

## Modern Slavery Policy

### Purpose

**Sphere Commodities Group Pte Ltd and its affiliated companies (“the Sphere Group”)** is committed to ensuring that modern slavery and human trafficking have no place in our operations or supply chains. This policy outlines our approach to identifying, preventing, and addressing modern slavery risks in compliance with applicable laws in Australia, particularly the Modern Slavery Act 2018 (Cth), and the Philippines, under relevant labour and anti-trafficking laws, including the Anti-Trafficking in Persons Act of 2003 (RA 9208, as amended by RA 10364).

### Scope

This policy applies to all employees, contractors, suppliers, and business partners engaged by the Company, in both Australia and the Philippines. It addresses our legal and ethical responsibilities to prevent modern slavery and promote ethical labour practices across all levels of our operations.

### What is Modern Slavery?

Modern slavery involves situations of exploitation where individuals cannot refuse or leave work due to coercion, threats, or deception. It includes:

- Human trafficking
- Forced or bonded labour
- Child labour
- Slavery and servitude
- Debt bondage
- Deceptive recruitment practices

### Our Commitment

The Sphere Group is committed to:

- **Compliance:** Adhering to the Modern Slavery Act 2018 (Cth) in Australia and the Anti-Trafficking in Persons Act in the Philippines, along with other applicable local laws.
- **Risk Assessment:** Identifying and mitigating risks of modern slavery in our operations and supply chains.
- **Supplier Engagement:** Working closely with suppliers and contractors to ensure compliance with ethical labour standards.
- **Training and Awareness:** Providing education and resources to employees and stakeholders on modern slavery issues.
- **Transparency:** Regularly reporting on our efforts to address modern slavery risks, including through an annual Modern Slavery Statement in Australia.

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### Legal Framework

#### Australia

Modern Slavery Act 2018 (Cth): Requires entities with consolidated revenue of \$100 million or more to publish annual statements detailing efforts to address modern slavery risks.

#### Philippines

Anti-Trafficking in Persons Act of 2003 (RA 9208, as amended by RA 10364): Criminalizes trafficking and related practices, with provisions for victim protection and rehabilitation.

Labour Code of the Philippines: Protects workers' rights and prohibits forced labour and child labour.

### Responsibilities

#### Management

- Ensure compliance with modern slavery laws in both jurisdictions.
- Conduct risk assessments and implement policies to address identified risks.
- Foster a culture of ethical practices within the organization.

#### Employees

- Comply with this policy and related procedures.
- Report any suspected incidents of modern slavery.

#### Suppliers and Contractors

- Adhere to the Company's Supplier Code of Conduct, which prohibits modern slavery.
- Implement ethical practices and demonstrate compliance with local and international standards.

### Risk Management and Due Diligence

#### Risk Assessment

The Company will:

- Conduct regular assessments of its operations and supply chains to identify areas at high risk for modern slavery.
- Focus on industries, locations, or practices that are more prone to exploitation.

#### Supplier Engagement

The Sphere Group will:

- Require suppliers to provide evidence of compliance with anti-slavery practices.
- Include modern slavery clauses in contracts, ensuring clear expectations.

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- Audit suppliers, particularly in high-risk areas like manufacturing, recruitment, and agricultural supply chains.

## Training and Awareness

The Sphere Group will provide training programs tailored to employees and contractors in both jurisdictions to:

- Recognize modern slavery risks.
- Understand reporting mechanisms and their roles in prevention.
- Promote ethical practices within the workplace and supply chains.

## Reporting and Addressing Concerns

Employees, contractors, and suppliers are encouraged to report suspected instances of modern slavery or unethical labour practices. Reports can be made through:

- A confidential reporting channel (e.g., hotline, email).
- Direct communication with Directors or Senior Management.

Reports can be made through the following channels:

- Email: [reporting@sphere.ph](mailto:reporting@sphere.ph)
- Online Reporting Portal: [www.sphere.ph/reporting](http://www.sphere.ph/reporting)
- In Writing: [### sphere group address]

Reports will be investigated promptly, confidentially, and fairly, with protections in place for whistleblowers under relevant laws in both Australia and the Philippines.

## Transparency and Reporting

In compliance with the Modern Slavery Act 2018 (Cth), the Company will publish an annual Modern Slavery Statement outlining our efforts to address and mitigate modern slavery risks.

The statement will detail risk assessments, mitigation strategies, and outcomes.

In the Philippines, compliance will be aligned with local reporting requirements, including collaboration with government agencies on anti-trafficking efforts.

## Review and Continuous Improvement

This policy will be reviewed annually to ensure it remains effective and compliant with evolving laws and best practices in both jurisdictions.

For questions or further clarification about this policy, please contact:

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Approved by Director:

Sphere Commodities Group Pte Ltd



## **Modern Slavery Policy**

**Approved by the Board**

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