



MODERN SLAVERY STATEMENT 2019

This statement covers the activities of Nova Aerospace Pty Ltd ABN 11 090 818 214 to understand and implement actions to minimise the risk of modern slavery and human trafficking in our operations and supply chain.

Introduction

This is the first Modern Slavery Statement for Nova Aerospace Pty Ltd ABN 11 090 818 214 (Nova) for the purposes of the *Modern Slavery Act 2008* (Cth).

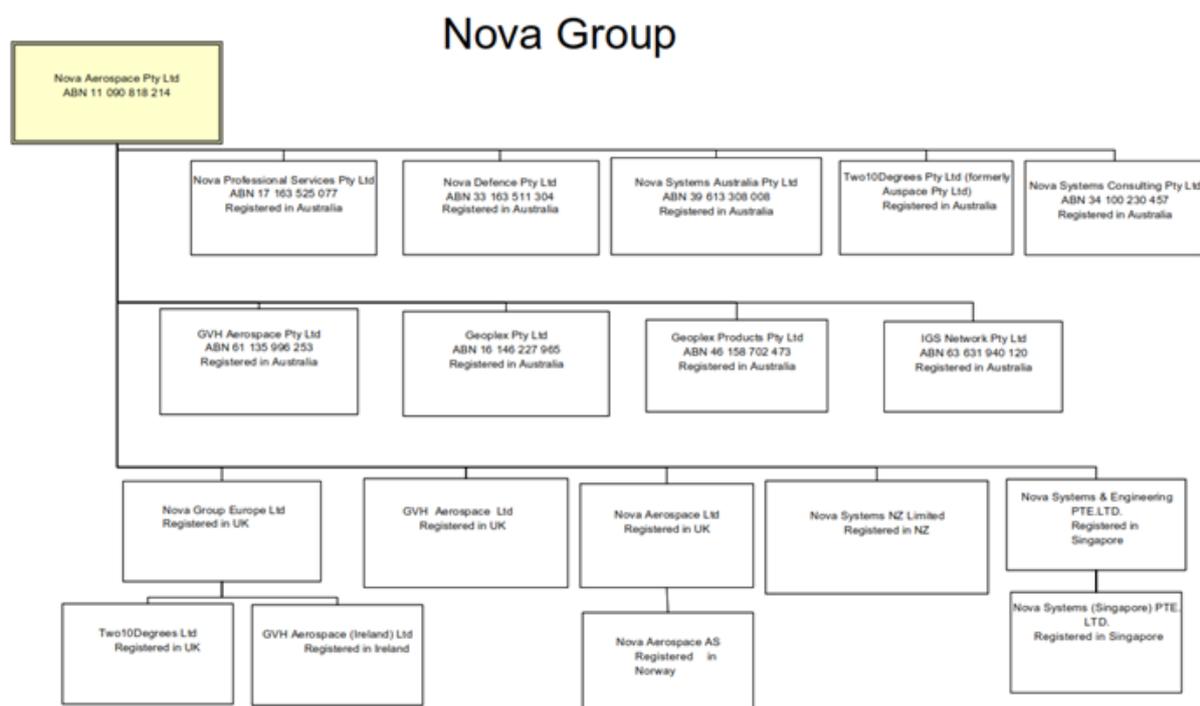
Nova is proud to be one of the leading professional services firms in Australia and overseas. Our talented people and strong workplace culture and values are integral to our success. We understand the importance of respecting and improving human rights as fundamental to how we deliver for our customers, our employees and the broader community.

We have a robust policy suite in place that promotes ethical and legally compliant business conduct through governance such as the Nova Code of Conduct and Open Door Philosophy, and integrated reporting mechanisms. Our policies reflect our dedication to prevent Nova's business practices contributing to violations of human rights such as modern forms of slavery. This is one aspect of Nova's commitment to corporate social responsibility, which includes: sustainability and the environment, equity and diversity, and is embodied in various long-established initiatives, such as Nova's philanthropic function and our IDEAL (Inclusion, Diversity, Equality, Action and Leadership) Committee.

Nova seeks to do business with suppliers that share similar values, ethics and sustainable business practices, including those related to human rights. Nova recognises that as a responsible corporate citizen its business conduct, and also the performance of its suppliers, has a significant impact on the wellbeing of the communities in which it operates.

Nova's Structure, Operations and Supply Chains

Founded in 2000 in Adelaide, South Australia, Nova Aerospace Pty Ltd is a private company incorporated in Australia. It is the ultimate parent company of the Nova Group of companies depicted below, with approximately 650 direct employees across the group.



Nova is primarily a professional services firm, currently operating offices across Australia, New Zealand, Singapore, the United Kingdom, Norway, and Ireland. Operational management decisions for Group businesses outside of the ANZ region are made by the boards of Nova subsidiaries of each relevant jurisdiction. Nova's business operations are predominantly conducted through five business streams:

- Nova Systems – various professional services including engineering, safety and management consulting
- GVH – provision of aviation design services and aviation products
- Two10degrees – provision of software as a service asset and lone/remote worker remote monitoring/management services and related services
- Geoplex – provision of geospatial consulting services, software development and configuration, sale of 3rd party software applications, product development / sales (including COTS software integration)
- Nova IGS Network – satellite ground monitoring services

Nova has a global supply chain consisting of hundreds of contracted suppliers, with supplier relationships in areas including ICT Services & Equipment, Property Services, Logistics, Consulting,

Aviation Equipment Manufacturing, Aviation Engineering Services, Marketing & Promotional Goods, Office Suppliers and Corporate Clothing.

We selectively pursue relationships with suppliers that share our values in respect of ethics, social responsibility and sustainability. The nature of each supplier's industry, and the territory they operate from, is a relevant consideration in this regard, and Nova expects its personnel to assess these factors when making purchasing decisions.

Risks of Modern Slavery Associated with Nova

Slavery in the present day is as inhumane, pernicious, and prevalent as ever. The sad reality is that forced labour, and related practices, has the potential to intersect with the operations or supply chains of most businesses – Nova included.

Predominantly a professional services firm, Nova's business faces a low risk of modern slavery. Nova's procurement of products and services, both for internal consumption and on-selling to customers, is the most likely source of modern slavery risks.

The primary areas of Nova business that risk contact with modern slavery are the supply chains of ICT and office equipment. As an innovative, technologically orientated organisation, Nova utilises reasonably large volumes of ICT equipment and services to support its business offerings. Certain business streams, such as two10degrees, also resell ICT hardware in conjunction with proprietary ICT services.

By reviewing its practices, making this public statement, and engaging on these risks with our suppliers, Nova supports the efforts of government, responsible corporate entities, and the wider community in seeking to eradicate modern slavery.

Actions taken by Nova to Address Modern Slavery Risks

Nova is taking a proactive approach to minimise the risk of modern slavery risk encroaching into our supply chain. This corporate commitment is led by the Nova board and supported by its related companies and the broader Nova community.

Over the 2019 reporting period, Nova's mitigation actions have included:

- Identifying and examining the Modern Slavery Statements of Nova's partners and major suppliers. This has demonstrated a high level of understanding and action against modern slavery on the part of Nova's core supply chain.
- Incorporating appropriate anti-slavery provisions in standard contracts where Nova engages consultancy services and subcontract services.
- Nova conducting a risk assessment of its Australian operations, the operations of its foreign entities, and core partners and suppliers. This assessment took into consideration risk factors such as the sector, industry, types of products and services, geographic locations and business models. While this assessment concluded that Nova's business practices present a low risk of any involvement with modern slavery, Nova intends to further mitigate the risk by implementing a program of awareness amongst Nova employees and contractors. Nova will periodically re-assess this risk and put additional measures in place as required.

Nova will strive to continuously refine its strategy to tackle risks associated with modern strategy. Our efforts over the next reporting period will include:

- Renewing our organisational risk assessment;
- Reviewing and updating as required governance control measures;
- Maintaining supplier and partner engagement on this issue;
- Provision of further information for Nova employees; and
- Developing an updated Statement on Modern Slavery.

Risk Mitigation Assessment

Modern slavery risks have been included as a standalone entry on Nova's organisational risk register. This step ensures periodic review of this type of risk as part of Nova's systematic global risk management procedures, and clear visibility by Nova's officers and senior management. Risk profile variations and enhanced mitigation measures are captured as part of this process.

The results of scheduled risk register reviews are reported to the board of Nova.

Nova Group Consultation Process

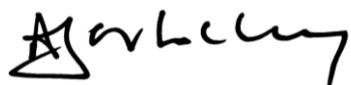
Nova has prepared this statement with input from centralised corporate support functions responsible for supporting all group entities, including Group Commercial & Legal, Group HR and Group Finance. In addition, detailed consultation has taken place with Nova's global executive leadership team and regional subcontractor procurement functions.

Nova Group Pledge

Nova has a proud history of improving the communities in which it operates, and we recognise there is more to do. We are committed to the ongoing delivery of our initiatives and partnering with our suppliers and partners to help eradicate modern slavery.

This statement was approved by the principal governing body of Nova, the Board of Directors of Nova Aerospace Pty Ltd, on 22 October 2020.

Signed,



Alan James Whalley
Chairman Nova Group