



## Modern Slavery Policy

Hanlon Industries is dedicated to maintaining ethical, socially responsible business practices in line with the highest standards of integrity. We acknowledge the significant global issue of modern slavery and human trafficking and commit to actively preventing and addressing these practices across our operations and supply chain. This policy defines Hanlon Industries zero-tolerance approach toward modern slavery and human trafficking, ensuring our commitment to a workplace free from exploitation.

### Scope and Applicability

This policy applies to all Hanlon Industries employees, contractors, suppliers, and partners. It outlines our stance and expectations for upholding human rights and preventing modern slavery at all operational levels, including manufacturing, sourcing and procurement activities.

### Commitment to Ethical Labor Practices

Hanlon Industries views respect for human rights as fundamental to our business. We are committed to upholding labour standards that protect human dignity, ensure fair wages, and provide safe working conditions. Employees are empowered to report concerns about unethical practices, including human trafficking, without fear of retaliation.

### Definitions of Modern Slavery

Modern slavery deprives individuals of their freedom for commercial gain, violating fundamental human rights. It includes:

- Human Trafficking: Recruitment, transportation, or harboring of individuals through force or coercion.
- Forced Labor: Compelling someone to work against their will under threat or duress.
- Debt Bondage: Holding individuals to work to pay off a debt that is unreasonably high or cannot be paid off.
- Forced Marriage: Marriages conducted without free and full consent.
- Child Labor: The exploitation of children in work that is harmful to their health, education, or development.

### Indicators of Modern Slavery

Employees should be aware of potential indicators, which may include:

- Lack of personal control over identification documents.
- Limited social interactions or restricted freedom of movement.
- Signs of physical abuse or distress.
- Poor living conditions or lack of access to finances.
- Unusual financial arrangements or significant debt burdens.

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## Responsibilities Across the Organisation

Hanlon Industries commits to involving all employees in our mission to prevent modern slavery. Each department, including Procurement, Human Resources, Finance, and Legal, has a role in upholding this policy:

- **Employees:** Report any concerns or red flags immediately through designated reporting channels.
- **Managers:** Remain vigilant, support employees in reporting, and ensure departmental compliance.
- **Suppliers and Contractors:** Adhere to our ethical standards and implement modern slavery prevention measures within their operations.

## Reporting Mechanism and Confidentiality

Hanlon Industries provides a secure, confidential reporting system for employees and stakeholders to report concerns related to modern slavery. Reports can be made anonymously if preferred, and all information will be treated with strict confidentiality. In cases of immediate risk, individuals are advised to contact local authorities directly.

## Supply Chain Accountability

We recognise our responsibility to extend ethical practices beyond our operations. We conduct due diligence with suppliers and partners to identify risks related to modern slavery and require that they meet our standards for ethical labor practices. Suppliers unable to demonstrate this commitment or failing to address issues of concern risk termination of the business relationship.

## Risk Assessment and Due Diligence

Hanlon Industries commits to actively assessing and managing risks related to modern slavery in our supply chain. We undertake a thorough review of our suppliers and contractors to identify potential risks and engage with stakeholders to ensure alignment with our ethical standards.

## Training and Awareness

We are dedicated to providing regular training for all employees, empowering them to recognise the risks and signs of modern slavery and human trafficking. This education ensures that our workforce is vigilant and actively participates in our commitment to preventing exploitation.



### **Monitoring, Evaluation, and Continuous Improvement**

To ensure effectiveness, we will conduct annual reviews of this policy, assessing its implementation and outcomes. The senior management team oversees compliance and regularly evaluates the policy's effectiveness, making updates as needed. Employee and stakeholder feedback is encouraged to support continuous improvement.

### **Commitment to Legislative Compliance**

Hanlon Industries complies with Australia's Modern Slavery Act 2018 and strives to set an industry example for ethical business practices. This policy aligns with national and international human rights standards, ensuring responsible, sustainable business operations.

### **Access to Policy and Contact Information**

This policy, along with any updates, is accessible to all employees and stakeholders. For any concerns or inquiries, please contact our designated representative; Jessica Harding, Head of People and Marketing [ [jess.h@hanlonindustries.com.au](mailto:jess.h@hanlonindustries.com.au) ]. Additionally, for urgent matters, employees should reach out to the appropriate local authorities.

### **Commitment**

Hanlon Industries stands firm in its commitment to eradicating modern slavery and human trafficking. By embedding this policy into our core values, we are fostering a respectful, ethical workplace where human rights are upheld, and exploitation is absent. Together, we are building a responsible and sustainable future for our industry and society.