

## Policy

# Modern Anti-Slavery Policy

## 1. Policy Statement

Modern slavery does not have a set definition. However, it may take a number of different forms including slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking. The common feature amongst each of these is the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Technology One Limited (CAN 010 487 180) and its subsidiaries (TechnologyOne) are committed to acting ethically and with integrity in 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 business or in any of its supply chains.

In accordance with its obligations under the Modern Slavery Act 2018 (Cth) and Modern Slavery Act 2018 NSW) (Modern Slavery Laws), TechnologyOne is also committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains. TechnologyOne expects the same high standards from all of its contractors, suppliers and other business partners.

Therefore, TechnologyOne's contracting processes will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude or debt bondage, whether adults or children, and TechnologyOne expects that its suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for TechnologyOne or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners

## 2. Responsibility for the Policy

TechnologyOne's board of directors (Board) has overall responsibility for ensuring this policy complies with TechnologyOne's legal and ethical obligations, and that all those under their control comply with it. The Board is also responsible for approving TechnologyOne's annual modern slavery statement and ensuring that it complies with TechnologyOne's disclosure obligations under Modern Slavery Laws.

The Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it. The responsibilities extend to:

- monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in TechnologyOne's operations.
- monitoring and consulting with TechnologyOne's suppliers, contractors and business partners to identify risks of modern slavery practices in TechnologyOne's supply chains;
- developing measures to assess and address any risks of modern slavery practices, including through due diligence in TechnologyOne's contractual relations;
- monitoring the effectiveness of those measures;
- developing appropriate training materials and programs for TechnologyOne's employees to comply with this policy; and
- preparing TechnologyOne's annual modern slavery statement in accordance with its disclosure obligations under Modern Slavery Laws.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains, including any areas of TechnologyOne's business and supply chains which are identified as at risk of modern slavery practices.

Comments, suggestions and queries in relation to this policy are encouraged and should be addressed to the Company Secretary

### **3. Compliance with the Policy**

All employees must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of TechnologyOne's business or supply chains is the responsibility of all those working for us or under TechnologyOne's control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their manager or the Company Secretary as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of TechnologyOne's business or supply chains of any supplier tier at the earliest possible stage.

If an employee believes or suspects a breach of this policy has occurred or that it may occur, the employee must notify their manager or the Company Secretary or report it in accordance with TechnologyOne's Whistleblower Policy, as soon as possible.

If an employee is unsure about whether a particular action, the treatment of workers more generally or their working conditions within any tier of TechnologyOne's supply chains constitutes any of the various forms of modern slavery, they should raise it with their manager or the Company Secretary.

TechnologyOne aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. TechnologyOne is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have been treated in this manner, they should inform the Company Secretary immediately. If the matter is not remedied, and they are an employee, they should raise it formally in accordance with TechnologyOne's Whistleblower Policy.

### **4. Communication and awareness of this policy**

TechnologyOne will provide regular training to all its employees on this policy. This will include training on how to identify modern slavery practices and the particular parts of TechnologyOne's business and supply chains which are subject to a greater risk of modern slavery practices. This training will also form part of the induction process for all individuals who work for TechnologyOne, whether as an employee or a contractor.

TechnologyOne's commitment to addressing the issue of modern slavery in its business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of any business relationship and reinforced as appropriate on an ongoing basis.

### **5. Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which may result in dismissal for misconduct or gross misconduct.

TechnologyOne may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy