



Modern Slavery Policy Tactical Global Management

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Document Control

Version History

Date	Version	Comments
1/07/2020	1.0	New policy developed following introduction of <i>Modern Slavery Act 2018</i> – effective from 2019.
21/01/2022	2.0	Annual policy review

Policy Owner: Chief Financial Officer, maintained by Director Human Resources

Policy Approver: Chief Executive Officer

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1 INTRODUCTION

Tactical Global Management Limited (TGM) is committed to ensuring its reputation is upheld as a good corporate citizen. Clients trust TGM to behave ethically and comply with the law. This approach is reinforced via the Company's Code of Ethical Conduct.

The purpose of this policy is to limit the risk of modern slavery occurring within TGM, its supply chain, investors or any other business relationship. It is also to demonstrate TGM's ongoing commitment to doing business with those that fully comply with the Commonwealth Modern Slavery Act 2018 (The Act). It applies to all TGM employees and will be made available via the TGM Staff Portal.

2 DEFINITION

Modern Slavery is a serious violation of an individual's dignity and human rights. Exploitative practices including human trafficking, slavery, servitude, forced labour, debt bondage and forced marriage are all considered modern slavery and are serious crimes in Australia.

The Commonwealth Modern Slavery Act 2018 commenced operation on 1 January 2019, creating reporting obligations for entities in the Australian market that have annual consolidated revenue of at least \$100 million.

TGM is not bound by the annual reporting requirements of the Modern Slavery Act, however, it shares the collective responsibility to continually review its operations, investors and supply chains and will voluntarily provide a link to its Modern Slavery Statement on the TGM website to reinforce compliance with the Act.

3 IDENTIFYING AND MANAGING THE RISKS OF MODERN SLAVERY

TGM will identify and manage the risks of modern slavery by conducting thorough risk assessments to identify the risks of modern slavery occurring in its operations, investors and supply chains and set out the steps being taken to address/mitigate the risks. This process will be managed via the TGM Risk Register and the Company's CRS Certus Questionnaire. TGM also conducts new supplier Modern Slavery compliance checks and annual due diligence checks on its suppliers/service providers via the distribution of its Modern Slavery Questionnaire. The Questionnaire, introduced in 2021, also contains a 'Principals for Suppliers' Acknowledgement that integrates human rights risk management into the front end of TGM's supplier engagement process. Once the results of the Questionnaire are collated, they are reviewed for compliance with the Modern Slavery Act. If any heightened modern slavery risks are identified, TGM will communicate the risks to the supplier and identify corrective action that can be taken within an agreed timeframe as part of a remediation plan. The Chief Financial Officer is accountable for the coordination of the ongoing risk assessment and due diligence ensuring that employees, contractors, suppliers and investors understand their modern slavery obligations and the business's expectations of them.

4 REPORTING PROCESS

At TGM there are two reporting avenues available should an employee, director or contractor suspect an instance of modern slavery whether it be in the operations, investors or supply chain of the business. The reporting options are as follows:

- Making a complaint in writing to the Director HR, Director Compliance and Operations or the Chief Executive Officer, or
- Making a complaint in accordance with TGM's Whistleblower Protection Policy.

The Chief Financial Officer in consultation with the Director HR and the Director Compliance & Operations has overall responsibility for ensuring this policy complies with TGM's legal and ethical obligations and that all employees, directors, contractors and suppliers of TGM comply with it.

TGM is committed to complying with the laws that protect the rights of individuals who raise compliance concerns. Employees are encouraged to advise management if they suspect modern slavery activity in TGM's operations, investors or supply chains. Management can then act quickly to investigate and take the appropriate action.

5 COMMUNICATION AND TRAINING

The Modern Slavery Policy will be maintained by the Director HR, overseen by the Chief Financial Officer and endorsed by the TGM Audit and Risk Committee. The Chair of the Audit and Risk Committee will provide updates to the Board of Directors on issues that are raised, the way that they are dealt with and the overall effectiveness of the TGM Modern Slavery Policy.

Employees will receive Modern Slavery Policy training as part of their TGM induction/onboarding process. The Policy and future updates will be tabled at TGM All Staff Meetings.

The Policy will be available to all staff via the TGM Intranet and should be read in conjunction with TGM's related policies including:

- The Code of Ethical Conduct;
- Whistleblower Protection Policy;
- Compliance Policy Handbook,
- Equal Employment Opportunity, Harassment and Workplace Bullying Policy, and
- Vendor Management Policy

Any questions regarding the Modern Slavery Policy should be referred to the Director HR or the Chief Financial Officer.

6 MONITORING AND REVIEW

The Modern Slavery Policy will be overseen by the Chief Financial Officer, maintained by the Director HR and endorsed by the TGM Audit and Risk Committee. The Chair of the Audit and Risk Committee will provide updates to the Board of Directors on issues that are raised, the way that they are dealt with and the overall effectiveness of the TGM Modern Slavery Policy.



Stephen Goode
Chief Executive Officer



Lesley Rinaudo
Director Human Resources