

Modern Slavery Policy

Purpose:	To set out TSA Riley's commitment to identifying, assessing, and addressing modern slavery risks in accordance with applicable laws, including but not limited to the Modern Slavery Act 2018 (Cth), the Modern Slavery Act 2015 (UK), and other relevant international frameworks.
Applicable to:	TSA Management Group Holdings Pty Ltd and its affiliated corporate entities (TSA Riley).
Region(s):	Group (all Staff)

Definitions

Term	Definition
Modern Slavery	Modern slavery refers to situations of exploitation in which a person cannot refuse or leave due to threats, violence, coercion, deception, or abuse of power. It is an umbrella term encompassing practices such as forced labour, human trafficking, debt bondage, forced marriage, and other slavery-like practices, all of which involve the removal of a person's freedom for personal or financial gain.
Staff	Board members, employees, casual employees, independent contractors, subconsultants and volunteers of TSA Riley Group.
Supplier	Any organisation or individual that provides goods or services to TSA Riley.

Policy

TSA Riley is committed to operating with integrity and in an ethical manner, working to prevent modern slavery and human trafficking in all aspects of its business operations and global supply chains. The organisation has zero tolerance for modern slavery and is committed to ensuring that:

- Its operations and business relationships are free from modern slavery; and
- It will take reasonable and proportionate steps to prevent, detect, and respond to modern slavery risks.

Ethical Employment Practices

TSA Riley is committed to:

- Ensuring employment is freely chosen and child labour is not used.
- Providing employees with clear written information about their employment or engagement conditions and wages before they commence their employment or engagement.
- Conducting checks on individuals' right to work before employing or engaging them.
- Paying individuals wages and benefits that meet or exceed applicable legal minimum standards, and where possible support fair and equitable remuneration practices.
- Providing safe and hygienic working conditions and taking reasonable steps to protect the health, safety and wellbeing of persons in its working environment.
- Promptly addressing any indications of modern slavery within its operations and supply chain as required.

Supply Chain Management

TSA Riley expects its Suppliers to:

- Comply with applicable modern slavery laws.
- Implement controls to prevent modern slavery in their operations.
- Cascade these requirements through their own supply chains.
- Complete modern slavery questionnaires or declarations, provide evidence of their practices, participate in audits or assessments where higher risk is identified.

TSA Riley will:

- Integrate modern slavery considerations into procurement processes.
- Assess suppliers based on risk (industry, geography, labour model).
- Require contractual commitments, where appropriate.

Risk Assessment, Reporting and Awareness

TSA Riley will:

- Identify, assess, and manage modern slavery risks across operations and supply chains through risk-based due diligence.
- Provide reporting mechanisms, investigate concerns, and implement corrective and remediation actions.
- Build organisational capability through training, awareness, and ethical business practices.
- Monitor the effectiveness of its modern slavery controls and continuously improve its approach where required.

Governance, Responsibility and Reporting

- The Chief Executive Officer oversees the implementation of this Policy.
- All Staff are responsible for complying with this Policy and reporting any concerns.
- Management is accountable for embedding appropriate controls within their areas of responsibility.
- TSA Riley encourages Staff and third parties to raise concerns relating to modern slavery via the Whistleblowing Policy or approved reporting channels. Reports will be treated confidentially and without retaliation.

This Policy will be periodically reviewed to ensure continued suitability.

Name Andrew Tompson
Position Chief Executive Officer
Date 1st July 2026
Signature

