

Modern Slavery Policy

June, 2021

Booktopia Group Limited ACN 612 421 388

Modern Slavery Policy

Booktopia Group Limited ACN 612 421 388 and its subsidiaries (the Company)

1. Background

1.1 Overview

The term 'modern slavery' refers to a range of serious forms of exploitation including forced labour, debt bondage, servitude, forced marriage, the worst forms of child labour, human trafficking and slavery.

Booktopia understands and acknowledges that modern slavery may be present without our knowledge in Booktopia's operations and supply chain. Booktopia is constantly developing its understanding of the modern slavery risks in its operations and supply chain and ways to reduce the occurrence of modern slavery in the world through those it does business with.

1.2 Modern Slavery (Anti-Slavery) Policy

Booktopia is committed to limiting the risk of modern slavery occurring within its own business, in its supply chains or through any other business relationship. Each year it develops a Modern Slavery Statement that is published publicly, describing Booktopia's own efforts to help abolish modern slavery.

This policy applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative. Booktopia expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with its values.

Booktopia aims to only do business with organisations who comply with this policy, or those who are taking verifiable steps towards compliance.

This policy will be used to underpin and inform any statement on slavery and human trafficking that Booktopia is required to produce further to the Modern Slavery Act, 2018 (Cth).

2. Key Principles

2.1 What is Modern Slavery

The Modern Slavery Act, 2018 (Cth) defines modern slavery as:

conduct which would constitute:

- (a) an offence under Division 270 or 271 of the *Criminal Code*; or
- (b) an offence under either of those Divisions if the conduct took place in Australia; or
- (c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- (d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

2.2 Our Commitment

The Company is committed to reducing the risk of Modern Slavery within the Group and its supply chain and requires and expects its suppliers and employees to comply with the Modern Slavery Act.

Suppliers are expected to investigate and report to the Company on the labour and modern slavery practices of its supply chains.

2.3 Key Initiatives and Programs

The Company aims to introduce and / or maintain the following programs and initiatives to assist with managing the outcomes of its Anti-slavery efforts:

- (a) supplier surveys to track Anti-Slavery compliance;
- (b) insertion of Anti-slavery content in employee induction programs;
- (c) insertion of Anti-slavery content in supplier induction programs;
- (d) Modern Slavery Statement reporting to Border Force
- (e) Education and re-education programs for Booktopia employees

2.4 Communication

In order to promote transparency and accountability and to further the objectives of this policy the Company will post a copy of this policy on its website. It will also provide ongoing training to its employees.

2.5 Responsibilities

The Board is ultimately accountable for this Policy, through the Audit and Risk Committee.

The Managing Director/CEO and members of the leadership team are responsible for the implementation of this policy and monitoring compliance with it, with the Company Secretary being responsible for the administration of the policy (including in relation to reporting to the Board, or its relevant Board committee as appropriate).

3. Other matters

3.1 Adoption of Policy and Board review

This Policy was adopted by the Board on 28th June, 2021 and takes effect from that date and replaces any previous policy in this regard.

The Board will review this Policy periodically. The Company Secretary will communicate any amendments to employees as appropriate.

3.2 Amendments to this Policy

The Company may discontinue or amend any part or the whole of this policy from time to time at its absolute discretion. This Policy can only be amended with the approval of the Board.

End.