



The Harrison Group Anti-Modern Slavery and Human Trafficking Policy

POLICY APPROVED: 17th June 2022

POLICY LAST REVIEWED: 17th March 2025

OWNER: Julie Harrison, Director, Clareville Pty Ltd

1. What is the purpose and scope of this Policy?

This Policy applies to Clareville Pty Limited (**Harrison**), and its associated entities from time to time including:

- Harrison Manufacturing CO Pty Limited;
- A S Harrison & CO Pty Limited;
- Harrison Investments Pty Limited;
- Harrison SPARC Pty Limited
- A S Harrison & Co Pty Limited (NZ)
- Harrison Manufacturing Singapore Pte Limited

(together, the **Harrison Group** and each a **Group Member**).

Addressing modern slavery and human trafficking is a human rights issue and the Harrison Group is committed to protecting human rights in everything that we do. This Anti-Modern Slavery and Human Trafficking Policy (**Policy**) sets out our approach to ethical sourcing and the prevention of worker exploitation — including modern slavery and human trafficking — within our own business and within our broader supply chain.

Harrison is a reporting entity under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). Under the Modern Slavery Act, Harrison must report annually on a number of criteria, including the risks of modern slavery in the Harrison Group's supply chains and operations and the actions taken by the Harrison Group to assess and address those risks.

This Policy clearly states the Harrison Group's commitment to working to identify, assess, address and mitigate the risk of modern slavery through our supply chains and in our operations.

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2. What are modern slavery and human trafficking?

Unfortunately, modern slavery and human trafficking are global problems involving grave human rights abuses for victims and can occur in the operations or supply chains of any organisation, regardless of the industry or sector.

Modern slavery covers all types of slavery and servitude, including forced or compulsory labour, debt bondage, indentured servitude, force marriage or the worst forms of child labour. An example of modern slavery is if an organisation engages a third party contractor for cleaning services and the cleaning staff of that contractor live in a dormitory provided by their employer but are only allowed to leave the dormitory to work.

Human trafficking refers to the recruitment, transportation, transfer, harbouring, or receipt of persons for the purposes of exploitation, including modern slavery, by means of the threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability, or the giving of payments or other benefits. An example of human trafficking is if a recruitment agency promises some foreign workers that they will be carrying out IT services in Australia but when they arrive, they have their passports confiscated and are forced to do menial work in a clothing factory with no pay and limited food.

Appendix 1 to this Policy has some potential indicators of modern slavery and human trafficking, which you will find helpful if you are involved in procuring goods or services, recruiting staff or visiting factories, or simply want to learn more about this issue.

3. Who must comply with this Policy?

This Policy applies to all persons working for any Group Member, including directors, officers and employees and contractors of the Harrison Group.

4. What is our approach to modern slavery and human trafficking?

Modern slavery and human trafficking are criminal offences and a violation of fundamental human rights.

As part of our commitment to our corporate values of the Harrison Group, we are committed to improving our response to the risks of modern slavery and human trafficking and ensuring we act ethically.

Our customers, suppliers and other stakeholders are increasingly concerned about the ethical sourcing of goods and services. So it makes good business sense for us to care about how we make our products and provide our services.

If modern slavery or human trafficking occur within the Harrison Group's business or supply chain, the Harrison Group may incur legal liabilities, and there could be significant reputational damage to the business, as well as to any individual

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directors, officers and employees who are directly involved in misconduct or who choose to ignore the known or suspected misconduct of others.

In addition, the Harrison Group has reporting obligations under modern slavery laws in Australia. The aim of the modern slavery laws is to require reporting entities to take steps to identify and mitigate modern slavery risks within their businesses and broader supply chains, and require reporting entities like the Harrison Group to report on these modern slavery risks and what they are doing to address those risks. We are committed to meeting our reporting obligations, and to implementing, enforcing and continuously improving effective systems and controls to address modern slavery and human trafficking risks.

5. What should I do to comply with this Policy?

All of the Harrison Group's directors, officers and employees (and where applicable, contractors and agents) must read, understand and comply with this Policy. It is expected that all directors, officers and employees will use any prescribed policies and processes which have or will be implemented by the Harrison Group for the purpose of identifying, assessing and addressing modern slavery risks. Some of these may be implemented at the Harrison Group wide level, while other prescribed policies and processes may apply to a specific Group Member.

It is important to be aware that modern slavery and human trafficking could occur in any organisation, regardless of the industry or sector. Guidance issued by the Australian Government indicates that certain sectors, products and services and countries may carry higher risks of modern slavery. We need to procure goods and services from suppliers based in Australia or overseas in order to create high value finished products, ingredients, additives and technical solutions. The Harrison modern slavery statement published in accordance with the Modern Slavery Act sets out the risks we have identified for the Harrison Group and what we are doing to assess and address those risks and measure our effectiveness.

If you become aware of any potential indicators of modern slavery and human trafficking as set out in Appendix 1, you must promptly notify your manager in the first instance.

Appendix 1 to this Policy has potential indicators of modern slavery and human trafficking. You might find Appendix 1 helpful if you are involved in procuring goods or services (e.g. finding cleaning services), recruiting staff or visiting factories, or simply want to find out more about the topic. If you are unsure about whether particular facts or circumstances could present modern slavery or human trafficking risks, you should also contact:

- in the case of A.S. Harrison - the Chief Operating Officer for A.S. Harrison;
- in the case of Harrison Manufacturing Company - the General Manager of Supply Chain for Harrison Manufacturing Company; or

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- if neither of the above are available, the CEO of the relevant Group Member.

The Harrison Group will promptly investigate all good faith reports relating to actual or potential breaches of the Policy, and address breaches whenever and wherever they occur. The Harrison Group aims to encourage our directors, officers and employees to raise concerns, and to support anyone who raises genuine concerns in good faith under the Policy, even if they turn out to be mistaken.

The Harrison Group directors, officers and employees are required to participate honestly and fully in any investigation of an actual or potential breach of this Policy.

If we become aware of modern slavery or human trafficking in our business or supply chain, we will prioritise the welfare and safety of workers. Wherever possible, we will work to remedy breaches and mitigate risks.

The Harrison Group is committed to ensuring that nobody suffers retaliation as a result of reporting in good faith their suspicion that modern slavery or human trafficking may be taking place in any part of the business or global supply chain. Carrying out retaliation in any form—threats, harassment, intimidation, violence, reassignment, demotion, or firing—has no place at The Harrison Group.

If you believe that you have been subjected to retaliation for reporting in good faith their suspicions about modern slavery or human trafficking, please speak to the Group Human Resources Leader. Anyone who threatens or engages in any act of retaliation will be disciplined, up to and including employment termination in accordance with the relevant Group Member Employee Code of Conduct

6. Where can I learn more about the Harrison Group's expectations of its suppliers and sub-suppliers?

The Harrison Group expects its suppliers and sub-suppliers to share our commitment to protecting human rights and adhere to standards that are similar to those set out in this Policy. To learn more about what the Harrison Group expects of our suppliers and sub-suppliers, please refer to the Supplier Code of Conduct.

Appendix 1: Potential Indicators of Modern Slavery and Human Trafficking

Set out below is a list of potential indicators of modern slavery and human trafficking. You will find this list helpful if you are involved in procuring goods or services for the Harrison Group, recruiting staff or visiting factories. The list is not intended to cover every possible situation of modern slavery and human trafficking, and if you believe, suspect or know that modern slavery or human trafficking are occurring within the Harrison Group's business or supply chains, you should immediately consult with the individual set out in section 5 of this Policy.

1. **Restricted Freedoms**

Victims may not possess their passports, visas, identity cards or similar documents, because those documents are being held by someone else.

Victims may not have genuine identity documents or legal permission to work.

Victims may not be able to leave or communicate with people outside their work environment, or show signs that their movements or communications outside their work environment are being restricted or monitored.

Victims may be dependent on their employer for accommodation, transportation, food or medical care, or be forced to purchase items from persons connected to their employer.

2. **Working Conditions and Accommodation**

Victims may have no contract of employment or be on short-term contracts.

Victims may not understand their employment contract or applicable legal protections, or have no ability to negotiate their employment terms.

Victims may be unskilled, not trained for their work, or lack appropriate clothing and equipment for their work.

Victims may not know their work or home address, or be unable to give work or home addresses to others.

Victims may live in poor or substandard accommodation, or have no choice where they live or who they live with.

3. **Financial Arrangements**

Victims may receive little or no payment, or have no or limited direct access to their earnings.

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Victims may be disciplined through fines or deductions from earnings, be bonded by debt to their employer, or be responsible for reimbursing recruitment expenses improperly imposed upon them (such as by recruitment agencies).

Victims may be charged by their employer for services that they do not want or need.

4. Behaviour and Appearance

Victims may allow others to speak for them, even when addressed directly, or speak as though they were instructed by someone else.

Victims may be distrustful of authorities, or be afraid of revealing or losing their immigration status.

Victims may appear to be fearful or anxious.

Victims may suffer from injuries that appear to be the result of an assault, or the result of an application of control measures.

5. Geographic Risks

Victims may be working in a country that is recognised to have a high prevalence of human rights violations, including modern slavery, human trafficking, or labour standards violations.

Victims may be working in a country that has inadequate protections for workers, including limited or no capacity or inclination to effectively monitor and enforce compliance with workplace standards.

Victims may be working in a country that forces parts of the population to work for development purposes (for example, to assist on a compulsory basis with construction or agriculture projects).

Victims may be working in a country that has a high prevalence of people who are vulnerable to exploitation, including modern slavery and human trafficking, because they are disadvantaged, impoverished, displaced (such as following a natural disaster or conflict), or subject to severe discrimination.

6. Product and Services Risks

Cost requirements or delivery timeframes may require suppliers to impose excessive working hours, make cost savings on labour hire, or rapidly increase workforce size.

The development of a product or delivery of a service may have been reported as involving labour exploitation by international organisations or non-governmental organisations.

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7. Entity Risks

An entity may previously have been reported as noncompliant with human rights or labour standards, including by reputable media outlets, international organisations or non-governmental organisations.

An entity's procurement and sourcing processes may appear to be poorly managed or inefficient.

An entity may have complex or opaque supply chains, which may include a lack of information or oversight over sub-suppliers that are indirectly involved in the supply of goods or services to the Harrison Group.

Audit results for an entity may appear to be unreliable or conflict with other sources of information about the supplier, such as reports from non-governmental organisations.