



Title: <b>Modern Slavery and Human Rights Policy (“Policy”)</b>			
<b>Issued by:</b> Legal	<b>Responsible Executive:</b> Chief Financial Officer	<b>Effective Date:</b> 16 February 2024	<b>Issue:</b> 5

**A - Supporting Policies**

<b>Policy No.</b>	<b>Policy</b>
CP0200-016	Anti-Bribery and Anti-Corruption
	Codan Core Values
CP1100-005	Codan Risk Management
CP1000-077	Code of Conduct
CP1000-070	Diversity and Inclusion
CP1000-076	Fair Treatment
CP1000-080	Flexible Working Arrangements
CP0000-039	Privacy
CP0200-015	Sanctions
CP0000-042	Whistleblower Protection
CP1000-519	Work Health, Safety and Environment

**B - Policy Statement**

1. Codan Limited recognizes the inherent dignity and equal and inalienable rights of all members of the human family as articulated in International Bill of Human Rights (**IBHR**) comprised of the Universal Declaration of Human Rights (**UDHR**), the International Covenant on Economic Social and Cultural Rights (**ICESCR**) and the International Covenant on Civil and Political Rights (**ICCPR**). Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, as set out in Annexure A to this document, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Codan Limited and each of its subsidiaries (**Codan**) is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and other human rights violations are not taking place anywhere in our own business or in any of our supply chains. As part of this commitment, Codan has joined the UN Global Compact to ensure ongoing compliance with current and changing global human rights and modern slavery standards.



2. Codan is also committed to ensuring there is transparency in our own business and in our approach to tackling human rights violations including modern slavery throughout our supply chains. Codan expects the same high standards from all of its contractors, suppliers and other business partners. As far as is practicable, we include specific prohibitions in our documented supplier arrangements against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude or debt bondage, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. The *Australian Modern Slavery Act 2018* took effect on 1 January 2019, and requires Codan to make annual public reports (Modern Slavery Statements) on the actions taken to address modern slavery risks in its operations and supply chains.
3. Codan recognizes the importance of promoting and protecting the human rights of women within our operations and across our supply chain. We are committed to upholding the principles of gender equality, empowerment, and non-discrimination in all aspects of our business activities.
  - Codan is dedicated to fostering an environment where gender equality is championed and practiced. We are committed to providing equal opportunities for women in recruitment, hiring, promotion, and compensation, ensuring that decisions are made based on merit and without bias.
  - We strive to empower women within our workforce by providing training, mentorship, and professional development opportunities that enable them to advance their careers and reach their full potential. We are committed to creating a supportive and inclusive workplace culture that values and respects the contributions of women at all levels of the organization.
  - We prohibit all forms of discrimination, harassment, and violence against women in the workplace, whether based on gender, sexual orientation, pregnancy, marital status, or any other protected characteristic. We will promptly investigate and address any complaints or reports of such behaviour and take appropriate disciplinary action against perpetrators.
4. We expect our suppliers and business partners to adhere to the same standards of women's rights and gender equality. We will work collaboratively with our suppliers to ensure that they uphold these principles and respect the rights and dignity of women throughout their operations.
5. The purpose of this policy is to ensure that Codan:
  - sources products and services in accordance with local, national and other applicable laws and community expectations; and
  - acts to prevent, mitigate and where appropriate, remedy human rights and modern slavery violations in its operations and supply chains.



6. This policy applies to all persons working for Codan or on our 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.

**C – Responsibility of the Policy**

1. The board of directors of Codan has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The board of directors of Codan is also responsible for approving Codan’s annual modern slavery statement and ensuring compliance disclosure obligations under Australian modern slavery legislation.
2. Codan will appoint a compliance manager (**Compliance Manager**) who will have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it. The Compliance Manager's responsibilities extend to:
  - a. monitoring, consulting and auditing internal controls and procedures to identify risks of human rights violations including modern slavery practices in our operations under Australian modern slavery legislation;
  - b. monitoring and consulting with our suppliers, contractors and business partners to identify risks of human rights violations and modern slavery practices in our supply chains;
  - c. developing measures to assess and address any risks of human rights violations including modern slavery practices, including through due diligence in our contractual relations;
  - d. monitoring the effectiveness of those measures;
  - e. developing appropriate training materials and programs for our employees to comply with this policy; and
  - f. preparing our annual modern slavery statement for execution by Codan in accordance with its disclosure obligations under Australian modern slavery legislation.

For the purposes of this Policy, the Compliance Manager will be the General Council and Joint Company Secretary of Codan.

3. 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, the UDHR and the issue of modern slavery in supply chains, including any areas of our business and supply chains which are identified as at risk of modern slavery practices.



4. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Manager.

**D – Compliance with the Policy**

1. You must ensure that you read, understand and comply with this policy.
2. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
3. You must notify your manager **OR** the Compliance Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
4. You are encouraged to raise concerns about any issue or suspicion of human rights violations including modern slavery in any parts of our business or supply chains at the earliest possible stage.
5. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager **OR** Compliance Manager as soon as possible. Alternatively, in accordance with Codan's Whistleblower Protection Policy, you may report any breach or suspicion of a breach of this policy that has occurred, or that may occur.
6. If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within our supply chains constitutes any of the various forms of human rights violations including modern slavery, raise it with your manager **OR** the Compliance Manager.
7. Codan 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. Codan is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that human rights violations including modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally with the CEO of the Company.

**E – Risk Management**

1. Codan acknowledges that it is accountable for addressing human rights violations including modern slavery issues in operations and supplier arrangements, and will nominate a specified individual or role to be responsible for co-ordinating management of this risk.

2. Codan will assess the risks of human rights violations including modern slavery across their operations, including identifying the general sectors and industries, types of products and services, countries and entities that are involved in operations and supply chains taking into account sector and industry risks, product and services risks, geographic risks and specific entity risks.
3. Codan will perform due diligence on new suppliers to determine their risk level and control procedures in relation to human rights, ethical sourcing and modern slavery as appropriate for its business. Codan will have a process in place to consider the supplier's ethical sourcing and modern slavery performance during the supplier on-boarding.
4. Codan will assess suppliers through their audit/compliance program to confirm compliance with this policy.
5. Codan has an accessible and well-publicised reporting mechanism for concerns or disclosure in relation to compliance risks (including modern slavery) which allows for confidential and anonymous reporting and provides protection from reprisal. This mechanism is specified within Codan's Whistleblower Protection Policy. There must be clear processes for investigating and reporting on the issues raised through the reporting mechanism.
6. Codan will be committed to working with suppliers to remediate any breaches of this policy.
7. Codan will monitor and annually review the effectiveness of the risk management measures described above.

#### **F – Communication and awareness of this Policy**

1. Codan will provide regular training to all our employees on this policy. This will include training on how to identify human rights violations including modern slavery practices and the particular parts of our business and supply chains which are subject to a greater risk of human rights violations including modern slavery practices. This training will also form part of the induction process for all individuals who work for Codan in areas of the business that could encounter modern slavery risks.
2. Codan's commitment to addressing the issue of modern slavery in our business and supply chains will be communicated to the suppliers, contractors and business partners it deems appropriate when considering the modern slavery risks within such suppliers, contractors and business partners.

#### **G – Breaches of this Policy**

1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
2. Subject to the terms of any applicable contractual arrangement, we may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



**Annexure A – Types of Modern Slavery**

<b>Type of exploitation</b>	<b>Definition</b>
<b>Trafficking in persons</b>	Recruitment, harbouring and movement of a person for exploitation through modern slavery.
<b>Slavery</b>	Where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
<b>Servitude</b>	Where the victim’s personal freedom is significantly restricted and they are not free to stop working or leave their place of work.
<b>Forced labour</b>	Where the victim is either not free to stop working or not free to leave their place of work.
<b>Forced marriage</b>	Coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
<b>Debt bondage</b>	Victim’s services are pledged as security for a debt and the debt is manifestly excessive or the victim’s services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
<b>Child labour</b>	Where children are: • exploited through slavery or similar practices, including for sexual exploitation or • engaged in hazardous work which may harm their health, safety or morals or • used to produce or traffic drugs. *The worst forms of child labour can occur in a variety of contexts and industries. This may include orphanage trafficking and slavery in residential care institutions, as well as child labour in factories and manufacturing sites, mining and agriculture.
<b>Deceptive recruiting for labour or services</b>	Where the victim is deceived about whether they will be exploited through a type of modern slavery.

**Annexure B – Universal Declaration of Human Rights**

**Preamble**

Whereas recognition of the inherent dignity and of the equal and inalienable rights of all members of the human family is the foundation of freedom, justice and peace in the world,

Whereas disregard and contempt for human rights have resulted in barbarous acts which have outraged the conscience of mankind, and the advent of a world in which human beings shall enjoy freedom of speech and belief and freedom from fear and want has been proclaimed as the highest aspiration of the common people,

Whereas it is essential, if man is not to be compelled to have recourse, as a last resort, to rebellion against tyranny and oppression, that human rights should be protected by the rule of law,

Whereas it is essential to promote the development of friendly relations between nations,

Whereas the peoples of the United Nations have in the Charter reaffirmed their faith in fundamental human rights, in the dignity and worth of the human person and in the equal rights of men and women and have determined to promote social progress and better standards of life in larger freedom,

Whereas Member States have pledged themselves to achieve, in co-operation with the United Nations, the promotion of universal respect for and observance of human rights and fundamental freedoms,

Whereas a common understanding of these rights and freedoms is of the greatest importance for the full realization of this pledge,

Now, therefore,

The General Assembly,

Proclaims this Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance, both among the peoples of Member States themselves and among the peoples of territories under their jurisdiction.

**Article 1**

All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.

**Article 2**

Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.

**Article 3**

Everyone has the right to life, liberty and security of person.



**Article 4**

No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.

**Article 5**

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

**Article 6**

Everyone has the right to recognition everywhere as a person before the law.

**Article 7**

All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.

**Article 8**

Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.

**Article 9**

No one shall be subjected to arbitrary arrest, detention or exile.

**Article 10**

Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him.

**Article 11**

1. Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defence.
2. No one shall be held guilty of any penal offence on account of any act or omission which did not constitute a penal offence, under national or international law, at the time when it was committed. Nor shall a heavier penalty be imposed than the one that was applicable at the time the penal offence was committed.

**Article 12**

No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks.

**Article 13**

1. Everyone has the right to freedom of movement and residence within the borders of each state.
2. Everyone has the right to leave any country, including his own, and to return to his country.

**Article 14**

1. Everyone has the right to seek and to enjoy in other countries asylum from persecution.
2. This right may not be invoked in the case of prosecutions genuinely arising from non-political crimes or from acts contrary to the purposes and principles of the United Nations.

**Article 15**

1. Everyone has the right to a nationality.
2. No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality.

**Article 16**

1. Men and women of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution.
2. Marriage shall be entered into only with the free and full consent of the intending spouses.
3. The family is the natural and fundamental group unit of society and is entitled to protection by society and the State.

**Article 17**

1. Everyone has the right to own property alone as well as in association with others.
2. No one shall be arbitrarily deprived of his property.

**Article 18**

Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.

**Article 19**

Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.

**Article 20**

1. Everyone has the right to freedom of peaceful assembly and association.
2. No one may be compelled to belong to an association.

**Article 21**

1. Everyone has the right to take part in the government of his country, directly or through freely chosen representatives.
2. Everyone has the right of equal access to public service in his country.
3. The will of the people shall be the basis of the authority of government; this will shall be expressed in periodic and genuine elections which shall be by universal and equal suffrage and shall be held by secret vote or by equivalent free voting procedures.

**Article 22**

Everyone, as a member of society, has the right to social security and is entitled to realization, through national effort and international co-operation and in accordance with the organization and resources of each State, of the economic, social and cultural rights indispensable for his dignity and the free development of his personality.

**Article 23**

1. Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.
2. Everyone, without any discrimination, has the right to equal pay for equal work.
3. Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.
4. Everyone has the right to form and to join trade unions for the protection of his interests.

**Article 24**

Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.

**Article 25**

1. Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.
2. Motherhood and childhood are entitled to special care and assistance. All children, whether born in or out of wedlock, shall enjoy the same social protection.

**Article 26**

1. Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory. Technical and professional education shall be made generally available and higher education shall be equally accessible to all on the basis of merit.
2. Education shall be directed to the full development of the human personality and to the strengthening of respect for human rights and fundamental freedoms. It shall promote understanding, tolerance and friendship among all nations, racial or religious groups, and shall further the activities of the United Nations for the maintenance of peace.
3. Parents have a prior right to choose the kind of education that shall be given to their children.

**Article 27**

1. Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits.
2. Everyone has the right to the protection of the moral and material interests resulting from any scientific, literary or artistic production of which he is the author.

**Article 28**

Everyone is entitled to a social and international order in which the rights and freedoms set forth in this Declaration can be fully realized.



**Article 29**

1. Everyone has duties to the community in which alone the free and full development of his personality is possible.
2. In the exercise of his rights and freedoms, everyone shall be subject only to such limitations as are determined by law solely for the purpose of securing due recognition and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society.
3. These rights and freedoms may in no case be exercised contrary to the purposes and principles of the United Nations.

**Article 30**

Nothing in this Declaration may be interpreted as implying for any State, group or person any right to engage in any activity or to perform any act aimed at the destruction of any of the rights and freedoms set forth herein.