

AFT PHARMACEUTICALS LIMITED

(AFT Pharmaceuticals)

Modern Slavery Policy

1. General

AFT Pharmaceuticals supports the protection of human rights and is committed to ensuring that business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. It is vital for us to maintain this reputation as it instils confidence in our workforce and customers.

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

2. Purpose of this Policy

The purpose of this Policy is to ensure that AFT Pharmaceuticals:

- complies with all applicable national, local and other applicable laws and regulations;
- addresses modern slavery risks within its supply chain and business operations; and
- sets minimum standards for employees and those who work on our behalf with respect to the identification of any modern slavery risks

It is vital that employees and those who work on our behalf understand their responsibilities and operate to high ethical standards and comply with all laws and regulations wherever AFT Pharmaceuticals does business.

This Policy applies to all directors, officers, employees, contractors, secondees, agents and intermediaries (including those engaged through third party agencies) of AFT Pharmaceuticals and any of its subsidiaries (each a **“Relevant Person”**). This Policy provides principles and certain specific rules regarding modern slavery. However, as AFT Pharmaceuticals is a multinational company operating in various jurisdictions, this Policy may be supplemented with specific guidance relevant to a local jurisdiction’s operations provided that such local supplement does not in any way undermine the scope, intent and application of this Policy. If any dispute is raised with respect to specific rules under this Policy and a localised policy, the terms of this Policy prevail unless the local policy has been approved by the board of directors of AFT Pharmaceuticals (the **“Board”**).

If you do not understand any part of this Policy, or how it applies to you, you should raise the matter with your manager and the CFO or the CEO for guidance.

3. Defining Modern Slavery

Modern slavery is an umbrella term for several serious exploitative work practices that represent violations of human rights. Modern slavery can take many forms and under the Australian Modern Slavery Act 2018 (Cth) (**“MSA”**) modern slavery includes the following types of serious exploitation: trafficking in persons, slavery and slavery like practices such as servitude, forced labour, forced

marriage, the sale and exploitation of children, deceptive or misleading recruitment for labour or services and debt bondage.

4. Prohibition on Modern Slavery

AFT Pharmaceuticals will not tolerate any form of Modern Slavery in its operations or supply chain. AFT Pharmaceuticals' policies and procedures aim to ensure that it is addressing Modern Slavery and ethical sourcing risks in its operations and supply chains in a way that is appropriate.

In engaging third-party suppliers and distributors, contractors and consultants (together, a "counterparty"), employees should seek to make compliance with this Policy part of the relevant contractual obligations. The contract should also seek to include provisions relating to the counterparty's compliance with any Modern Slavery laws and regulations that may apply and that AFT Pharmaceuticals has the capacity to cease all dealings with the counterparty in the event that the counterparty breaches any applicable Modern Slavery law or regulation.

5. Compliance and Monitoring

Policy compliance requirements are critical to ensuring that AFT Pharmaceuticals and all Relevant Persons and third parties understand this Policy and comply with its terms. AFT Pharmaceuticals is committed to regular auditing and monitoring of its business and the conduct of its third parties to promote compliance with this Policy.

Under the MSA, AFT Pharmaceuticals is required to make an annual public report on the actions of its business to address modern slavery risks in its operations and supply chains.

6. Non-Compliance

Contraventions or non-compliance with this Policy, including attempts to circumvent this Policy by bypassing or knowingly manipulating the process, system, or data which records AFT Pharmaceuticals' transactions will be the subject of an investigation by AFT Pharmaceuticals and may result in disciplinary action, up to and including termination, consistent with local laws.

Matters may also be referred to relevant law enforcement agencies.

7. Reporting Violations

You are required to report conduct which you may reasonably believe involves a suspected or actual violation of this Policy. The report may be made to your manager or the Board as appropriate or otherwise in accordance with AFT Pharmaceuticals' Whistleblowing Policy.

In making a report of a suspected or actual violation of this Policy, you will not suffer any form of retaliation, reprisal or detriment from AFT Pharmaceuticals for raising a concern or reporting in a violation (or suspected violation) of this Policy.

8. Review

This Policy is subject to regular review by the Board.

Last updated: **April 2022**

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