

MODERN SLAVERY POLICY

Effective date: April 2026

Approved by: Directors, Antinous Group Pty Ltd

Next review: April 2027

1. Purpose

Antinous Group Pty Ltd (“Antinous Group”) is committed to conducting business ethically, responsibly, and with respect for human rights.

This Modern Slavery Policy sets out our commitment to preventing modern slavery and human trafficking in our operations and supply chains, and outlines the steps we take to identify, assess, and mitigate modern slavery risks.

This policy is aligned with the *Australian Modern Slavery Act 2018 (Cth)* and Section 54 of the *UK Modern Slavery Act 2015*.

2. Our Business

Antinous Group Pty Ltd is an Australian-based digital learning, design, and consulting business. Our services include:

- Custom eLearning design and development
- Learning strategy and advisory services
- Digital design, media, and creative services
- (Future) learning systems and software products

We operate primarily in Australia and the UK, working with corporate, government, education, and not-for-profit clients. We are a low-risk professional services organisation, with no direct manufacturing or physical supply chains.

3. Our Commitment

Antinous Group is committed to:

- Respecting internationally recognised human rights
- Preventing modern slavery in our operations and supply chains
- Acting with transparency, integrity, and accountability
- Working only with suppliers who share our commitment to ethical labour practices

We do not tolerate any form of modern slavery, forced labour, child labour, debt bondage, servitude, or human trafficking.

4. Scope

This policy applies to:

- Antinous Group Pty Ltd
- All directors, employees, contractors, and subcontractors
- All suppliers, service providers, and business partners

5. Understanding Modern Slavery

Modern slavery includes situations where individuals are exploited and cannot refuse or leave due to threats, violence, coercion, abuse of power, or deception. This includes:

- Forced labour
- Child labour
- Debt bondage
- Human trafficking
- Servitude

6. Risk Assessment

6.1. Operational Risk

Antinous Group's direct operations are considered low risk for modern slavery, as we:

- Operate in Australia and the UK under strong workplace and labour laws
- Engage primarily in professional, knowledge-based services
- Do not employ low-skilled or vulnerable labour groups
- Do not operate in high-risk geographies

6. Risk Assessment

6.2. Supply Chain Risk

Our supply chain is limited and typically includes:

- Professional contractors (e.g. designers, developers, voice artists)
- Software and technology providers
- Business services (legal, accounting, hosting)

While overall risk is low, we acknowledge that modern slavery risks can exist in extended or indirect supply chains (e.g. global software or hosting providers).

7. Risk Mitigation Measures

To mitigate modern slavery risks, Antinous Group:

- Engages suppliers that operate in jurisdictions with strong labour protections where possible
- Prefers reputable, established suppliers with transparent labour practices
- Includes ethical conduct expectations in supplier and contractor arrangements where appropriate
- Avoids suppliers known to operate in high-risk industries without adequate safeguards
- Reserves the right to cease relationships where modern slavery concerns are identified

8. Due Diligence & Supplier Expectations

We expect our suppliers and contractors to:

- Comply with applicable labour and employment laws
- Not engage in any form of modern slavery
- Treat workers fairly, safely, and lawfully

For higher-risk suppliers (if engaged in future), Antinous Group may:

- Request confirmation of modern slavery policies or practices
- Seek additional assurances or disclosures
- Include contractual clauses addressing ethical labour standards

10. Training & Awareness

Given the size and nature of the business, formal modern slavery training is not mandatory at this stage. However, directors and relevant personnel are expected to:

- Be aware of modern slavery risks
- Consider ethical and labour practices when engaging suppliers
- Raise concerns where appropriate

11. Governance & Accountability

Responsibility for this policy rests with the Directors of Antinous Group Pty Ltd.

This policy will be reviewed annually and updated as the business grows, particularly if operations expand internationally or into higher-risk supply chains.

9. Reporting Concerns

Anyone who becomes aware of, or suspects, modern slavery or unethical labour practices connected to Antinous Group's operations or supply chains is encouraged to report concerns promptly.

Reports can be made confidentially to:

Email: hello@antinous.com.au

Attention: Directors, Antinous Group Pty Ltd

Reports will be taken seriously and investigated appropriately.

12. Continuous Improvement

As Antinous Group scales, we commit to:

- Reviewing our modern slavery risk profile
- Enhancing due diligence processes where required
- Complying with reporting obligations under the *Modern Slavery Act* if thresholds are met

Contact

For all enquiries:

Email: hello@antinous.com.au

www.antinous.com.au