

MODERN SLAVERY STATEMENT

1. OUR STATEMENT

- (a) Redflex Holdings Limited ACN 069 306 216 (**Redflex**) and its subsidiaries (**Redflex Group**) are opposed to all forms of slavery.
- (b) This statement is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) (the **Act**). Redflex, on behalf of the Redflex Group, is the reporting entity for the purposes of this statement.
- (c) Redflex adopts the definition of “modern slavery” in the Act, which includes slavery, human trafficking and forced labour.
- (d) At Redflex, we recognise our community responsibility in maintaining the protection of human rights through Redflex’s own ethical business practices. Redflex also recognises that the maintenance of human rights laws and standards is an important issue to our employees, customers, suppliers, shareholders, stakeholders and the global community. Therefore, Redflex seeks to ensure that human rights are valued across Redflex’s global businesses, operations and supply chains.
- (e) Redflex respects and supports these globally recognised instruments:
 - (i) Universal Declaration of Human Rights;
 - (ii) United Nations Guiding Principles on Business and Human Rights;
 - (iii) United Nations Global Compact;
 - (iv) International Labour Organization Declaration on Fundamental Principles and Rights at Work;
 - (v) United Nations Women’s Empowerment Principles; and
 - (vi) United Nations Sustainable Development Goals.
- (f) Consistent with our Risk & Compliance Policy and Framework, Redflex adopts a risk-based approach to modern slavery due diligence in its operations and supply chains.

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

- (a) Redflex was listed on the Australian Securities Exchange in January 1997 and has its headquarters in South Melbourne, Victoria. Redflex’s operations occur through various subsidiaries in Australia, New Zealand, South-East Asia, North America, United Kingdom, the Middle East and Europe. All entities within the Redflex Group are identified in the Redflex Annual Report which is disclosed to the Australian Securities Exchange and appears on our website (www.redflex.com) each year.
- (b) The Redflex Group has established itself as a world leader in traffic enforcement products and services, developing leading enforcement camera technology and



owning and operating one of the largest networks of digital speed and red-light cameras in the world. Redflex develops and manufactures a wide range of digital photo enforcement solutions including red light camera, speed camera and school bus stop arm camera systems, all utilising the most advanced sensor and image capture technologies.

- (c) The Redflex Group runs its own systems engineering operations, system integration technologies and innovation centre for research and development. With our continuous development of new safety products, the Redflex Group has been helping to reduce collisions and to save lives for more than 25 years.
- (d) The Redflex Group employs more than 500 people globally. Redflex also works with various global suppliers, business partners and other key stakeholders. We recognise that each entity within the Redflex Group’s operations and supply chains has its own independent obligation to observe human rights laws and standards.
- (e) Accordingly, while our operations and supply chains may be multifaceted, we endeavour to ensure that the issue of modern slavery is understood and respected and that human rights laws and standards are observed.
- (f) Redflex reasonably expects its supply chains, business partners and other key stakeholders to observe ethical business standards consistent with Redflex’s values (see Redflex’s Statement of Values disclosed on our website (www.redflex.com)), and remains committed to working with its supply chains, business partners and other key stakeholders to fulfil this aspiration.

3. OUR POLICIES AND GOVERNANCE

Policies

- (a) Redflex’s policies and governance framework support its day-to-day operations and are intended to ensure all relevant commonly recognised human rights laws and standards are observed.
- (b) Consistent with the Redflex Employee Code of Conduct and Ethics, Redflex is committed to making positive economic, social and environmental contributions to society, consistent with the principles of honesty, integrity, fairness and respect.
- (c) Redflex opposes discrimination and modern slavery, and remains committed to safe working conditions, including the right to freedom of association and collective bargaining.

Governance

- (d) Issues of modern slavery in Redflex’s operations and supply chains are managed by procurement who identify, assess and manage modern slavery issues with our suppliers. This is done through a variety of means including “knowing our suppliers”, being in regular contact with and personally visiting our suppliers (where appropriate), conducting reasonable due diligence in relation to our suppliers (and choice of suppliers) and reviewing and assessing the performance of our suppliers using qualitative and quantitative criteria.



- (e) Procurement and business units record compliance obligations and risk management matters in the Redflex Group risk and compliance management and reporting system. These compliance obligations and risks are regularly reviewed and assessed, along with the identification and assessment of the effectiveness of Redflex's internal controls, processes, procedures and mitigation strategies to minimise both the occurrence and impact of any failure.
- (f) Ethical sourcing and human rights issues are overseen through regular reporting to the Audit & Risk Committee, a committee of the Redflex Board of Directors.

4. OUR RISK ASSESSMENT AND DUE DILIGENCE PROCESSES

- (a) Redflex has adopted a risk-based approach to modern slavery due diligence and continues to review the risk of modern slavery practices across our operations and supply chains.
- (b) Redflex is focused on respecting the human rights of our employees and the human rights of those in our supply chains. Given that compliance and risk management is an ongoing activity, Redflex continues to work to improve its supply chain due diligence processes.

Respecting human rights in our supply chains

- (c) While our operations and supply chains are multifaceted, our aim is to ensure that human rights are respected and understood. Our due diligence includes the following actions:

Establishing which suppliers to work with

- (i) Taking a risk-based approach, the decision to conduct detailed due diligence on a supplier is based on the goods or services, industry, country of origin and particular vendor.
- (ii) Before we contract with a new supplier who may be identified as high risk, we require that supplier to complete a self-assessment questionnaire.
- (iii) Redflex considers whether there may be any government mandated trade sanctions or bans that may be in place against that supplier or the country in which it is located.

Communicating our ethical and responsible sourcing policy to suppliers

- (iv) Redflex will only contract with suppliers to supply goods or services who operate in line with our policies, processes and standards. This is communicated in our contracts with suppliers.
- (v) Suppliers must agree to act transparently, to remedy any adverse or at risk issues, and to drive continuous improvement.



Building long-term relationships

- (d) Redflex aims to build and develop long-term relationships with its suppliers. Redflex believes that long-term relationships can lead to increased certainty on quality, to increased efficiencies and productivity and in the delivery of enhanced products and services while safeguarding human rights.

Risk assessment and mitigation

- (e) Redflex continues to increase its collaboration with internal and external stakeholders to identify and manage the global risk of modern slavery. Redflex is focusing on raising awareness of the forms of modern slavery among its employees and suppliers, continuing to evolve its due diligence processes to aid in the identification of risks, expanding the scope of its supply chain risk assessment, reviewing existing processes and exploring ways to improve identification and action on risks throughout its supply chains.
- (f) Redflex will continue to incorporate modern slavery contract clauses into existing and new contracts and embed modern slavery risk management into existing operational systems and processes.

Remediation

- (g) If non-compliance is identified, the supplier is required to fix the issue within an appropriate period of time depending on the nature and severity of the non-compliance. If a supplier addresses non-compliance, it is deemed to be an “approved” supplier. In this way, our audit process is contributing to improving conditions for workers by working with suppliers to address any issues. If a supplier is not willing or able to address a critical breach, our business will stop purchasing or working with that supplier.

Training and capacity building

- (h) Redflex keeps its buying teams up-to-date on ethical sourcing and human rights commitments. We are also initiating a specific training program for relevant employees on the impacts and risks of modern slavery.

Effectiveness of grievance mechanisms

- (i) Redflex places importance on the provision of effective company-based grievance mechanisms to escalate issues wherever human rights impacts occur in its operations. We continue to build the awareness and knowledge of our employees on human rights, encouraging them to speak up about any concerns they may have, without fear of retribution and with full confidentiality if required. They can speak up informally or through our whistle blower and human resources grievance channels. We also promote the provision and implementation of effective grievance mechanisms by our suppliers.
- (j) Redflex’s procurement team is responsible for building relationships with our supply chains and providing grievance channels. This has also been introduced within our new contracts with suppliers, which include specific expectations on modern slavery.

5. REVIEW OF THIS STATEMENT

- (a) Redflex will review this statement periodically to ensure it complies with applicable legal requirements and remains relevant and effective.
- (b) This statement is not intended to be contractual in nature.
- (c) The Redflex Board of Directors may change this statement at any time.

6. ACCESS TO THIS STATEMENT

This statement will be available on www.redflex.com in the Investors / Governance section.

7. CHANGE HISTORY

Change History Log

| Version | Description | Date |
|---------|-----------------|------------------|
| 1.0 | Initial Version | 17 February 2021 |

This statement has been approved by the Redflex Board of Directors.

A handwritten signature in black ink, appearing to read "Adam Gray", is positioned above the printed name and title.

ADAM GRAY
Chairman
17 February 2021