

XFRAME®

Modern Day Slavery Policy

Australia/New Zealand Region | Revised July 2026



XFrame Modern Day Slavery Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

XFrame is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

XFrame expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with its core values.

1.0 Policy Statement

We are committed to acting ethically and with integrity in our business dealings and relationships and are committed to preventing modern slavery in our own business and to helping prevent modern slavery in our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery. In line with the Modern Slavery Act 2018[1], we are outlining the steps we take to tackle modern slavery. We expect the same high standards from all our employees and suppliers.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, contractors, consultants and any other third-party representative.

Definitions of Criminal Activities – All forms of criminal activities as defined in the Act, are prohibited at XFrame. These include:

Slavery: where ownership is exercised over an individual

Servitude: involves the obligation to provide service imposed by coercion

Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty

Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Child labour: involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development

2.0 Responsibility

The Directors have overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations and that all those under our control comply with it.

The Executive Management team have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries regarding the policy and auditing internal procedures.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

3.0 Compliance

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Any activity that might lead to, or suggest, a breach of this policy must be avoided.

Where appropriate, the Company will engage directly with suppliers in respect of this policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.

Employees must notify a manager (or a main point of contact at XFrame, if a supplier) as soon as possible if it is believed or suspected that a breach of this policy has occurred or may occur in the future.

All parties are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business, or supply chains or any supplier tier, at the earliest possible stage.

If unsure about whether a particular act, the

treatment of workers more generally, or their working conditions within any tier of our supply chain constitute any of the various forms of modern slavery, employees should raise this with a manager (or your main point of contact at XFrame, if a supplier).

XFrame aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment by XFrame as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If any parties believe that they have suffered any such treatment, they should inform the Chief Executive Officer immediately. If the matter is not remedied, employees should raise it formally through the Company's grievance procedure.

4.0 Communication and Awareness

Guidance on this policy forms part of the induction process for all employees and is included in our HR Policy Manual and provided otherwise as necessary.

We are committed to continuous improvement so that our processes and interventions remain effective in preventing and remediating modern slavery.

5.0 Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working for us or on our behalf (including suppliers) if they breach this policy.

[1] Modern Slavery Act 2018: <https://www.legislation.gov.au/Details/C2018A00153>

Policy authorised by:



Carsten Dethlefsen | Managing Director

XFrame Ltd (ABN: 92 639 792 546)

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