understanding of the causes and humanitarian impact of modern slavery, the Modern Slavery Policy and Tritium's approach to limiting the risk of modern slavery within our supply chains and operations.
All employees	All employees must comply with this policy so far as it is relevant to their role.

5 Policy

Tritium will work proactively to reduce modern slavery within our supply chains and operations, and we expect all organisations we engage with to do the same.

5.1 Supply Chain

We expect all existing and new Tritium suppliers to operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed. Suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event Suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk.

Suppliers must notify Tritium as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

Tritium's contractual terms reflect supplier obligations in relation to compliance with Australian modern slavery laws and those foreign modern slavery laws that apply in the location(s) in which they operate.

5.2 Operations

Tritium maintains a Modern Slavery Policy (this Policy) outlining our approach to reducing the risk of modern slavery practices within our supply chains and operations. The Policy provides guidance on the steps Tritium takes to work with suppliers to reduce risks and the range of supports available for when a Tritium person becomes aware that someone is at risk of, or affected by, modern slavery practices.

We are committed to ensuring the health, safety and wellbeing of our workforce and we maintain a suite of policies that are informed by and compliant with Australian workplace and occupational health and safety law.

We ensure that any volunteers or unpaid students or interns are engaged on a truly voluntary and non-exploitative basis.

5.3 Reporting

A key part of supporting ethical standards is enabling Tritium employees, suppliers, and partners to feel free and safe to speak up when there are reasonable grounds to suspect that Tritium or Tritium's suppliers or partners are not acting in accordance with laws and obligations.

Concerns about compliance or illegal activities are to be reported in accordance with the Tritium Whistleblower Policy. Complaints will be kept confidential and will be dealt with appropriately. You will not experience retribution or retaliation for a complaint made in good faith.

If you believe that a breach of this Policy has occurred or is likely to occur, you must notify your manager and the General Counsel or the Whistleblower Investigations Officer as soon as possible. For further details please refer to Tritium's Whistle Blowing Policy (POL.034).

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of a Tritium supply chain constitutes any of the various forms of Modern slavery, your query should be raised with your manager and the General Counsel.

5.4 Breaches of this Policy

Tritium may terminate its relationship with individuals, partners and suppliers working on its behalf or engaged by it, if they breach this Policy.

6 Contacts

General Counsel & Company Secretary:

Mark Anning

Phone: +61 438 079 037

Email: manning@tritium.com.au

Other Disclosure Officers:

Dougald Coulson [Whistleblower Investigations Officer]

Senior Lawyer

Phone: +61 7 3147 8500

Email: dcoulson@tritium.com.au

7 Review of policy

This policy is reviewed and updated regularly in accordance with [PRO.019 Documentation Continuous Review Process](#).