



**Version 1**

# **Human Rights Policy**

**Global**

(Previously Modern Slavery Policy)

**June 2024**



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**PROPRIETARY INFORMATION**

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## 1. Introduction

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.

This Human Rights Policy (“Policy”) has been put in place to ensure that Hansen’s employees, contractors, suppliers, and other business partners respect and promote human rights, and contribute toward eradicating modern slavery. It has 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.

Capitalised terms in this Policy are defined in Appendix C.

## 2. Purpose

Hansen recognises and respects the human rights of every person involved in our operations, supply chain and communities in which we operate. We are committed to acting ethically and with integrity and ensuring that all people are treated fairly, ethically and with respect.

Hansen commits itself, at a minimum, to comply with and be guided by, the following international human rights standards, as further elaborated upon in Appendix B:

- Rights and freedoms set out in the Universal Declaration of Human Rights
- The International Covenant on Economic, Social and Cultural Rights
- The International Labour Organisation’s (“ILO”) Core Conventions
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Decent Work Agenda
- United Nations Guiding Principles on Business and Human Rights; and
- Organisation for Economic Cooperation and Development (“OECD”) Guidelines for Multinational Enterprises.

Where there are differences in the laws and regulations of the countries in which we operate and those standards described above, then Hansen will apply the higher standard.

As a reflection of our values, we expect all our contractors, suppliers and business partners to share our commitment to upholding human rights, and, at a minimum, comply with local laws and regulations in the countries in which they operate, and internationally recognised human rights standards (and where differences exist between internationally recognised human rights standards and local rules or regulations, applying the higher standard).

### 3. Scope

This Policy, and the commitments contained within, applies to Hansen and related entities and our employees, contractors, suppliers, and any other relevant business partners.

This Policy applies at all times and is not restricted by work hours or other time and place considerations. No part of this policy seeks to exclude any existing policies, commitments, or obligations of Hansen including under relevant laws.

In relation specifically to Hansen employees, 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).

### 4. Policy Principles

Across our global business we have identified key human rights areas that are a focus for our business. We are committed to promoting decent working conditions and respect human rights across the following key focus areas and principles. However, we recognise that other human rights may become a priority over time, and we will regularly review our focus areas.

#### Labour rights:

Hansen is committed to respecting, promoting and upholding labour rights and decent working conditions in our operations and supply chain, in accordance with the ILO Fundamental Conventions, ILO's Decent Work Agenda and compliance with the Australian Modern Slavery Act 2018 (Cth) ("Act"), and other comparable modern slavery acts globally. This includes ensuring that the following principles are upheld:

- Rejection of all forms of modern slavery, including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.
- All employment is freely chosen.
- Employment is subject to the minimum legal working age based on the relevant laws in the countries of operations, or in the absence of such law, by the International Labour Organisation Convention 138.
- We do not engage in any deceptive recruiting practices whereby workers may be falsely informed of their employment terms, entitlements, or conditions.
- All workers are free to exercise their right to form and/or join trade unions and bargain collectively and exercise their right to freedom of expression.
- Provide a safe and healthy working environment for all workers, and ensure workers have the right to refuse work that is unsafe.
- Workers have the right to a living wage and fair remuneration (legally mandated wage or industry benchmark, including equal pay for equal work), as well as clear and understandable employment contracts for each person.

- Workers have the right to fair and equal treatment and access to opportunity, and enjoy a workplace that is free from discrimination, harassment, intimidation, or coercion, as set out in our Code of Conduct.
- 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.

### **Diversity, Equity and Inclusion:**

Hansen is committed to being an inclusive employer, promoting and valuing diversity within our workforce, and among our customers and suppliers. In line with our Code of Conduct, Hansen is committed to ensuring that our diversity, equity and inclusion principles extend to recruitment, hiring, training, promotions, procurement, and day-to-day operations.

We are committed to promoting a work environment that is free from discrimination, harassment, and bullying. This includes a zero-tolerance approach to discrimination on the basis of race, color, gender identity, sexual orientation, religion, national origin, disability, or any other protected status.

Hansen will set appropriate targets to report on and monitor progress of our Diversity, Equity and Inclusion strategy.

### **Indigenous Rights:**

Hansen is committed to respecting the rights of all Indigenous peoples. We acknowledge the UN Declaration on the Rights of Indigenous peoples and are committed to applying its principles in advancing the rights of Aboriginal and Torres Strait Islander peoples.

### **Privacy and Business Ethics:**

Hansen is committed to respecting the right to privacy of our people, customers, suppliers, and other stakeholders. We collect, hold, and handle personal information in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth) and are committed to providing grievance processes to all stakeholders without fear of reprisal. Our Privacy Policy sets out how Hansen handles personal information.

In addition, Hansen has a zero tolerance of bribery and corruption in our business in any form, as outlined in our Code of Conduct.

### **Health, Safety and the Environment:**

Hansen is committed to promoting and protecting the physical and mental health of our people, including providing a safe workplace and promoting wellbeing.

The right safety, and the right to a clean, healthy, and sustainable environment are also fundamental human rights. Hansen is committed to demonstrating responsible business practices through adherence to relevant ethical, safety and environmental standards. We also aim to promote and protecting the physical and mental health of our people, including providing a safe workplace and promoting wellbeing.

Hansen aims to maintain below industry standard for health and safety metrics including Lost Time Injury Frequency Rate (“LTIFR”) and Total Recordable Injury Frequency Rate (“TRIFR”).

We expect our contractors, suppliers, and any other relevant business partners to uphold the same commitments.

## 5. Minimum Standards

Hansen’s minimum standards in relation to modern slavery are set out in Appendix A, and Hansen’s minimum standards in relation to human rights are set out in Appendix B to this Policy, respectively, and are collectively referred to as the **Minimum Standards**. All Hansen employees, contractors, suppliers, and any other relevant business partners are expected to comply with the Minimum Standards.

## 6. Reporting and Complaints

Reporting non-compliance is an important part of identifying and mitigating misconduct and harm across Hansen’s operations and supply chain. We encourage individuals to report an issue if they believe that there are potential human rights concerns (including modern slavery) within Hansen or its supply chains, or any actual or suspected non-compliance to the Minimum Standards. This can be done via Hansen’s Complaint & Grievance policy or the Whistleblower Policy. Individuals can also raise complaints or concerns directly with their manager or HR representative without fear of retaliation, intimidation, harassment, discrimination or victimization.

ATO encourages whistleblowers to come forward with their concerns and protect them when they do, the Corporations Act 2001 (Corporations Act) gives certain people legal rights and protections as whistleblowers. Hansen will treat all reports in a confidential manner and anonymously in accordance with Hansen’s Whistleblower Policy. Hansen’s 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.

### How to make a report:

In alignment with Hansen’s Complaint & Grievance Policy and the Whistleblower Policy, concerns relating to potential instances of human rights abuses (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

Concerns could also be raised by post to Level 13, 31 Queen Street, Melbourne, Victoria 3004, Australia (marked to the attention of the Chair of the Audit & Risk Committee).

## Remediation:

As stated in the Complaint & Grievance Policy and the Whistleblower Policy, following a report, Hansen shall further investigate the risk, and assess whether there are any violations to remediate. Where appropriate, Hansen will provide feedback to the individual regarding Hansen's investigation.

Hansen maintains records of complaints or grievances that have gone through formal resolution, including the actions taken and resolutions reached. In some countries, an employee must consent to the records being retained.

## 7. Breach of this Policy

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

## 8. Communication

This Policy will be publicly available on the Hansen website. It will be internally communicated to all existing Hansen employees, contractors, suppliers, and any other relevant business partners. It will also be provided to all new Hansen personnel at the on-boarding or procurement stage.

## 9. Monitoring and Continuous Improvement

This Policy is managed by the Legal Team.

Regular review of this Policy will occur annually to ensure continuous improvement to reflect changing regulations and good industry practices.

Activities related to the physical administration of this Policy will be undertaken by the Administration and IT services leads in each of our offices globally.

Communication of the Policy will be undertaken by the Legal Team.

*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 3 June 2024.*



## Appendix A: 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</b>, <b>Bonded Labour</b> or <b>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. This includes ensuring that all employees and any staff in our supply chain are paid a <b>Living Wage</b>, provided adequate working conditions, and can raise any concerns via our whistle-blower policies. 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 and anonymously.</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 B: International Human Rights Standards

### Universal Declaration of Human Rights:

An international document that sets out the basic rights and fundamental freedoms to be universally protected.

### International Covenant on Civil and Political Rights

An international human rights treaty that provides protections for a range of rights including:

- Freedom from torture and other cruel, inhuman or degrading treatment or punishment
- Fair trial rights
- Freedom of thought, religion and expression
- Privacy, home and family life
- Equality and non-discrimination.

### International Covenant on Economic, Social and Cultural Rights:

An international human rights treaty that aims to protect economic, social and cultural rights including the right to:

- Education
- Fair and just conditions of work
- An adequate standard of living
- The highest attainable standard of health
- Social security.

### International Labour Organisation's Core Conventions:

Refers to a set of eight fundamental conventions covering a wide area of social and labour issues including basic human rights, minimum wages, industrial relations, employment policy, social dialogue, social security and other issues. These conventions are legally binding for member states that have ratified them.

### International Labour Organisation's Declaration on Fundamental Principles and Rights at Work:

A broader document adopted in 1998, reaffirming the commitment of member states to uphold certain fundamental labour standards, even if they have not ratified the specific Core Conventions. It encompasses four core principle: freedom of association and collective bargaining, the elimination of forced labour, the abolition child labour, and the elimination of discrimination in employment and occupation.

### **ILO Decent Work Agenda:**

The ILO has developed an agenda for the community of work looking at job creation, rights at work, social protection and social dialogue, with gender equality as a cross cutting objective. The ILO Framework Decent Work Indicators cover ten substantive elements corresponding to four strategic pillars of the Decent Work Agenda (full and productive employment, rights at work, social protection and the promotion of social dialogue), as following:

- Employment opportunities
- Adequate earnings and productive work
- Decent working time
- Combining work, family and personal life
- Work that should be abolished
- Stability and security of work
- Equal opportunity and treatment in employment
- Safe work environment
- Social security
- Social dialogue, employers' and workers' representation

### **United Nations Guiding Principles on Business and Human Rights:**

The UNGPs are the global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activity, and they provide the internationally accepted framework for enhancing standards and practices with regard to business and human rights.

### **OECD (Organisation for Economic Co-Operation and Development) Guidelines for Multinational Enterprises:**

A set of recommendations providing voluntary principles and standards for responsible business conduct by multinational enterprises. These guidelines cover various areas such as employment and industrial relations, human rights, environment, bribery and corruption, consumer interests and more. The guidelines provide a framework for organisations to conduct operations in a manner that respects and promotes human rights, both within their own operations and throughout supply chains and business relationships.

## Appendix C: Definitions

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. **Act** has the meaning given to the term in section 4;
3. **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;
4. **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;
5. **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;
6. **Group** has the meaning given to the term in section 1;
7. **Hansen** has the meaning given to the term in section 1;
8. **ILO** means the International Labour Organisation;
9. **International Human Rights Standards** refer to the universally recognised principles and norms for safeguarding the inherent dignity and rights of all individuals, regardless of race, ethnicity, gender, religion, nationality or other status. These standards are articulated in Appendix B to this Policy;
10. **Indentured Labour** means the circumstance where an employer forbids workers from leaving employment at the worker's discretion;
11. **Living Wage** means providing sufficient income for a worker to cover basic needs like food, housing, healthcare, education, and transport, plus some discretionary income. It should be enough for a decent standard of living and adjusted for local costs.
12. **Lost Time Injury Frequency Rate** measures the number of lost-time injuries per million hours worked during a single financial year.
13. **Minimum Standards** has the meaning ascribed the term in section 5;
14. **Modern Slavery** has the meaning given to the term under the Act;
15. **Policy** has the meaning given to the term in section 1;
16. **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.
17. **Total Recordable Injury Frequency Rate** is the number of fatalities, lost time injuries substitute work and other injuries requiring treatment by a medical professional per million hours worked.
18. **Young Person** means as a person under the age of 18 but not classified as a child

# Policy Review Log

Version:	Date of review:	Description of changes made:	Approved by:
1	May 2024	Updated from Modern Slavery Policy to Human Rights Policy	Board & Chief Legal Council