

MODERN SLAVERY POLICY AL-KO INTERNATIONAL PTY LIMITED

I. Document Summary

1 Authority

- 1.1 The *Modern Slavery Act 2018* (Cth) (the “**Act**”) has been enacted to address specific concerns in relation to modern slavery, forced labour and human trafficking, and other forms of modern slavery. The Act contains mandatory reporting criteria which reporting entities must address in an annual modern slavery statement. These criteria include a description of the actions taken by businesses to manage the risk of modern slavery in their operations and supply chains.
- 1.2 AL-KO International Pty Limited (**AL-KO**) is obliged to prepare a Modern Slavery Statement pursuant to the Act. AL-KO takes this obligation seriously, and is committed to addressing the risk of Modern Slavery in our business operations or supply chain. Compliance with the Act comprises a part of AL-KO’s commitment to ethics and corporate social responsibility. We are taking steps to identify and address the risk of modern slavery occurring in all aspects of our operations.

2 Statement of Purpose

- 2.1 This Policy outlines our commitment to addressing modern slavery risks within our operations and supply chain.
-

3 Scope and Applicability

- 3.1 In this Policy, “we”, “our”, “us” or “company” means AL-KO and its subsidiaries.
- 3.2 This Policy applies to all AL-KO employees. It also applies to all suppliers, distributors, consultants and business partners of AL-KO (**Business Partners**), and their employees, subcontractors and agents (**Personnel**).
-

4 Commitment

- 4.1 At AL-KO, we are opposed to all forms of modern slavery in our operations and supply chains.
- 4.2 We are committed to taking modern slavery considerations in to account when selecting suppliers and/or business partners. We will only do business with entities who share our values.

5 Effective Date

21st December 2021

II. Document Details

6 What is Modern Slavery?

6.1 Modern slavery is a term used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It is a crime in many jurisdictions and a violation of fundamental human rights.

6.2 It takes various forms, such as:

- (1) **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.
- (2) **Servitude**: where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work and perceive that this situation is without end.
- (3) **Forced or compulsory labour**: where the victim is either not free to stop working or not free to leave their place of work.
- (4) **Debt bondage**: describes situations 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.
- (5) **Forced marriage**: describes situations 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.
- (6) **Deceptive recruiting for labour services**: describes the situations where the victim is deceived about whether they will be exploited through a type of modern slavery.
- (7) **Worst forms of child labour**: is work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that is dangerous and harmful to children and/or interferes with their schooling.
- (8) **Human trafficking**: describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.

7 Policy statement

7.1 AL-KO will seek to assess and address modern slavery risks within our operations and supply chain by adopting the following approach:

- (1) In relation to our operations:
 - (a) seeking to ensure that all of our employees are working of their own free will and in compliance with applicable laws;
 - (b) complying with applicable laws regulating industrial relations;
 - (c) annually assessing our operations for modern slavery risk; and

- (d) training our employees to increase awareness of modern slavery risks in our operations and supply chain.
- (2) In relation to our supply chain:
 - (a) seeking to engage contractors and suppliers who uphold our commitment to address modern slavery risks;
 - (b) wherever possible, requiring our suppliers to agree to comply with our Supplier Code of Conduct and other related policies in relation to their own operations and supply chains;
 - (c) wherever possible, including contractual terms requiring our suppliers to have in place, and maintain, adequate policies, controls, procedures and training designed to prevent, detect, assess, manage and remedy modern slavery in their operations and supply chains; and
- (3) We will engage with persons impacted by modern slavery and work with our suppliers to remedy adverse impacts where we have caused or contributed to the adverse impacts.

8 Compliance with this Policy

- 8.1 Potential indicators of modern slavery, or known or suspected violations of applicable laws, regulations, policies and ethical standards, whether past, current or future, must be reported as soon as possible to Procurement & Materials Planning Manager AUS/NZ or in accordance with our Compliance Reporting and Anti Retaliation Policy. Employees and our Business Partners are encouraged to raise concerns about any possible modern slavery at the earliest possible stage.
- 8.2 AL-KO is committed to ensuring that no one suffers detrimental treatment as a result of reporting their suspicion, even if they turn out to be mistake. Our Compliance Reporting and Anti Retaliation Policy describes these protections further.

9 Governance and Reporting

- 9.1 The Directors are responsible for oversight of this Policy and will review this Policy regularly to ensure that it continues to evolve and reflect community expectations.

10 More information

- 10.1 If there are any questions regarding any aspect of this Policy, please contact our [insert].

11 Related policies and procedures

- 11.1 This Policy is intended to be read in conjunction with:
 - (1) Compliance Reporting and Anti-Retaliation Policy
 - (2) Supplier Code of Conduct and Ethics
 - (3) DexKo Anti-Corruption Policy
 - (4) DexKo Code of Conduct and Ethics Policy