

# Modern Slavery Policy

Skellerup Holdings Limited

Created by	Version number	Date	Approved by
SHL	v.1	10 June 2022	SHL Board

## **Policy Purpose**

The Company and its subsidiaries (collectively referred to as “the Group” or “Skellerup”) is committed to reducing instances of modern slavery occurring within its own business, in its supply chains or through any other business relationship and to properly managing potential instances of modern slavery as appropriate.

## **Background**

Modern Slavery is an umbrella term for serious exploitative work practices that represent violations of human rights, including forced labour, bonded labour, child labour, severe exploitation of migrant workers and human trafficking. As a business that operates in multiple jurisdictions around the world, Skellerup supports the protection of human rights including as reflected in the UN Universal Declaration of Human Rights, the UN Convention of the Rights of the Child and the International Labour Organisation (ILO) Core Conventions. Skellerup is guided by the Ten Principles of the UN Global Compact, including that businesses should support and respect the protection of internationally protected human rights.

## **Policy Scope**

This Policy applies to all persons working for or on behalf of the Group, in any capacity, including employees, directors, officers, contractors, consultants and any other third-party representative. Skellerup expects all who have, or seek to have, a business relationship with the Group to familiarise themselves with this Policy and to act in a way that is consistent with its values.

## **Application**

Skellerup will not tolerate any form of modern slavery in its operations or supply chain. Skellerup’s Code of Ethics requires all Company Personnel to comply with this Policy and in particular to report any alleged or suspected occurrence or incidence of Modern Slavery within Skellerup’s operations or supply chain.

Each subsidiary and business unit must:

1. Adopt policies and procedures to ensure that it is reducing the risk of and addressing modern slavery in its operations and supply chains in a way that is appropriate for the relevant subsidiary or business unit. This includes regular review of responsible labour standards, wages and employment conditions and recruitment practices in countries where its subsidiaries and business units operate.
2. Include in its operational and supplier contract terms, as far as practicable, requirements that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate and have specific policies in place to mitigate the risk of modern slavery in their own operations and supply chain.
3. Include in its operational and supplier contract terms, as far as practicable:
  - a. a requirement that suppliers have in place policies to mitigate the risk of modern slavery in their own operations and supply chain;
  - b. an obligation to notify Skellerup of any suspected instance or allegation of modern slavery in the supplier’s operations or supply chains and the supplier’s proposed response; and
  - c. termination rights in favour of the subsidiary or business unit if the supplier is unable or

unwilling to work towards full compliance with these requirements.

### **Reporting and remediation**

Skellerup takes any allegations or suspected instances of modern slavery in its operations and supply chains seriously.

We are committed to addressing potential and actual risks of modern slavery across our organisation and supply chains. Accordingly, Skellerup expects and encourages its employees and its suppliers to report any concerns they may have regarding any actual or suspected occurrence or incident of modern slavery or unethical conduct.

All reports are treated confidentially and are fully investigated.

### **Protected Disclosures**

Skellerup is committed to the principles and practices set out in the *Protected Disclosures Act 2000*. If any employee learns of a breach or suspects a breach of this Policy, they should report that in accordance with Skellerup's Whistleblower Policy.

### **Breaches of Policy and Reporting**

Any concerns regarding potential conduct involving modern slavery should be reported first to the immediate manager, preferably in writing, clearly identifying the nature of the concern. If the employee or contractor is uncomfortable reporting the wrongdoing to their immediate manager, they may report the wrongdoing to the next level up or directly to the Chief Executive Officer, the Chief Financial Officer or the Chairperson of the Board's Audit Committee.

Any breach of this Policy will be taken seriously. Any employee who breaches this Policy will face disciplinary actions, which may result in dismissal for misconduct or gross misconduct.

### **Training**

To ensure a widespread understanding of its obligations and ethical standards, Skellerup will actively track its modern slavery training to ensure, as a priority, employees, contractors and consultants undertaking procurement activities have the requisite modern slavery risk awareness to be undertaking any business with suppliers, thereafter, expanding the group of people undertaking modern slavery training across the business.

### **Review**

This Policy is subject to annual review by the Board. If you have feedback on the Policy, please contact the CFO.

### **References**

This Policy should be read in conjunction with:

Code of Ethics Policy

Whistleblower Policy

Protected Disclosures Act 2000