

May, 2024

Modern Slavery Policy

Purpose

Modern Slavery is a crime and violation of human rights and is defined under the Australian Modern Slavery Act 2018 (the Act) as including eight types of serious exploitation:

- trafficking in persons
- slavery
- servitude
- forced marriage
- forced labour
- debt bondage
- deceptive recruiting for labour or services, and the worst forms of child labour or similar practices or engaged in hazardous work

The purpose of this Policy is to:

- prevent, detect and respond with mitigating controls to the risk of Modern Slavery occurring within Headland Technology, its supply chain or in any other business relationships;
- demonstrate our commitment to only doing business with those who fully comply with the Act; and
- ensure compliance with the Act (as may be amended from time to time).

Scope

This policy applies to all persons working for and with Headland or on its behalf in any capacity, including employees, directors, officers, volunteers, interns, external consultants, third-party representatives and business partners.

Policy Statement

Headland has a zero-tolerance approach to Modern Slavery.

Enabling Innovation

Headland is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in its own business operations or supply chains.

Headland is also committed to ensuring there is transparency in its approach to tackling Modern Slavery throughout its business and supply chains, consistent with Headland's disclosure obligations under the Act.

The prevention, detection and reporting of Modern Slavery in any part of Headland's business and supply chains is the responsibility of all those working for it or under its control.

Employees who also include contractors, are encouraged to raise concerns with their manager or Director Governance, about any likely Modern Slavery breaches in any parts of Headland's supply chains or business, at the earliest possible stage.

Headland expects the same high standards from all of its contractors, suppliers and other business partners. Headland's contracting processes will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect suppliers to hold their own suppliers to the same high standards.

Policy Program

Headland's Modern Slavery program contains the following elements:

1. Policies

Headland currently operate the following policies that support awareness of acceptable practice and behaviour; and the reporting mechanisms to raise concerns of inappropriate behaviour:

- HR policy and guidelines for employee conduct

2. Procedures

Headland will meet the requirements under the Modern Slavery Act in three ways:

1) *Procurement of goods and services (Procurement Policy and Procedure)*

The procurement framework is the key mechanism whereby suppliers are engaged by Headland. The procurement framework provides for due diligence on these suppliers and their compliance with the Act. Procuring goods and services will, as far as reasonable, be conducted in a way as to ensure that Headland sources goods and services from entities that comply with their obligations under the Act. The extent of the due diligence conducted in the procurement process will depend on the types of goods or services being sourced.

Some examples of the due diligence that may be conducted include requesting:

- self-assessment/attestation that the supplier complies with various provisions in the Act;
- a copy of the supplier's most recent Modern Slavery statement (if applicable);
- details of structure and operations of their supply chain; and/or
- details of the actions taken by the supplier to manage and address modern slavery risks in their supply chain. If a proposed contract is included as part of the procurement, consideration must be given to a provision ensuring compliance with the Act.

2) *Contract management and monitoring key suppliers/offshore partners*

- Obligation to comply with the Act;
 - A requirement to take reasonable steps to ensure that there is no modern slavery in the contractors supply chains or any subcontractor's supply chains; and
 - A requirement to notify Headland if the supplier becomes aware of any actual or suspected breach of the Act.
- The adoption of anti-slavery wording in contracts to cover compliance with the Act.

The obligations in the clause to include:

- Headland will work collaboratively with key suppliers/business partners to identify and manage modern slavery risks and develop commercial and actionable solutions.

3) *Statement Preparation, Endorsement and Approval*

- The Act requires that an annual statement be prepared and approved for each financial year where the Company has a revenue of at least \$100 million.
- Where required, the annual statement will be approved by the Board and signed by a member of the Board. The preparation and submission of the annual compliance statement will be done in association with Headland.

Definitions

Employees:

Individuals employed by Headland Technology Pty Ltd, including continuing or ongoing, fixed term, casual and sessional employees, and contractors.

Richard Kloé

Managing Director

Headland Technology