

The Swift logo is centered in the upper half of the page. It consists of the word "swift" in a bold, white, lowercase sans-serif font. A small teal dot is positioned above the letter 'i'. The logo is set against a circular gradient background that transitions from a lighter blue at the top to a darker blue at the bottom.

swift

Modern Slavery Policy Document

Swift Networks





1 PURPOSE

In accordance with the Modern Slavery Act 2018, this statement outlines the steps that Swift Networks has taken, and is continuing to take, to assess and reduce risks of modern slavery within our business and our supply chain, and our plans to review our existing policies and make improvements to our supply chain.

2 SCOPE

This policy applies to all employees of Swift Networks Group Limited and all of its subsidiaries (collectively, referred to as 'Swift').

3 BACKGROUND

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. It takes various forms, such as slavery, human trafficking, forced labour, servitude and debt bondage, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain .

We recognise that we have a responsibility under the Modern Slavery Act to take a strong approach to reject any forms of modern slavery and human trafficking. We are committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both in our own business and our supply chain.

4 OUR COMMITMENT

Swift is committed to limiting the risk of modern slavery occurring in our business, ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chain.

We expect our employees and our suppliers to share our commitment to help ensure modern slavery does not exist in our business and our supply chain.

Should Swift become aware that any supplier does not align with our approach to Modern Slavery, we will engage directly with the supplier and develop an action plan to eradicate the practise in a transparent, timely and efficient Modern Slavery Policy Statement March 2022 ASX:SW1 manner.

Should the supplier be uncooperative, the appropriate action will be taken, including terminating the business relationship, if necessary, by Swift.



MODERN SLAVERY POLICY DOCUMENT

MARCH 2022

ASX:SW1



Who We Are

Swift is a specialist technology company delivering network infrastructure, premium entertainment and communications to 60,000 rooms nationally across Mining and Resources, Residential Aged Care, Hospitality and other closed loop environments. We believe there is no risk of modern slavery being evident within our direct workforce as the Australian labour market is highly regulated. As an employer we are bound by the workplace conditions and entitlements as set out in the Fair Work Act 2010, Modern Awards and the National Employment Standards.

Our Suppliers

We procure goods and services from a number of contracted and preferred suppliers located mostly in Australia, with some hardware being directly purchased from China. Our long-standing relationship with suppliers provides stability in our supply chain and procurement process. As a significant number of our suppliers are located within Australia, we believe they present a low risk as they too are required to comply with the Modern Slavery Act within their own supply chains. To ensure supplier compliance, we have implemented a Modern Slavery Supplier Evaluation Form that will be sent out to all Suppliers with responses and commitment to compliance recorded in our supplier register.

Corporate Governance

We will continue to review our policies to ensure ongoing compliance with the Modern Slavery Act. We will educate our employees on the importance of this Modern Slavery Policy to increase awareness of the risk of modern slavery in our business and that of our suppliers.

