

newbritainhaulage.com

NBH101-POL-AB-0525

Anti Bribery and Corruption Policy

New Britain Haulage (NBH), is committed to conducting its business and activities with integrity. NBH prohibits Bribery and Corruption in any form, whether direct or indirect, whether in the private or public sector. to achieve this objective, New Britain Haulage:

- · will not engage in corrupt business practices;
- has implemented measures to prevent bribery and corruption by any officer, employee and third party (including contractor) representing NBH; and
- will, at a minimum, comply with all legislation that relates to bribery and corruption as well as any relevant industry standards.

Compliance with this policy is mandatory. Penalties may be imposed by legislation on NBH, its officers and employees, and third parties (including contractors) representing NBH for non-compliance with anti-bribery and corruption measures. Further, any breach of this policy or legislation may result in the termination of an employee's or contractor's services with NBH.

This policy is supported by the anti-bribery and corruption procedure and the NBH code of conduct, which must also be complied with. Examples of conduct that may amount to bribery and/or corruption and, therefore, be a breach of this policy include:

- not paying for goods or services provided to NBH or paying a price for goods or services provided to NBH that is greater than the fair market value of the goods or services received;
- · making facilitation payments;
- giving or receiving gifts and entertainment that go beyond common courtesies associated with general commercial practice;
- acting on hiring, contracting or subcontracting recommendations from government officials or foreign public officials without complying with NBH's standard hiring, contracting or subcontracting criteria;
- not disclosing a conflict of interest;
- · making political or other donations; and
- making any unauthorised cash transactions.

These examples are not exhaustive. All of NBH's officers, employees and third parties (including contractors) must be vigilant and ensure they do not engage in conduct that amounts to bribery and/or corruption. All of NBH's officers, employees, and third parties (including contractors) must report any conduct that may be bribery and/or corruption. The process for reporting such conduct is set out in the whistleblowing procedure. For further information, please contact your HR Manager.

Dale Tate Managing Director

Dated 12th May 2025.



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NBH102-POL-MS-0525

Modern Slavery Policy

- 1: Opening statement from senior management, New Britain Haulage and its subsidiaries are committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and impose the same high standards on its suppliers.
- 2: Structure of the organisation New Britain Haulage is a Papua New Guinea third-party haulage business providing nationwide contract logistics and supply chain services to a range of companies. The New Britain Haulage structure consists of New Britain Haulage and all subsidiary businesses. We work with a range of suppliers providing agency labour and/or professional contract services.
- **3: Policies** As part of our commitment to combating modern slavery, we have implemented an Anti-Slavery Policy, together with supporting documents dealing with risk assessments and supplier audits. We also make sure our suppliers are aware of our policies and adhere to the same high standards. These policies have been developed and agreed by the New Britain Haulage Board.
- **4: Policies and Procedures** As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following policies and procedures.
 - Set the tone from the top through a Board-level communication, reinforcing the organisation's zero tolerance towards modern slavery.
 - Adopting a modern slavery policy and supplier code of conduct, and/or modifying existing policies and codes.
 - Undertaking a risk assessment of existing supplier relationships.
 - Reviewing procurement policies and procedures to ensure that they are capable of responding to any issues identified in the
 risk assessment.
 - Updating standard contracts to ensure that suppliers are required to comply with the policy and/or code of conduct and the Criminal Code Act 2002.
 - Ensuring that whistleblowing policies cover modern slavery reporting.
 - Implementing a targeted training programme to ensure that those responsible for procurement or managing supply chains are aware of the issues.
- **5: Risk and compliance** New Britain Haulage regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by the risk management activities carried out and/or procedures in place. We do not consider that we operate in high-risk sectors or locations, and New Britain Haulage complies with all legislative and professional standards. Where we have identified a potential risk, these risks can be investigated, remediated and mitigated through activities such as due diligence, improved procurement practices and industry collaboration. We aim to ensure all our suppliers adhere to our Anti-Slavery Policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policy, we will immediately seek to terminate our relationship with the relevant supplier.
- **6: Effectiveness and KPIs** New Britain Haulage uses relevant management information to measure how successful we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.
- 7: Training We continue to invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of the organisation's Anti-Slavery Policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.
- **8: Further actions and sign-off** Following our review of actions this year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to continue to review and take further necessary steps to tackle slavery and human trafficking. This statement is made in accordance with the Criminal Code Act 2002 and constitutes New Britain Haulage's slavery and human trafficking statement for the year ending May 2025.

Dale Tate
Managing Director

Dated 12th May 2025.





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NBH103-POL-WB-0525

Workplace Behaviour Policy

New Britain Haulage understands the necessity to maintain a workplace free from violence, aggression and bullying. It is a requirement of employment that this policy be adhered to. Both physical and psychological harm can occur as a result of these types of behaviours. All workers in the workplace are potentially at risk.

Violence, aggression and bullying can occur from both external and internal circumstances. Unacceptable behaviours include, but are not limited to, the following:

- · Threats or acts of violence
- Intimidation
- Verbal abuse
- Sexual harassment, both verbal and physical
- Ethnic or racial vilification
- Initiation ceremonies
- Degradation via social media outlets

Behaviours such as these are not tolerated at New Britain Haulage. Issues arising from the above behaviours should be reported to your Manager or Supervisor. Incidents shall be investigated fully and recommendations made to management.

Disciplinary action will be taken against any employee found to have breached this policy. Discipline may involve warnings, counselling or dismissal, depending upon the circumstances.

New Britain Haulage reserves the right for Managers and Supervisors to give lawful directions to employees, which do not constitute bullying.

Dale Tate Managing Director

Dated 12th May 2025.