



# **Joint Modern Slavery Statement**

9 December 2024



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**PROPRIETARY INFORMATION**

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# 1. Introduction

This is the fifth Modern Slavery Statement (**Statement**) for Hansen Technologies Limited (ACN 090 996 455), an Australian public company listed on the Australian Securities Exchange (ASX: HSN). This Statement has been published in accordance with the Australian *Modern Slavery Act 2018* (Cth) (**Australian Modern Slavery Act**), the United Kingdom's *Modern Slavery Act 2015* (UK) (**UK Modern Slavery Act**), and the *Norwegian Act on business transparency and work with basic human rights and decent working conditions 1 July 2022* (**Norwegian Transparency Act**). The Statement identifies the steps taken, and approach adopted, by Hansen Technologies Limited and other relevant group companies, including each wholly-owned entity or Hansen Technologies Limited and any entity under the control of Hansen Technologies Limited (**Hansen, we, our or us**) during the period from 1 July 2023 to 30 June 2024 to ensure that we have implemented the necessary framework and processes to minimise the risk of modern slavery in our business operations and across our supply chain. As entities within our group use the same policies and processes, operate in the same sector and have many shared suppliers, this Statement is a joint statement, and has been prepared to provide a single and consolidated description of our actions to address modern slavery risks.

The following Hansen entities are considered reporting entities under the Australian Modern Slavery Act –

- Hansen Technologies Limited
- Hansen Corporation Pty Ltd

The following Hansen entities are considered reporting entities under the Norwegian Transparency Act, and for the specific statement required under that Act, please refer to Annexure 2 –

- Hansen Technologies Norway AS

Additionally, whilst there are no Hansen entities that are obligated to report under the UK Modern Slavery Act, Hansen does so on a voluntary basis.

Hansen encourages its people and suppliers to not only comply with laws and regulations but also to go beyond to uphold the human rights of everyone connected to its operations and supply chains. To this end, Hansen strives to adhere to the highest ethical standards and integrity, affirming its commitment to the Universal Declaration of Human Rights, the International Covenants on Civil and Political Rights, and on Economic, Social, and Cultural Rights, along with the Core Conventions of the International Labour Organization (ILO) and its Declaration on Fundamental Principles and Rights at Work. Additionally, Hansen endeavours to align its practices with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises, seeking compliance across all areas of its business.

## 2. Our Structure, Operations and Supply Chains

### Our Structure and Operations

Hansen is a leading global provider of software and services to the energy, water and communications industries. With its award-winning software portfolio, Hansen serves customers in over 80 countries, helping them to create, sell, and deliver new products and services, manage and analyse customer data, and control critical revenue management and customer support processes. Our services include software development services, IT technology consulting services, and data centre operation services.

Hansen owns a range of entities operating in the technology industry, providing different types of software products for telecommunications, media, high-tech companies and for the energy sector. These entities comprise of both companies incorporated in Australia and overseas, including New Zealand, Canada, , Vietnam, Denmark, Finland, India, South Africa, the United Kingdom and the United States. Collectively, Hansen and its related entities employ nearly 2,000 employees working across the globe, from our offices in North and South America, South Africa, Europe and the Asia Pacific region.

A full list of entities that Hansen owns and controls is set out in Hansen's 2024 Annual Report, which is available on Hansen's website. Further information about our structure and operations can be found on our official website.

### Our Supply Chains

As an IT services company, we have relationships with suppliers in each of the countries where we operate. These suppliers provide technological goods and services to our business, including the provision of servers and equipment used by our employees and in our data centres, office cleaning services, office consumables, and leasing services. Services arrangements with these suppliers are generally in the form of stable longer-term contractual relationships, and given the nature of these services, our suppliers are sourced locally.

## 3. Identifying Risks

### Assessing the risks of modern slavery

In accordance with the Australian Modern Slavery Act, the UK Modern Slavery Act, and the Norwegian Transparency Act, Hansen has taken steps to identify and assess risks of modern slavery in our operations and supply chains. These include reviewing existing information about Hansen and its related entities' operations and supply chains, mapping out our entire global supply chain and determining the areas where there may be a higher risk. Our methodology for assessing risk took into account such factors as the nature of the services being provided, geographic location of such services, the propensity of the likelihood of modern slavery in relation to those services, and whether there were any general indicators of modern

slavery with those suppliers. We then prioritised the higher risk areas in order to perform further due diligence into potential modern slavery practices, using the methodology set out below.

## Results

From the assessment mentioned above, we have made the following observations. First, given the nature of our services and having considered the hiring practices and employment terms adopted by Hansen, Hansen's internal employee operations were identified as little to no risk. Hansen identified that the higher risks areas were suppliers to Hansen who provide physical services such as cleaning and security services. The following were identified as the highest risk sectors of our operations:

Geographic Location	Sectors and Industries at Highest Risk	Modern Slavery Risk/Indicators of Modern Slavery
Australia and New Zealand	<ul style="list-style-type: none"> <li>Physical services (cleaning, catering, and security services)</li> <li>Recruitment strategies by suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Forced / bonded labour</li> <li>Excessive working hours</li> <li>Underpayment of wages</li> </ul>
Canada and United States	<ul style="list-style-type: none"> <li>Physical services (cleaning, catering, and security services)</li> <li>Recruitment strategies by suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Forced / bonded labour</li> <li>Excessive working hours</li> <li>Underpayment of wages</li> <li>Exploitation of migrant workers</li> </ul>
Central and Latin America	<ul style="list-style-type: none"> <li>Physical services (cleaning, catering, and security services)</li> <li>Recruitment strategies by suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Forced / bonded labour</li> <li>Underpayment of wages</li> <li>Exploitation of migrant workers</li> <li>Deceptive recruitment</li> </ul>
Europe and the United Kingdom	<ul style="list-style-type: none"> <li>Physical services (cleaning, catering, and security services)</li> <li>Recruitment strategies by suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Forced / bonded labour</li> <li>Excessive working hours</li> <li>Underpayment of wages</li> <li>Exploitation of migrant workers</li> </ul>
South Africa	<ul style="list-style-type: none"> <li>Physical services (cleaning, catering, and security services)</li> <li>Recruitment strategies by suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Forced / bonded labour</li> <li>Excessive working hours</li> <li>Underpayment of wages</li> <li>Exploitation of migrant workers</li> </ul>

Geographic Location	Sectors and Industries at Highest Risk	Modern Slavery Risk/Indicators of Modern Slavery
India	<ul style="list-style-type: none"> <li>• Physical services (cleaning, catering, and security services)</li> <li>• Recruitment strategies by suppliers</li> </ul>	<ul style="list-style-type: none"> <li>• Forced / bonded labour</li> <li>• Deceptive recruitment</li> <li>• Excessive working hours</li> <li>• Underpayment of wages</li> <li>• Exploitation of migrant workers</li> </ul>
Vietnam	<ul style="list-style-type: none"> <li>• Physical services (cleaning, catering, and security services)</li> <li>• Recruitment strategies by suppliers</li> </ul>	<ul style="list-style-type: none"> <li>• Forced labour</li> <li>• Deceptive recruitment</li> <li>• Exploitation of migrant workers</li> <li>• Excessive working hours</li> <li>• Underpayment of wages</li> </ul>

## 4. Risk Mitigation and Remediation – Our Approach

### Hansen’s policies and processes

Hansen is dedicated to recognising and upholding the human rights of everyone connected to our operations, supply chains, and the communities where we are active. Hansen has in place many formal policies to ensure our high standards of ethical conduct and legal compliance. In FY24 we significantly enhanced our Human Rights Policy which sets the Minimum Standards (**Minimum Standards**) for all Hansen employees, contractors, suppliers, and business partners, emphasising our collective responsibility, and is made available on our website. These Minimum Standards include a prohibition of any type of forced, bonded or indentured labour and a commitment that Hansen, its related entities and suppliers comply with the minimum legal working age in the relevant country or in the absence of such law, by the International Labour Organisation Convention 138 (the **Minimum Age Convention**). It also includes a requirement of compliance, at a minimum, with all laws regulating local wages, overtime compensation and legally mandated benefits. This includes ensuring all employees and any staff in our supply chain are paid a living wage.

In FY24 we also formally launched our enhanced Supplier Code of Conduct which sets out minimum standards that Hansen requires our suppliers to meet in relation to labour and human rights — including modern slavery laws, business integrity, health and safety, environment, data privacy, and cyber security. The minimum standards for labour and human rights within the Supplier Code of Conduct reflect the Minimum Standards articulated in our Human Rights policy.

In addition to identifying any new service suppliers where there may be a higher risk of modern slavery in order to perform any further due diligence during this reporting period, Hansen has also contacted any previously identified suppliers, and our major IT partners to affirm their commitment to our Supplier Code of Conduct. This cohort represents approximately 70% of our material suppliers by spend.

As part of our procurement process, we perform due diligence to confirm that new suppliers conform with the Minimum Standards. For existing suppliers, we implement a risk-based approach to ensure conformance with our Minimum Standards. This approach is as follows:

1. determining whether the supplier has a pre-existing modern slavery policy or a human rights policy covering its operations;
2. where necessary, performing the assessment described in section 3 to assess the risks;
3. where necessary, communicating our Minimum Standards to the supplier and gaining acknowledgments of compliance with our Supplier Code of Conduct (which includes the Human Rights Policy and the Minimum Standards incorporated within the Human Rights Policy), and;
4. where necessary, taking further steps to ensure that the supplier conforms with the Minimum Standards.

In relation to new suppliers, Hansen's procurement contracts include provisions that incorporate Hansen's Human Rights policy and Hansen's Supplier Code of Conduct, and ensures that the supplier (and its suppliers) are obligated to comply with the Minimum Standards.

Suppliers' ability to meet or exceed the standards set out in our Supplier Code of Conduct is a key consideration when Hansen makes procurement decisions, and it is an ongoing condition for doing business with Hansen. Failure to comply can result in Hansen seeking alternative suppliers.

Hansen also conducts regular employee training to ensure that its employees are aware of, and understand their ethical and legal obligations. For the FY24 reporting period, 100% of our employees were up to date with our Human Rights training. They are also made aware of our internal reporting mechanisms in order to report any actual or suspected non-compliance with the Minimum Standards by Hansen or our suppliers. Our Whistleblower Policy and Complaint & Grievance Policy provide avenues to employees, contractors and related parties across our operations and supply chain, to raise concerns and voice grievances. Our Whistleblower Policy is made available on our website.



## 5. Effectiveness of Actions

Hansen appreciates the importance of assessing the effectiveness of the actions we are taking to identify and address modern slavery risks. We have implemented several tools to ensure that our actions are working, including those set out in the table below.

Tool	Activity	Measurement of Effectiveness
Governance	<ul style="list-style-type: none"> <li>• Policy reviews</li> <li>• Supplier contracts requiring modern slavery compliance</li> <li>• Team member training</li> </ul>	<ul style="list-style-type: none"> <li>• Completed policy reviews in a timely manner</li> <li>• % of high risk suppliers agreeing to the Minimum Standards</li> <li>• % of team trained</li> </ul>
Risk Management	<ul style="list-style-type: none"> <li>• Annual supply chain data disclosure and risk assessments</li> <li>• Identifying trends from risk data</li> </ul>	<ul style="list-style-type: none"> <li>• Number of identified risks</li> <li>• Performance of annual risk assessments by geographical locations and services</li> </ul>
Grievances mechanisms	<ul style="list-style-type: none"> <li>• Cases remediated</li> <li>• Identifying trends from grievance data</li> </ul>	<ul style="list-style-type: none"> <li>• Total number of issues raised</li> <li>• Channel through which issues were raised</li> <li>• Remedy for affected persons</li> </ul>

## 6. Consultation with related entities

All entities that Hansen owns or controls operate under a common set of policies and programs, including the Whistleblower Policy and the Human Rights Policy. The risk identification and assessment process referred to in part 3 and the drafting of this statement were carried out in consultation and collaboration across the Hansen Group. This included engagement with members of the Executive Leadership Team of each entity.

## 7. Our Ongoing Commitment

Hansen has implemented an ongoing process of identifying and assessing areas of our business where there may be a higher risk of non-compliance with the Minimum Standards, to then further investigate and remediate appropriately. Where any possible non-compliance of the Minimum Standards has been identified, then Hansen shall further investigate the risk, and assess whether there are any violations and remediate.

Hansen has incorporated the Minimum Standards into our new supplier agreements, to also ensure that appropriate due diligence is performed for any new supplier engagement.

Given the nature of Hansen’s business, and the low risk of modern slavery in our supply chains, Hansen will continue to perform due diligence in the same manner as performed this year, ensuring suppliers comply with our Supplier Code of Conduct.

## Board approval

This statement was approved by the Board of Hansen Technologies Limited on behalf of Hansen Technologies Limited and Hansen Corporation Pty Ltd (as reporting entities) at its board meeting on 28 November 2024.



David Trude

Chairman

9 December 2024

## Annexure 1

This Statement was prepared in accordance with the mandatory criteria for modern slavery statements set out in section 16 of the Australian Modern Slavery Act, the recommended reporting criteria set out in section 54 of the of the UK Modern Slavery Act, and the reporting criteria set out in the Norwegian Transparency Act section 5.

The table below outlines where each criterion can be found.

Mandatory criteria for Australian Modern Slavery Statement	Recommended reporting criteria for UK Modern Slavery Statement	Criteria set out in the Norwegian Transparency Act	Location of Information in this Statement
Identify of the reporting entity	N/A	N/A	Introduction (part 1)
Describe the reporting entity's structure, operations and supply chains	Organisation's structure, it's business and its supply chains	Describe the entity's organisation, operation, policies and procedures related to human rights and decent working conditions	Our structure, operations and supply chain (part 2)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Parts of the organization's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	Information on actual negative consequences and significant risk of negative consequences that the enterprise has uncovered through its due diligence assessments.	Identifying risks (part 3)
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Organization's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff	Information about planned or implemented measures to stop or limit actual (or risk of) negative consequences	Risk Mitigation and Remediation – Our Approach (part 4)

Describe how the reporting entity assess the effectiveness of such actions	Organization's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Description of the results of the implemented measures to stop or limit actual (or risk of) negative consequences	Effectiveness of actions (part 5)
Describe the process of consultation with any entities that the reporting entity owns or controls	N/A	N/A	Consultation with related entities (part 6)
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	N/A	N/A	Our ongoing commitment (part 7)

## Annexure 2

### HANSEN TECHNOLOGIES NORWAY AS – NORWEGIAN TRANSPARENCY ACT – INTERNAL GUIDELINES

The Norwegian Transparency Act entered into force from 1 July 2022. The law is intended to strengthen the impact of international guidelines and principles for responsible business, such as the UN's guiding principles for business and human rights and the OECD's guidelines for multinational companies.

The Norwegian Transparency Act promote companies' respect for human rights and decent working conditions in connection with the production of goods and services.

As part of the Hansen Technologies Group (the "Group" or "Hansen"), Hansen Technologies Norway AS has for many years been subject to the Group's Human Rights Policy (the "Policy") that has been put in place to ensure that Hansen and its employees respect and promote human rights, and contribute toward eradicating modern slavery. A copy of the Policy can be found on Hansen's website.

Hansen Technologies Norway AS' obligations pursuant to the Norwegian Transparency Act is carried out pursuant to the Policy, and also pursuant to Hansen's annual Modern Slavery Statement, to which this guideline is attached as Annexure 2.

#### 1 NORWEGIAN TRANSPARENCY ACT OBLIGATIONS

The Norwegian Transparency Act imposes three main obligations on companies:

- Carry out due diligence assessments
- Account for due diligence assessments
- Respond to requests for information

##### 1.1 Duty to carry out the due diligence assessment

The core of the Norwegian Transparency Act is the duty of businesses to carry out a due diligence assessment of basic human rights and decent working conditions in line with the OECD's guidelines for multinational companies.

Pursuant to the Clause 7 of Hansen's Modern Slavery Statement (Ongoing Modern Slavery commitment), we have an ongoing process of identifying and assessing areas of our business where there may be a higher risk that there is non-compliance with our Minimum Standards (as set out in the Policy). The process ensured that we investigate and remediate appropriately.

Hansen's process for due diligence assessment makes sure we survey, assess, prevent and limit possible negative impact on basic human rights and decent work. Hansen's due diligence assessment includes an assessment of the Hansen's own operations, supply chains and business partners.

We update Hansen's supply chain mapping regularly in order to mitigate risk and to have a good 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 are recorded and reported to the responsible officer.

## 1.2 Duty to account for due diligence assessments

Hansen publishes its Modern Slavery Statement annually, where we provide relevant information that Hansen has become aware of through its due diligence assessments.

Hansen's Modern Slavery Statement gives the general public access to information about Hansen's due diligence assessments and the results of these.

Our Modern Slavery Statement is available on the Group's website.

## 1.3 Requests for information

In addition to publishing our Modern Slavery Statement, Hansen will also respond to written requests from the Norwegian general public about how the Group handles actual and potential negative consequences that are uncovered in the due diligence assessment.

Such requests may be sent to:

Julia Chand, General Counsel

Email: [Julia.Chand@hansencx.com](mailto:Julia.Chand@hansencx.com)

These Internal Guidelines have been approved and adopted by the board of directors of Hansen Technology Norway AS.

9 December 2024



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Andrew Hansen, Chairman of the Board



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