



MODERN SLAVERY AND HUMAN RIGHTS POLICY

At the **Device Technologies Group** (this policy applies to all Device Technologies Group businesses regardless of entity name or type), we believe in the importance of fundamental human rights and promoting an end to modern slavery.

We are strongly committed to ensuring that the products we provide to our customers are sourced and delivered in a way that respect the global standards of human rights.

In addition to our obligation to comply with the Modern Slavery Act 2018 (Cth) ("**MSA**"), we acknowledge our responsibility towards ensuring that our operations and supply chains comply with accepted local and international standards, which are derived from the Modern Slavery Act 2018 (Cth) and the principles of the United Nations (**UN**) Global Compact.

Our Modern Slavery & Human Rights Policy *applies to our own business and conduct* as well as all suppliers, vendors, business partners, service providers, contract manufacturers and sub-contractors (collectively, **Suppliers**) of the Device Technologies Group.

The Modern Slavery & Human Rights Policy should be read in conjunction with our overarching **Supplier Code of Conduct** and forms an important pillar of trust with our Suppliers.

Our Suppliers are expected to familiarise themselves, acknowledge (through signed declaration of our overarching Supplier Code of Conduct) and comply with the Modern Slavery Policy requirements.

STANDARDS

Both as an employer and as a business acquiring products and services, the Device Technologies Group does not tolerate any form of exploitation through slavery, servitude, any type of forced or compulsory labour or human trafficking.

1. Labour and working hours

- Suppliers to the Device Technologies Group must only employ individuals that meet the minimum age requirements in their country of operation.
- Suppliers must not use forced labour (for example, debt bondage, slavery, or otherwise), traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. All work undertaken to supply product or services to Device Technologies Group must be undertaken by individuals whose labour is not forced or coerced and must be undertaken by workers that are remunerated appropriately for the work that is performed.

MODERN SLAVERY AND HUMAN RIGHTS POLICY

Workers must be free to leave work and terminate their employment or other work status with a reasonable notice period.

- If a Supplier uses migrant labour, they must ensure that documents are not confiscated, communication takes place in a language that workers can understand, workers are accommodated without any physical confinement (unless it is necessary on security grounds or for worker's health and safety) if accommodation is provided, and workers are appropriately trained to undertake the roles they perform.
- Suppliers must ensure that employees do not work more than the maximum hours permitted under the relevant labour laws in the country of operation. Any wages, overtime and other statutory benefits must be paid at the relevant legally directed rate and accurate, transparent record keeping must be available for audit purposes. Suppliers are expected to pay the legal minimum wage and must not make deductions from their worker's wage that would result in wages paid to any workers falling below the legal minimum, delay or withhold payment of wages, replace their wage with other forms of compensation, unless with the prior agreement and free and uncoerced consent of the worker. Suppliers must have no control over their workers' bank accounts. A worker must also not be working excessive hours for the sole purpose of cost savings on labour hire. Where workers work beyond their reasonable hours of work per week, they must be entitled to a minimum of one-day-off break and not exceed the maximum legal working hours.
- Suppliers must respect the rights of employees to form and join trade unions and bargain collectively. If suppliers operate in a country where these rights are impaired by law, they must allow employees to freely elect their own representatives which can enter into dialogue with the supplier about working conditions.

2. Human trafficking

Device Technologies Group does not accept the use of forced labour including but not limited to prison labour, indentured or bonded labour and human trafficking.

Suppliers must not facilitate the travel of any person that would result in that person being exploited or forced to perform labour and must actively ensure that all elements of the Suppliers operations are free from these practices.

3. Non-discrimination and harassment

Suppliers must treat all employees with respect and must not use any form of violence or threatening behavior including but not limited to verbal, physical, sexual or psychological harassment or abuse.

MODERN SLAVERY AND HUMAN RIGHTS POLICY

Suppliers must not discriminate in their hiring and employment practices and employment decisions must be made solely based on the potential employee's skills, qualifications, abilities and work experience. Suppliers must ensure that there are appropriate measures in place to prevent discrimination based on race, religion, colour, gender identity, sexual orientation, political opinions or affiliations within their organisation.

4. Health and safety

All Suppliers must provide their employees with a safe and healthy work environment which meets a minimum requirement as prescribed under the applicable health and safety laws. Additionally, Suppliers must ensure that occupational health and safety risks are managed and all employees are provided with appropriate training and personal protective equipment where required.

Water and Hygienic Facilities: Suppliers must provide access to safe and potable water. Suppliers must maintain hygiene in the workplace, which includes providing a clean bathroom (with soap, toilet paper and hand towels and/or dryers), clean wipes, sanitizers and tissues. Bathroom facilities must be cleaned regularly to prevent the spread of infection.

Food: Where food is provided to workers, the workplace must be equipped with facilities enabling the safe and hygienic storage, preparation, handling, reheating and consumption of food.

Accommodation: Where accommodation is provided to workers, the living conditions must be safe and clean and meet the minimum safety and health standards required under the relevant applicable laws.

5. Grievance Mechanism

Suppliers must ensure their workers have access to grievance mechanisms to raise issues in a confidential manner without fear of retaliation. The mechanism must allow anonymity for the worker's protection and allow escalation of unresolved grievance and access to remedy where a company-level grievance process has failed.

6. Whistleblower Program

The Device Technologies Whistleblower program is also available to encourage reporting of *Reportable Conduct* that is of legitimate concern by providing a convenient and safe reporting mechanism, and protection for people who make disclosures.



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Disclaimer

Device Technologies Group may amend any of its policies at any time at its absolute discretion.

These policies will be updated and available on the Company website – www.device.com.au . Suppliers must ensure they regularly familiarise themselves with any changes to policies from time to time or as notified directly by Device Technologies Group.