



HANSEN MODERN SLAVERY  
POLICY  
March 2021

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## 1 INTRODUCTION

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The Hansen Technologies Group consists of Hansen Technologies Limited (ACN 090 996 455) (ASX: HSN) and all other related entities of Hansen Technologies (“**Hansen**”, “**Group**” or “**we**”).

At Hansen we are guided by our Hansen Group values. These values are the foundation of how we behave and interact with each other, our customers, suppliers, shareholders, and other stakeholders. Together our values reflect the priorities of the business and provide guidance in decision making.

Hansen’s Code of Conduct and other policies have been developed to align with our values to ensure that we observe the highest standards of fair dealing, honesty and integrity in our business activities.

This Modern Slavery Policy (“**Policy**”) has been put in place to ensure that Hansen and its employees respect and promote human rights, and contribute toward eradicating modern slavery.

Capitalised terms in this Policy are defined in Annexure 2.

## 2 PURPOSE

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We are committed to acting ethically and with integrity to ensure that there is no Modern Slavery in our supply chains or in any part of our business.

We are committed to implementing and enforcing effective systems and controls to ensure Modern Slavery practices are not taking place anywhere in our operations and supply chains. We are committed to acting in compliance with modern slavery laws that apply to Hansen.

To this end, this Policy aims to:

- ensure that we comply with the Modern Slavery Act 2018 (Cth) (“**Act**”), and other comparable modern slavery acts globally, by documenting Hansen’s minimum standards in relation to Modern Slavery that we expect of ourselves, and our suppliers;
- encourage individuals to report an issue if they genuinely believe that there is Modern Slavery within Hansen or its supply chains; and
- outline how Hansen will deal with any reports of Modern Slavery within Hansen or within its supply chains.

## 3 SCOPE OF POLICY

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This Policy applies to all entities, divisions, business units, officers and employees of the Group.

## 4 WHAT IS MODERN SLAVERY?

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Modern Slavery is defined in the Act to include the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage

## 5 WHAT ARE OUR MINIMUM STANDARDS?

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Hansen's minimum standards in relation to Modern Slavery are set out in Appendix 1 to this Policy ("**Minimum Standards**"). Hansen expects that all of the entities within the Group, its employees and suppliers within the Group's supply chain to:

- comply with the Minimum Standards;
- encourage (and where practicable, contractually require) suppliers to comply with the Minimum Standards as if they were Hansen; and
- monitor suppliers to ensure compliance with the Minimum Standards and immediately notify the persons identified in section 6 of this Policy of any actual or suspected non-compliance to the Minimum Standards.

## 6 REPORTING NON-COMPLIANCE

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Concerns about non-compliance with the Minimum Standards (actual or suspected) can be raised with a manager within the relevant division/business unit or geographic region. A supervisor or manager in receipt of a report must take the matter to a senior executive within the geographic region or Hansen's head office. Alternatively the matter may be brought to the attention of Hansen's Board of Directors, via the Chair of the Audit & Risk Committee.

The current Chair of the Audit & Risk Committee is:

Mr Don Rankin

Director

Email: [don.rankin@hansencx.com](mailto:don.rankin@hansencx.com)

Concerns could also be raised by post to 2 Frederick Street, Doncaster, Vic 3108, Australia (marked to the attention of the Chair of the Audit & Risk Committee).

Where any possible non-compliance with the Minimum Standards has been reported under this section 6, then Hansen shall further investigate the risk, and assess whether there are any violations to remediate. Where appropriate, Hansen will provide feedback to the individual who reported any suspected non-compliance with the Minimum Standards regarding Hansen's investigation.

Hansen's Whistleblower Policy will apply to a concern raised under this section of the Policy. The Whistleblower Policy provides a series of protections with respect to the identity and confidentiality of the complainant, files and records and provides for fair treatment of complainants.

## 7 HANSEN'S ONGOING MODERN SLAVERY OBLIGATIONS

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Hansen has implemented an ongoing process of identifying and assessing areas of our business where there may be a higher risk that there is non-compliance with the Minimum Standards, to then further investigate and remediate appropriately. In accordance with Australian law, Hansen provides a Modern Slavery Statement annually describing its activities.

Hansen encourages all of the entities, divisions, business units and employees within the Group to have regular engagement with and seek feedback from their suppliers (particularly those operating in the

sectors or countries that have been identified to have a higher risk of Modern Slavery practices) regarding changes to work practices and the supply chain. Continuous updating of Hansen's supply chain mapping will provide Hansen with a greater understanding of the risk of Modern Slavery within a supplier's supply chains or operations and enable Hansen to work with the supplier to reduce the risk identified. Risks identified and addressed within a financial year should be recorded and reported to the responsible officer at Hansen's head office to enable an annual review and update of the Group's global supply chain and preparation of the annual Modern Slavery Statement.

## 8 BREACH OF THIS POLICY

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Any breach of this Policy will be taken seriously and may result in counselling and/or disciplinary action, up to and including summary dismissal.

## 9 GENERAL

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It is a condition of any employment or engagement by Hansen that all employees of Hansen must comply at all times with this Policy. However, this Policy does not form part of any agreement between any person and any Hansen Group company (unless specified otherwise in the relevant agreement).

*This Policy can only be amended with the approval of Hansen's Board of Directors. Any amendments to this Policy shall be affected by the posting of an updated version of the document on HanseNet. This version of the Policy was approved by the Board on 26 February 2021.*

## Appendix 1: The Minimum Standards

No Forced, Bonded or Indentured Labour	<p>Employment shall be freely chosen. Hansen shall:</p> <ul style="list-style-type: none"> <li>(a) not use any type of <b>Forced Labour, Bonded Labour or Indentured Labour</b>;</li> <li>(b) respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment; and</li> <li>(c) ensure that workers are free to leave their employer after reasonable notice.</li> </ul>
No Child Labour*	<p>Hansen shall comply with the minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (“ILO”) Convention 138.</p> <p>Hansen must be able to verify the age of all employees to ensure compliance. Hansen must accept the Principles of Remediation of child and underage workers, and where such labour is discovered Hansen must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of Child Labour in the future.</p>
Wages, benefits, and transparent record keeping	<p>Hansen must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits. Record keeping must be accurate and transparent. Workers must be provided with written and understandable information about their employment conditions before they enter employment and about their wages for each pay period. Deductions from wages for disciplinary measures or any deductions from wages not provided for by law shall not occur without the express permission of the worker concerned. All disciplinary measures should be recorded.</p>
Working hours	<p>Working hours must comply with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable ILO convention. Overtime shall be agreed, shall not be excessive, shall not be requested on a regular basis and shall be compensated as prescribed by applicable local laws.</p>
No discrimination	<p>All conditions of employment must be based on an individual’s ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation. Hansen must ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.</p>
No harassment or abuse	<p>Workers shall be treated with dignity and respect. In particular, Hansen will provide a workplace free from harassment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.</p>
Freedom of association, grievance mechanisms and recourse	<p>Hansen shall respect the rights of workers to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country of operation. Workers should have the right to join or form trade unions of their choosing.</p> <p>Hansen should not interfere with, obstruct or prevent legitimate related activities, such as collective bargaining. Workers are allowed to select worker representatives. Representatives should not be discriminated against and should have regular access to company management or appropriate process in order to address grievances and other issues.</p> <p>Hansen must have a policy in place for workers to approach management on issues of concern, on their own or through worker representatives, confidentially.</p>

Working conditions	<p>Hansen shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied and workers trained in their use.</p> <p>Where Hansen provides accommodation it shall be clean, safe and meet the basic needs of workers. Workers will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation. Workers have the right to refuse work that is unsafe.</p>
No bribery	<p>Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise. Hansen shall keep accurate records of all payments made and received in cash or in kind, for audit purposes.</p>
Sub-contracting	<p>Where sub-contracting is permitted, Hansen must have adequate processes in place for properly managing sub-contracting to ensure that sub-contractors operate in accordance with this and any applicable divisional/business unit policy, and is undertaken strictly in accordance with the contract.</p>
Environmental compliance	<p>Hansen shall comply with relevant local and national environmental protection laws and will as far as practicable comply with international environmental protection standards.</p>
Animal welfare	<p>Hansen must ensure animals are treated humanely and with respect.</p>
Migrant workers	<p>Migrant workers shall have the same entitlements as local workers as stipulated by local law. Any commissions and other fees in connection with employment of migrant workers must be covered by Hansen. Hansen must not require the worker to surrender identification documents. Workers employed through a third party agent or contractors are the responsibility of that supplier, and are thus covered by these Minimum Standards.</p>
Hiring and regular employment	<p>Hansen must provide each worker with a clear, understandable labour contract containing all legally required employment terms, entitlements and conditions. Hansen will not engage in any deceptive recruiting practices whereby workers may be falsely informed of their employment terms, entitlements or conditions.</p>

## Appendix 2: Definitions

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1. **Child** (or **Children**) means a person under the age of 15, or below the age at which school attendance is not compulsory under local law, whichever is older;
2. **Young Person** means as a person under the age of 18 but not classified as a child;
3. **Act** has the meaning given to the term in section 2;
4. **Bonded Labour** means work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange;
5. **Child Labour** means any work by a child or young person, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to interfere with that person's education, or to be harmful to that person's health or mental, spiritual, moral or social development;
6. **Forced Labour** means the circumstance where any work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person;
7. **Group** has the meaning given to the term in section 1;
8. **Hansen** has the meaning given to the term in section 1;
9. **ILO** means the International Labour Organisation;
10. **Indentured Labour** means the circumstance where an employer forbids workers from leaving employment at the worker's discretion;
11. **Minimum Standards** means the standards set out in Appendix 1 to this Policy;
12. **Modern Slavery** has the meaning given to the term under the Act as summarized in section 4 of this Policy;
13. **Policy** has the meaning given to the term in section 1; and
14. **Principles of Remediation** means a program enabling children and under age workers to return to quality education and establish and implement effective systems to prevent the use of Child Labour in the future.