

# Modern Slavery Policy (Australia)

## 1. PURPOSE AND CONTEXT

Modern Slavery is a crime and violation of human rights, as defined below. ASSA ABLOY takes this very seriously and has zero tolerance towards Modern Slavery.

This policy documents key requirements ASSA ABLOY businesses in Australia apply to employees and suppliers in order to try and prevent Modern Slavery practices, and is to be read in conjunction with ASSA ABLOY’s Code of Conduct documents for employees and Business Partners.

The administration and enforcement of this policy by ASSA ABLOY businesses in Australia is assisted by the work of ASSA ABLOY’s Modern Slavery Review Council, which consists of senior management of all the relevant Australian entities. The Council holds regular meetings to assess modern slavery related risks, take remediation actions to manage and address any potential Modern Slavery-related issues in its supply chain and operations, and assess the effectiveness of the related processes.

## 2. SCOPE

This policy applies to all persons working for or on behalf of, or providing services to, ASSA ABLOY businesses in Australia in any capacity, including all Suppliers, employees, directors, officers, agency workers, contractors, consultants, and any other third-party representatives (**‘Parties’**).

## 3. INTERPRETATION AND DEFINITIONS

**ASSA ABLOY** means ASSA ABLOY Australia Pacific Pty Limited (ACN 095 354 582) and all its Related Bodies Corporate that are incorporated in Australia.

**Associated Entities** has the meaning given to it by section 50AAA of the Corporations Act 2001 (Cth).

**Criminal Code** means the Criminal Code Act 1995 (Cth).

**Modern Slavery** means those matters defined in Paragraph 4 of this policy or otherwise defined as ‘modern slavery’ in any Modern Slavery Legislation, which includes but is not limited to conduct which would constitute:

- a) an offence under Division 270 or 271 of the Criminal Code; or
- b) an offence under either of those Divisions if the conduct took place in Australia; or

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- c) trafficking in persons, as defined in the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; or
- d) the worst forms of child labour, as defined in Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

**Modern Slavery Legislation** means the Modern Slavery Act 2018 (Cth) and all State and Territory modern slavery legislation.

**Related Bodies Corporate** has the meaning given to that term in the Corporations Act 2001 (Cth).

**Suppliers** is defined as any organisation or person who provides ASSA ABLOY with goods or services, including their subcontractors, agents, Associated Entities and consultants.

**Supply Chains** is defined as the products and services (including labour), and the Suppliers of those products and services, that contribute to ASSA ABLOY’s own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct Suppliers.

Note that a reference to legislation in this policy is a reference to that legislation as enacted and/or updated from time to time.

## 4. WHAT IS MODERN SLAVERY AND HOW IS IT ADDRESSED?

Refer to the definition of the term in section 3 of this policy. Without limiting that definition, it is pertinent to note for the purpose of this policy that Modern Slavery includes at least eight serious exploitations which can be summarised as:

- trafficking in persons the recruitment, harbouring and movement of a person for exploitation through modern slavery;
- slavery where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way;
- servitude where the victim’s personal freedom is significantly restricted, and they are not free to stop working or leave their place of work;
- forced labour where the victim is either not free to stop working or not free to leave their place of work;
- forced marriage where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;

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- debt bondage where the victim’s services are pledged as security for a debt and the debt is manifestly excessive or the victim’s services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
- the worst forms of child labour – where children are:
  - exploited through slavery or similar practices, including for sexual exploitation; or
  - engaged in hazardous work which may harm their health, safety or morals; or
  - used to produce or traffic drugs; and
  - deceptive recruiting for labour or services where the victim is deceived about whether they will be exploited through a type of modern slavery.

### ASSA ABLOY’s approach to Modern Slavery

ASSA ABLOY has a zero-tolerance policy in relation to Modern Slavery, and is thereby committed to ensuring Modern Slavery is not present in any form in its business and Supply Chains.

ASSA ABLOY complies with all Australian workplace relations legislation (including but not limited to the Fair Work Act 2009 (Cth)) and provides all employees with at least the minimum guaranteed entitlements of an employee in Australia.

All Parties are expected to comply with this policy and the standards provided therein, and will be provided a copy of this policy as soon as reasonably practicable upon engagement with ASSA ABLOY.

This policy will be used to underpin and inform any statement on Modern Slavery that ASSA ABLOY is required to produce in its compliance with Modern Slavery Legislation.

### ASSA ABLOY’s Supply Chain

ASSA ABLOY expects all Suppliers and Supply Chain members to comply with this policy, Modern Slavery Legislation (and any equivalent legislation in the jurisdictions in which they operate or otherwise applicable to them), and ASSA ABLOY’s Code of Conduct for Business Partners.

Suppliers must also comply with all employment-related legislation and provide all employees with at least the minimum guaranteed entitlements applicable to them under law.

Suppliers will be required to complete an ASSA ABLOY modern slavery questionnaire to assist ASSA ABLOY in undertaking an assessment of any risk of Modern Slavery in its Supply Chain.

Suppliers are expected to seek similar information from their suppliers in turn, to ensure that they can accurately complete the ASSA ABLOY Modern Slavery

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Questionnaire and are taking appropriate steps to identify relevant Modern Slavery risks in their own supply chains.

Suppliers are expected to take necessary actions to address identified Modern Slavery risks relating to their business, and cooperate with ASSA ABLOY for related audits or investigations.

Suppliers are required to report any breach of Modern Slavery Legislation, or any identified or suspected instances of Modern Slavery in their own Supply Chain, to ASSA ABLOY immediately.

## ASSA ABLOY Employees

All ASSA ABLOY employees are required to comply with this policy and follow ASSA ABLOY’s values in relation to abolishing Modern Slavery.

Employees are required to advise ASSA ABLOY of any instances or suspected instances of Modern Slavery in ASSA ABLOY’s internal operations and/or Supply Chain.

## 5. BREACHES OF THIS POLICY

Any employee, director or officer of ASSA ABLOY who breaches this policy will be subject to disciplinary action, which may include termination of employment.

Where ASSA ABLOY is made aware that a Party (including any contractor, consultant, third party provider, Supplier or other Supply Chain member may not be acting in a manner consistent with this policy, it will (where reasonable and practical) be provided an opportunity to respond on that matter. If, following such opportunity, ASSA ABLOY is not satisfied with the response or situation, ASSA ABLOY will ordinarily cease involvement with that entity or individual and take any further action it considers appropriate.

## 6. REPORTING CONCERNS OF MODERN SLAVERY

A key part of ASSA ABLOY’s zero tolerance approach to Modern Slavery is enabling all employees/officers/directors, Suppliers, Supply Chain members or any third party (including the public) to speak up when there are reasonable grounds to suspect that ASSA ABLOY, its employees/officers/directors, Suppliers or Supply Chain members are not acting in accordance with Modern Slavery Legislation or this policy.

Reports of instances or suspected instances of Modern Slavery can be made as follows:

- 1. Contacting ASSA ABLOY [here](#);
- 2. Speaking directly to your manager or direct contact at ASSA ABLOY;
- 3. Emailing ASSA ABLOY Compliance at [PNEA.Compliance@assaabloy.com](mailto:PNEA.Compliance@assaabloy.com)

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4. ASSA ABLOY employees can also report anonymously through the WhistleB portal [here](#).

Alternatively, in Australia, the Australian Federal Police ("AFP") is responsible for investigating suspected cases of Modern Slavery and can be contacted on 131 237 or via the AFP's confidential [online form](#). Contact can be made anonymously.

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