Modern slavery is a term used to describe situations where coercion, threats or deception are used to seriously exploit victims and undermine or deprive them of their freedom. This includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

In preparing this Statement, we recognise that substandard working conditions or the underpayment of workers are practices which left unaddressed, may escalate into modern slavery. We do not tolerate modern slavery in any of its forms as part of our commitment to corporate responsibility.

Thales Values & Modern Slavery

The Thales values help shape our organisational culture and our approach to modern slavery mitigation.

Customer trust
To succeed, we must work as partners with our customers, listening to them, anticipating their needs and finding solutions together. Building customer trust is always our priority. This equally applies to a joint effort to address the issue of modern slavery.

One Team, One Thales
We share responsibilities in a culture of loyalty, partnership and transparency and look to our colleagues both locally and abroad when assessing and addressing our risks. Collaboration and unity in our actions allows us to leverage the knowledge and insights that come from being a global organisation.

Developing our people
Supporting the professional development of each employee is fundamental and this includes the promotion of awareness, understanding of modern slavery risks. Dialogue is encouraged and we provide opportunities to promote open conversations about the actions we are taking.

Accountable and committed to excellence
We understand that acting responsibly means making realistic commitments and delivering on our promises. We strive to achieve excellence by acting with integrity, accountability and professionalism in everything we do.

Agile and innovative
We aim to continually improve quality and work more efficiently. We understand the importance of having strong foundations in place that enable us to demonstrate our commitment to these principles as well as social responsibility.
This is Thales Australia’s second statement under the Modern Slavery Act. It outlines the progress we have made throughout 2021 and re-examines our approach and commitment to identifying, assessing and addressing the risk of modern slavery within our operations and supply chain.

As a global organisation, and trusted technology partner, we recognise our critical role and responsibilities in eliminating modern slavery and advancing human rights. We strongly oppose modern slavery in all its forms, and are deeply committed to ensuring our organisation and supply chain operates with integrity and without exploitative practices.

The Thales global purpose is building a future we can all trust. We live this purpose in not only the solutions we offer, but the way we do business, the people we employ and those we partner with. A trusted future is one founded on integrity, transparency, honesty, sustainability and free from exploitation.

In the past year, our focus has been multilayered; each effort aimed at enhancing vigilance and preventing the actualisation of modern slavery. We built awareness of modern slavery risks within our organisation and developed a sustainable approach to continuous improvement. We reviewed and refined our processes to ensure we’re continuously and consistently operating in an ethical way. We worked to expedite payments times during the ongoing COVID-19 pandemic to alleviate financial stressors which may contribute to modern slavery. You can read more about our key highlights on page 6.

While we have made significant progress and improvements in preventing the actualisation of modern slavery risks, we remain committed to evolving our measures to meet these challenges.
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## Acknowledgement of Country

Thales Australia acknowledges that our sites and facilities sit on the ancestral lands of Aboriginal and Torres Strait Islander peoples. We pay our respect to the past, present and future Traditional Custodians and Elders of this nation and the continuation of cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander peoples.
This is the 2021 Modern Slavery Statement (‘Statement’) for Thales Australia Limited ACN 008 642 751 (‘Thales Australia’) prepared in accordance with the requirements of the Commonwealth Modern Slavery Act 2018 (‘the Act’). It outlines the steps we have taken during the reporting year ending 31 December 2021 to detect, assess, and mitigate the risk of modern slavery practices within our operations and our supply chain.

Thales Australia is a subsidiary of Thales Australia Holdings Pty Limited (ACN 058 583 841) (Parent Company). The Parent Company is ultimately owned by Thales SA. Thales SA is a French société anonyme (joint-stock company), identified with number 552 059 024. Other than Thales Australia, no other entity of the Parent Company meets the reporting entity criteria under the Act and is not covered by this Statement.

References to ‘us’, ‘our’ and ‘we’ in this Statement are references to Thales Australia. We refer to Thales SA as ‘Thales Group’ or ‘Group’ in this Statement.

Identification of the reporting entity

This Statement for the reporting year ending 31 December 2021 is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth). It was approved by the Board of Directors of Thales Australia Limited on 30 June 2022.

The process of consultation involved a working group made up of representatives from various parts of the reporting entity’s business who are involved in the detection and prevention of modern slavery across our operations and supply chain.

Prior to review and approval by the Board, the Statement was reviewed by members of Thales Australia’s executive leadership team including our Chief Executive Officer, Chief Compliance Officer, Chief Operations Officer, VP Human Resources, VP Strategy, VP Sales and Key Account Management, VP Technical and Engineering, Chief Financial Officer, and VP Operational Safety.
Key achievements

Throughout 2021, we continued to embed our approach to managing the risk of modern slavery risk across our operations and supply chain.

- Thales Australia published its first Modern Slavery Statement
- Reviewed and updated the process for engaging with third parties to identify new categories of purchasing risk
- Created a dedicated page on our intranet to provide information about the measures we have in place to manage modern slavery risks
- Conducted targeted modern slavery training for members of our procurement teams to assist in identifying risk factors
- Expedited payment times to alleviate cash flow issues during the COVID-19 pandemic
- Delivered targeted ethics and compliance training (including on our gifts and hospitality policy, conflicts of interest and third-party screening processes) for all employees in exposed positions
- Enhanced our internal assurance program through review of all suppliers onboarded in 2021 to gauge adherence to the mitigation measures set out in this Statement
- Group reviewed its third-party engagement rules to include additional risk factors warranting additional screening and due diligence
- Formalised our approach to anti-slavery risk management through the launch of a dedicated compliance program
- Continued implementation of contractual terms regarding modern slavery into agreements with new and renewing suppliers
- Group achieved ISO 37001 “antibribery management system” certification
2022 Roadmap

Addressing modern slavery risks is an ongoing process. We will continue to build on the progress we have made throughout 2021.

- Continue to review and develop robust internal assurance measures to determine the effectiveness of our actions
- Increase transparency and awareness across our organisation
- Seek out opportunities to collaborate with our key suppliers
- Refresh training paths relating to the identification and management of modern slavery risks (including corruption risks), including the development of a general awareness elearning module to be made available to all employees
- Provide further targeted training for procurement and contract management teams
Thales Australia develops and delivers complex systems that push the boundaries of technological excellence through its expertise and infrastructure. The capabilities of Thales Australia span a wide spectrum of high technology products and services. Many of these solutions are the outcome of patient investment in, and collaboration with, local small and medium enterprises who are an integral part in delivering to our customers. Thales Australia primarily operates within Australia. Our corporate headquarters are located in Sydney, with branches in Taiwan, Philippines and Singapore.

In 2021, we procured approximately $1.22 billion of goods and services through our centralised Procurement team. We also increased our local spend by 6.1% which is a demonstration of our commitment to supporting local capability. We provide goods and services across the Asia Pacific, Europe, the Middle East, Central America and Africa.

Thales Australia operates in the following markets:

- **Digital Systems** is wide ranging and includes:
  - **Avionics** - provides simulators for civil & military aviation, land vehicle simulators, training environments, avionics and electronics for military and civilian aircraft, mission and unmanned aerial vehicle systems.

- **Ground Transportation Systems** - provides world-class capabilities in ground transportation systems including urban and main line signalling solutions, train control and supervision systems, light rail control systems, transport information systems, secured revenue collection systems for public transport and roads, and equipment calibration.

- **Secure Communications and Information Systems** - provides ICT solutions to defence and other national security organisations involving secure systems, encryption products & solutions, electronic security, software, networks cybersecurity and communications.

- **Land** - Vehicles & Tactical Systems designs, manufactures, installs and supports a wide spectrum of systems, equipment, and services for land forces involving protected mobility systems, vehicles, small arms, soldier systems, ordnance, munitions, Optronics, integrated logistics and through life support.

- **Air** - Airspace Mobility Solutions delivers advanced operational and navigational control capabilities involving air traffic management solutions, navigational aids, detection and communications systems, tower systems, air traffic control centres, and through life support services.

- **Sea** - Above Water Systems and Underwater Systems provide, design, manufacture and delivery of networked maritime warfare solutions and comprehensive through life support capabilities involving sonar and underwater systems, mine warfare, electronic warfare, radars, command and control.

Supporting our businesses are shared corporate departments which include Finance, Operations, Legal & Contracts, Human Resources, Strategy, External Affairs & Communications, Technical & Engineering, Marketing & Sales and Health Safety and Environment (HSE).
Assessment of the risk of modern slavery practices in our operations and supply chains

When assessing the risk of modern slavery within our operations and supply chain for the reporting period, we considered whether we may cause, be linked to, or contribute to modern slavery, in alignment with the United Nations Guiding Principles on Business and Human Rights. We assessed the inherent risk of modern slavery across our workforce and supply chain by using data from the 2018 Global Slavery Index (‘GSI’) and 2021 Transparency International Corruption Perceptions Index (‘CPI’) to help identify at-risk countries, sectors, and products and services.

Our people

Thales Australia employs over 3,800 people across our sites and offices – our people are integral to what we do. Based upon our review, we found there is an inherently low risk of modern slavery within our workforce.

Our workforce is primarily located in Australia across 35 sites, directly employed by us, and covered by Commonwealth Fair Work legislation and Fair Work approved enterprise agreements. We are committed to creating a workplace where our people prosper and this is reflected in our recruitment practices which include processes to ensure eligibility to work and our employee policies.

We have strong relationships with the providers of our labour hire and contingent workers. Our contracts contain provisions to mitigate the risk of modern slavery in these employment arrangements. Labour hire and contingent worker contracts are also subject to Fair Work legislation.

Supply chain

Our supply chain refers to the goods and services we procure through subcontractors, suppliers and service providers (collectively referred to as ‘suppliers’ in this Statement).

To assess the risk of modern slavery within our supply chain, we considered the geographic location, industry sector, products and services, governance of our suppliers, and the outputs of a transparency assessment completed in 2020. With reference to data from the GSI and CPI, we have identified the following categories of goods and services as being inherently at a higher risk of exploitation across tier 1 of our supply chain. We address the actions we have taken to mitigate these risks in the next section of this Statement.

- Electronics & technology including laptops, computers and mobile phones
- Property & Facilities management outsourced services including office maintenance and cleaning
- Materials such as building materials, ammunitions, consumables, electronic components, and labour used
- Apparel including items such as uniforms and personal protective equipment
- Office consumables such as tea, coffee and stationery
- Hospitality including catering and other food services, and business travel (including air travel, vehicles and accommodation)

Percentage of spend by category

<table>
<thead>
<tr>
<th>Category</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electronics &amp; Technology</td>
<td>2.3%</td>
</tr>
<tr>
<td>Property &amp; Facilities</td>
<td>5.2%</td>
</tr>
<tr>
<td>Materials</td>
<td>13.4%</td>
</tr>
<tr>
<td>Apparel &amp; PPE</td>
<td>0.1%</td>
</tr>
<tr>
<td>Office Supplies</td>
<td>0.2%</td>
</tr>
<tr>
<td>Catering &amp; Travel</td>
<td>0.1%</td>
</tr>
</tbody>
</table>

* % of total procurement spend in 2021
# 2021 Procurement Worldwide Spend

![World Map](map.png)

## Table: Procurement Spend by Country

<table>
<thead>
<tr>
<th>Country</th>
<th>Spend %</th>
<th>GSI Response Rating</th>
<th>Vulnerability Score</th>
<th>CPI Rank</th>
</tr>
</thead>
<tbody>
<tr>
<td>Australia</td>
<td>69.3%</td>
<td>BBB</td>
<td>4.27</td>
<td>18</td>
</tr>
<tr>
<td>France</td>
<td>10.4%</td>
<td>BBB</td>
<td>15.25</td>
<td>22</td>
</tr>
<tr>
<td>USA</td>
<td>3.5%</td>
<td>BBB</td>
<td>15.88</td>
<td>27</td>
</tr>
<tr>
<td>UK</td>
<td>3.5%</td>
<td>BBB</td>
<td>11.13</td>
<td>11</td>
</tr>
<tr>
<td>Germany</td>
<td>2.3%</td>
<td>BB</td>
<td>10.44</td>
<td>10</td>
</tr>
<tr>
<td>India</td>
<td>1.5%</td>
<td>B</td>
<td>55.49</td>
<td>85</td>
</tr>
<tr>
<td>Israel</td>
<td>1.4%</td>
<td>BB</td>
<td>26.42</td>
<td>36</td>
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<tr>
<td>Netherlands</td>
<td>1.2%</td>
<td>A</td>
<td>6.11</td>
<td>8</td>
</tr>
<tr>
<td>Belgium</td>
<td>1.1%</td>
<td>BBB</td>
<td>13.05</td>
<td>18</td>
</tr>
<tr>
<td>Austria</td>
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<td>BBB</td>
<td>3.35</td>
<td>13</td>
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<td>Spain</td>
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<td>BBB</td>
<td>12.80</td>
<td>34</td>
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<tr>
<td>Portugal</td>
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<td>BBB</td>
<td>8.49</td>
<td>32</td>
</tr>
<tr>
<td>Singapore</td>
<td>&lt; 0.6%</td>
<td>CCC</td>
<td>13.41</td>
<td>4</td>
</tr>
<tr>
<td>Switzerland</td>
<td>&lt; 0.6%</td>
<td>BBB</td>
<td>1.51</td>
<td>7</td>
</tr>
<tr>
<td>Italy</td>
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<td>BBB</td>
<td>28.29</td>
<td>42</td>
</tr>
<tr>
<td>China</td>
<td>&lt; 0.5%</td>
<td>CC</td>
<td>50.65</td>
<td>12</td>
</tr>
<tr>
<td>Canada</td>
<td>&lt; 0.3%</td>
<td>BB</td>
<td>10.20</td>
<td>13</td>
</tr>
<tr>
<td>South Korea</td>
<td>&lt; 0.1%</td>
<td>CC</td>
<td>29.83</td>
<td>32</td>
</tr>
<tr>
<td>Finland</td>
<td>&lt; 0.1%</td>
<td>BB</td>
<td>8.23</td>
<td>1</td>
</tr>
</tbody>
</table>

2. Percentage of total procurement spend in 2021

*Countries with spend accounting for <0.01% of total annual spend have been excluded.
Larrakia - Darwin & Yirriganydji & Gimuy Walubara Yidinji - Cairns
Providing asset management services in support of the Armidale Class Patrol Boat fleet.

Darug - Orchard Hills
Thales’s Armaments Service providing end to end logistics for the provision, distribution and maintenance of ordnance.

Wiradjuri, Gundungurra & Darug - Lithgow
Manufactured the ADF’s in service rifle for more than 100 years.

Wanaruah and Kamilaroi - Myambat
Thales’s Armaments Service providing end to end logistics for the provision, distribution and maintenance of ordnance.

Dja Dja Wurrung - Bendigo
The design, manufacture and export of the Bushmaster and Hawkei vehicles.

Wadjuk Noongar - Perth & Rockingham
Collins Class Submarine Sonar, Submarine Training & Simulation Support, MJP0 Lightweight Torpedo and Surface Ship Sonar sustainment, Explosive Ordnance Services, Software Development Services.

Wurundjeri - Melbourne
One of Thales’s Global Centres of Excellence in Air Traffic Management systems, $1Bn of ATM exports over the last 10 years.

Ngunnawal - Canberra
Providing hardware and software support services for critical Command & Control and telecommunications systems used on operations.

Jagara & Turrbul - Eagle Farm
Key sustainment location for the Bushmaster and Hawkei vehicles.

Wann-gal - Sydney Olympic Park
Thales ANZ corporate headquarters. Sales and support for Thales’s Digital Information and Security group.

Gadigal & Awabakal and Worimi - Garden Island, Waterhen & Newcastle
Ship repair and maintenance; dockyard management.

Pangerang & Yorta Yorta - Mulwala & Benalla
Producing world leading ammunition and propellant for the ADF.

Wurundjeri - Melbourne
One of Thales’s Global Centres of Excellence in Air Traffic Management systems, $1Bn of ATM exports over the last 10 years.

3800+ employees
35 sites

Wiradjuri, Gundungurra & Darug - Lithgow
Manufactured the ADF’s in service rifle for more than 100 years.
The prevention of violations of human rights and fundamental freedoms, and the health and safety of people is a fundamental imperative. The Group regularly reviews the measures it has in place to identify, mitigate and prevent modern slavery within its operations and supply chain. This informs our multi-faceted approach to modern slavery mitigation and is reflected in the policies and due diligence procedures we have implemented.

In preparing this Statement, we considered our governance framework, the policies and procedures applicable to our workforce and supply chain, incident and remediation measures, and engagement and awareness actions taken.

Policies & governance

We endeavour to conduct our business in a safe, responsible and sustainable manner. Our comprehensive governance and policy framework provides us with a strong foundation for assessing and addressing our modern slavery risk and demonstrates our dedication to managing the risks associated with modern slavery. Our key policies that support our commitment to the respect of human rights are set out below, with more information available on our website.

Policies

Our employees can easily view our policies and procedures (including those relating to modern slavery and corporate responsibility) in our centralised reference management system.

- Thales Group’s Code of Ethics communicates the standard of behaviour expected of all employees and suppliers to deliver our company purpose of “building a future we can all trust”. This includes requirements to comply with commitments made by Thales Group to the United Nations Global Compact principles concerning human rights, labour, the environment, and corruption prevention. It requires the completion of a corporate responsibility assessment of suppliers (which includes an assessment of compliance with social and environmental regulations and anti-corruption measures). It also sets out our expectations of suppliers.

- The Group Procurement Policy sets the standard for all procurement activities and supports our commitment to upholding the United Nations Global Compact concerning human rights, labour, the environment, and corruption prevention. It requires the completion of a corporate responsibility assessment of suppliers (which includes an assessment of compliance with social and environmental regulations and anti-corruption measures). It also sets out our expectations of suppliers.

- The Thales Australia’s Whistleblowing Policy and the Group Alert Line mechanisms are detailed in the Incident and Remediation section of this Statement on page 16.

- Thales Australia’s Appropriate Workplace Behaviour Policy sets out our commitment to providing a workplace free of all forms of discrimination, harassment, bullying, victimisation and vilification for all existing and prospective employees, visitors and customers.
• Thales Group’s Integrity & Corporate Responsibility Charter outlines our expectations of the suppliers we work with. It is based on the Code of Conduct of the International Forum on Business Ethical Conduct and covers human rights, employment practices, anti-corruption, and health and safety. The charter is referenced in our contracts and purchase orders. This is detailed further on page 15.

• A dedicated Modern Slavery Compliance Program was developed in 2021. Adopting the Thales Australia compliance management framework ensures the program reflects various facets of effective risk management when embedding anti-slavery practices into our operations. These policies are supplemented by our health and safety policies which cover various facets of workplace safety and underpin our mission to build a proactive safety culture.

Governance & Oversight
We have multiple forms of oversight to ensure that modern slavery risks are considered and managed at all levels of the organisation.

• Modern slavery is incorporated in the Thales Group approach to Corporate Responsibility and Integrity. It sets processes and procedures we are required to follow to minimise risks arising from corruption, bribery and modern slavery. There are various group-level governance committees including the Integrity and Compliance Committee, Risk Assessment Committee and Strategic and Corporate Social Responsibility Committee.

• Our Board is responsible for overseeing our operations and approving the annual modern slavery statement. It receives updates from the Compliance Audit and Risk Committee as required. The committee is made up of directors and members of the Thales Australia Executive Leadership Team. It assists the Board to fulfil its responsibilities concerning modern slavery compliance.

• Management committees that govern various aspects of our modern slavery approach include:
  • Ethics Committee: The Thales Australia Ethics Committee is chaired by our Chief Compliance Officer. It oversees the implementation, assessment and reporting of the Group’s Integrity and Compliance program, as well as identifying the main focus areas of other ethics, integrity and corporate responsibility policies in line with the values and priorities that the Group and Thales Australia Board has defined. The Committee also assesses the criticality of internal alerts made and any allegations of integrity or compliance violations brought to its attention. In addition, the Committee defines and allocates resources for promoting and sharing a culture of ethics, integrity and corporate responsibility within our organisation.
  • Procurement Compliance Committee: The Procurement Compliance Committee is attended by representatives of our procurement and legal teams to review procurement arrangements against criteria including anti-corruption and modern slavery. It considers whether the requisite due diligence processes have been followed, engagements should be entered, and whether remediation actions are required.

Contractual Clauses
We continued to incorporate integrity and corporate responsibility clauses into our new and renewing supplier contracts throughout 2021. These clauses require our suppliers to take steps to ensure compliance with corruption laws and adherence to our Integrity & Corporate Responsibility Charter which addresses modern slavery. These clauses also act to further awareness of the expectation of suppliers to manage the modern slavery risks within their own supply chain.
Employee arrangements

We employed approximately 90% of our people as direct employees (who may be permanent, fixed term, or casual employees). These employment arrangements are governed by Fair Work legislation, which provides a safety net of minimum entitlements, enables flexible working arrangements and prevents employee discrimination. We have six enterprise agreements that have been assessed against the Fair Work Act and the relevant modern awards, and approved by Fair Work Commission. These enterprise agreements are registered and legally binding instruments.

The remainder of our workforce is made up of labour hire and contingent workers. Our contracts with the providers of these workers:

• provide for these workers to receive the rates set out under the relevant enterprise agreements (in line with our direct employees);
• require that providers warrant compliance with anti-slavery and human trafficking policies and legislation, and implementation of processes to assess their own modern slavery risks; and
• require that providers notify us of any actual or suspected modern slavery by a person or within a supply chain affecting our engagement.

We are continuing to implement a replacement time and record keeping management system to allow us to track the hours our employees work to ensure correct conditions are applied.

Supply chain due diligence

Thales Australia manages a large portfolio of suppliers with purchasing primarily occurring through our centralised procurement team. We are committed to working with suppliers that respect human rights and are acting to address modern slavery risks. This approach allows us to embed a comprehensive risk-based approach to supply chain management that provides insight into the practices of our tier one suppliers, identifies areas of high risk, put in place mitigation plans and recognise the complex link between modern slavery and corruption.

We use a Group-wide procurement tool to support effective supplier management. As a single source of supplier information, it allows us to have greater visibility and control over our procurement practices, and easily manage our due diligence and risk management processes. As it integrates with our supplier portal, our suppliers can view our Integrity & Corporate Responsibility Charter, update information held, and respond to questionnaires.

The Integrity & Corporate Responsibility Charter

The vendor relationship begins with a commitment from our suppliers and partners to adhere to the principles set out in the Integrity & Corporate Responsibility Charter. Non-compliance to the charter may result in the implementation of a remediation plan, and in cases of continued or severe non-compliance, the termination of their contractual relationship with us. Our suppliers must ensure that their own suppliers and subcontractors, partners and associates comply with the same requirements set out in the charter.

Vendor Screening

We follow the Thales Group process for vendor screening which was revised during the reporting period to include additional categories of potential risk. This process has been developed through extensive mapping of Thales Group’s supply chain, and its risks relating to human rights, health and safety, and corruption. This mapping has identified 25 countries and 19 categories of supply at an increased risk of modern slavery practices, and 60 purchase categories at risk of corruption practices. A risk rating is ascribed to each supplier based upon the supplier’s geographic location and category of supply and determines the mitigating actions we will take to address modern slavery and corruption. A supplier may be required to undergo a corporate responsibility assessment and/or integrity assessment (detailed in this section) if they are identified as being in an at-risk category.
Corporate Responsibility Assessment
We have partnered with a third-party assurance organisation to help us better understand our supply chain and identify modern slavery risks. During onboarding, we provide supplier details to a third-party who provides an assessment of risk in the categories of human rights violations, environmental harm or poor health and safety. Suppliers assessed as high risk are required to undergo a further assessment process which includes:

- completion of a self-assessment questionnaire in which they provide details of their due diligence processes in relation to human slavery in their operations and supply chains and steps taken to assess and manage that risk.
- a desktop verification undertaken by the third-party’s compliance experts to assess the responses to the questionnaire and validate whether they comply.
- if a supplier is not able to be validated, they are requested to complete a corrective action plan which requires them to provide further evidence of improvement in areas of concern.
- we may request the third party complete a workplace condition assessment of a supplier. This involves a thorough review of their work conditions, management systems and corporate governance arrangements.

Integrity Assessment
To support the implementation of our Code of Conduct and our commitment to corporate social responsibility, we may request suppliers to complete an integrity assessment. We use the CPI to identify suppliers in geographic locations of risk supplemented by information about the supplier’s governance structures, and ethics and compliance policies. This enables us to build a risk profile and identify any areas which may indicate behaviour below the standard expected of our suppliers.

We are committed to building relationships with suppliers that are based on trust and dedication to corporate responsibility. When reviewing the responses to our integrity questionnaire, we may identify factors that require an in-depth investigation by a third party to before engaging with the supplier, or require a remediation or action plan be implemented. Our process also includes a list of factors which if identified, will prevent us from engaging with that supplier.

We recognise that assessing and addressing the risk of modern slavery in our extended supply chain (that is, beyond tier one) is a key challenge requiring further work to manage.

Grievance & remediation processes
We expect everyone to act consistently with our Code of Ethics and core values. In keeping with those values, we encourage our employees and others we work with to come forward through our whistleblowing process if they see conduct that they believe is problematic.

Our Thales Australia Whistleblower Policy sets out:

- the protections available to whistleblowers;
- how to make a disclosure including who is authorised to receive a disclosure; and
- our processes and procedures which includes a fair and independent investigation of disclosures.
Through this process we want to:

• give people who are aware of possible wrongdoing the confidence to speak up;
• ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
• identify wrongdoing as early as possible;
• ensure disclosures are dealt with appropriately and on a timely basis;
• provide transparency around our framework for receiving, handling and investigating disclosures; and
• help deter wrongdoing.

We also utilise the Group internal alert system which enables the reporting of concerns or incidents relating to conduct, abuses of human rights and fundamental liberties, and harm to health and safety, resulting from our activities or those of our suppliers.

Engagement, training & awareness

Training is provided to develop the skills and awareness of modern slavery within our procurement teams and our people manages. In 2021, our people managers underwent training to ensure our employees are working under fair conditions and in a safe environment, and our procurement team hosted educational sessions with business teams to further embed our mitigation processes. Representatives from our procurement team also engaged with external parties to share learnings around modern slavery and procurement practices.

From the beginning of their employment with us, our people are informed of our expectations in relation to modern slavery, equality of treatment, avoiding discrimination, ensuring respect and providing a safe and healthy working environment. New starters are required to complete an ethics awareness module as part of their onboarding training, and our Code of Ethics is systematically given to and acknowledged by new employees.

Group’s Ethics, Integrity and Corporate Responsibility in conjunction with our local Modern Slavery intranet page (established during the reporting period) allows for continued awareness and engagement on the risks. Through these pages, all employees can view the latest news, learn more about our policies, guides, tools and internal instructions and access the Group’s internal alert system.
Assessing the effectiveness of these actions

When it comes to modern slavery and corruption, we have a strong risk culture embedded within our organisation. We believe this allows and encourages our people to raise concerns with their leader, through our Whistleblower program or Alert system. During the reporting period, we received no disclosures in relation to modern slavery.

We are committed to working to mitigate modern slavery risks that may arise within our operations and supply chain, and to building our maturity and understanding around this. We consider our comprehensive due diligence procedures through our procurement process plays a vital role in our efforts to tackle modern slavery, however further work is required to measure its effectiveness.

Risks associated with the procurement process are monitored through procurement dashboards which considers indicators including the number of suppliers that have signed the Integrity & Corporate Responsibility Charter and the evaluation of these suppliers in terms of Corporate Responsibility.

Each year we complete an attestation process which addresses our actions taken on human rights, health and safety of employees, and environmental protection. We also conduct internal and external audits and reviews to ensure the terms and conditions of employment are applied correctly.

In addition, all Human Resources personnel are responsible for monitoring any anomalies or concerns in their subject areas and report any identified issues to the compliance team. Where any concerns are identified as a result of the review, the issues are further examined by a team of internal and external advisors who develop and implement the necessary remediation actions.

We acknowledge that whilst Australia is considered to be a low risk geographic location, it is not immune from modern slavery. Further work is required to assess these risks of modern slavery within our local supply chain and whether additional measures are required.