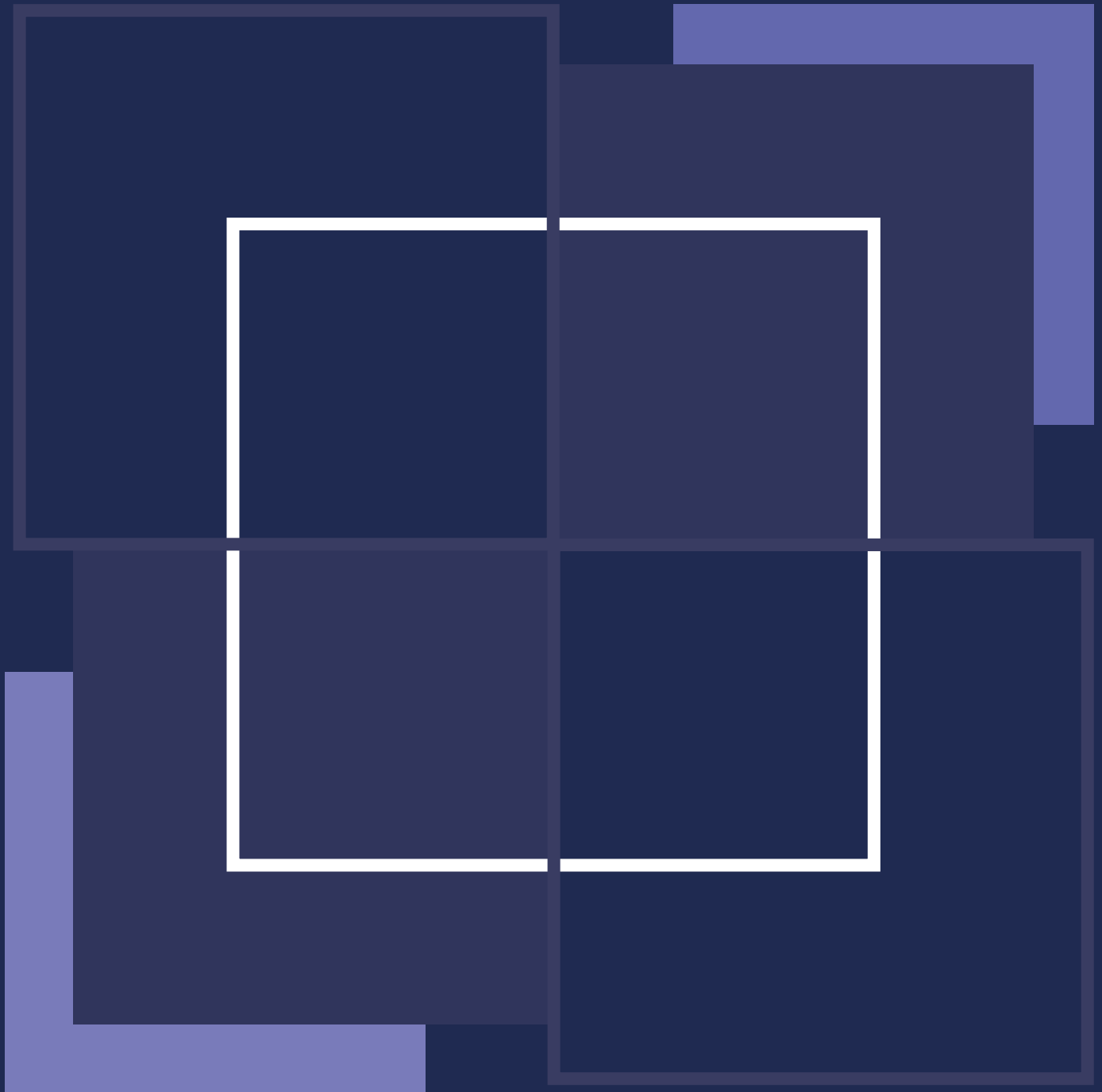


# MODERN SLAVERY STATEMENT



Codan Limited and its Controlled Entities (Codan)



# 1. The Reporting Entities

This is a Joint Modern Slavery Statement for Financial Year 2024 (FY24) for Codan Limited (ACN 007 590 605) (Codan) and its wholly owned subsidiary Minelab Electronics Pty Ltd (ACN 008 208 446) (Minelab) and the entities they control. Codan is headquartered in Adelaide, South Australia.

# 2. Codan Structure, Operations and Supply Chains

Codan is listed on the Australian Securities Exchange (ASX:CDA). Founded in 1959, Codan continues to expand into the global markets and has established a global footprint of approximately 940 employees with sales offices in Australia, Brazil, Canada, Denmark, India, Ireland, Mexico, Singapore, the UAE, the UK and the USA.

Codan is a technology company that provides robust technology solutions that solve customers' communications, safety, security and productivity problems in some of the harshest environments around the world. Our customers include United Nations organisations, security and military groups, government departments, major corporates as well as individual consumers and small-scale artisanal miners.

Codan's products are sold in more than 150 countries, with exports accounting for more than 85% of its sales. Codan has a global network of dealers, distributors and agents that allow it to deliver its solutions and capabilities anywhere in the world.

Codan has the following brands in its Communications and Metal Detection portfolios:

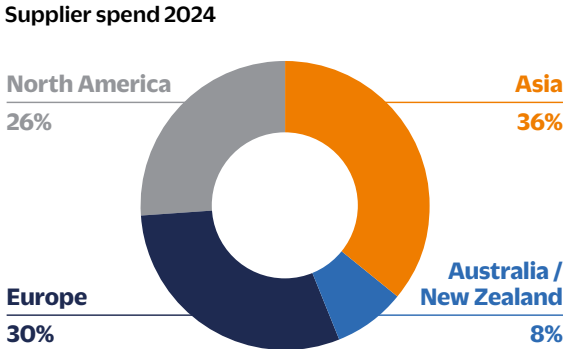
- Communications - Domo Tactical Communications (DTC) and Zetron Inc. (Zetron).
- Minelab Metal Detection – Recreational, Gold Mining and Countermine metal detecting.

Codan's primary manufacturing facility, located at its head office in South Australia, continues to be an integral part of its operations where it serves as a technology hub for new product development and the manufacture of 'IP-sensitive' and high-complexity products. Of particular note are the Communications divisions security-featured radios and Minelab's countermine detectors, which retain an element of local manufacture. Zetron and DTC are both headquartered in the USA. Zetron has manufacturing facilities in Redmond, USA as well as Victoria, BC, Canada. DTC has manufacturing facilities in the UK, Denmark and the USA.

Codan's Australian operations are responsible for purchasing materials for all of Minelab's products and a significant proportion of the Communications division's products. Codan has an extensive global supply chain in place, sourcing products and materials from 1,076 direct suppliers from 33 different countries. At the end of Codan's supply chain are global distribution centres located in the UAE, the USA, Netherlands, New Zealand, Malaysia, Poland, Brazil, India, Uruguay, Mexico and Australia, which ensures product is regionally distributed for the fastest route to market. Zetron's distribution centres are located in the USA, the UK and Australia. DTC has distribution facilities in the UK, Denmark, Singapore, and the USA.

Codan's strategic relationships with world leading subcontract electronics manufacturers remains a cornerstone of its manufacturing approach. Most of Codan's manufacturing is carried out in Malaysia, via two main suppliers, namely Plexus Services Corp (Plexus) and Venture International Pte Ltd (Venture). Codan has extensive multi-year partnerships with these entities under which it has developed significant relationships with each.

The Codan Group's total material supplier spend in FY24 was approximately AUD \$180million with the distribution of that spend as follows.



### 3. Governance Framework

The following image details the Codan Governance Framework, as it relates to modern slavery. Other than some policies and processes added during FY24, this remains unchanged from FY23. For further details regarding our Governance Processes, please see our [FY24 Corporate Governance Statement](#).



## 4. Risks of Modern Slavery in Codan's Operations and Supply Chains

It is acknowledged that any of the categories of modern slavery including:

- Trafficking in persons;
- Slavery;
- Servitude;
- Forced labour;
- Forced marriage;
- Debt bondage;
- Deceptive recruiting for labour or services; or
- The worst forms of child labour;

could potentially be occurring within Codan's global supply chain. In FY24, Codan was made aware of an adverse finding of modern slavery practice within its supply chain. Details of this are outlined in section 9.3 below.

As in FY23, Codan has again engaged an independent consultant (Nathan Winter & Associates) to assist with the ongoing assessment of the potential risk of modern slavery within Codan's operations and supply chain.

This assessment has been based on the sector, industry, services, products procured and geographical locations of Codan's suppliers utilising the following published sources of known modern slavery risk:

- The 'Modern Slavery Risk, Rights & Responsibilities – A Guide for Companies and Investors' commissioned by the Australian Council of Superannuation Investors (**ACSI Publication**);
- The US Department of Labor's 'List of Goods Produced by Child Labor or Forced Labor;' and
- The US Department of State's '2023 Trafficking in Persons Report'.

Codan's assessment has also considered the independent review of modern slavery legislation in Australia led by John McMillan and his subsequent report, namely the 'Report of the statutory review of the *Modern Slavery Act 2018* (Cth) – The first three years' (the **McMillan Report**). Codan has reviewed these recommendations in the McMillan Report and assessed that it is well positioned to comply with the majority of the recommendations should they be enacted.

### 4.1 Statutory Reform Recommendations

Codan will continue to monitor reform in legislation and regulations and use its best endeavours in adhering to best industry practices and standards to ensure that it is able to identify, mitigate and remediate modern slavery practices that may arise within its supply chain.

### 4.2 Sector, Industry and Service Analysis

As in FY23, an analysis of the ACSI Publication has identified the following **sectors/industries and services** as potential areas of risk for the Codan 'Corporate' group:

- Branded and unbranded goods (including garments) not for re-sale utilised in our laboratories, for marketing or cleaning;
- Transport and accommodation utilised by our employees when they travel for work;
- The manufacturer of the Information Technology equipment we use including computers and printers; and
- Raw material extraction and the smelting of minerals that are utilised in the production of such Information Technology equipment.

The following **sectors/industries and services** were identified as potential areas of supply chain risk for our 'Operations':

- Security, maintenance and cleaning;
- Asset and tenant management;
- Transportation: ports, maritime freight and truck drivers;
- Storage of hazardous materials; and
- Base skill processing labour.

### 4.3 Product Analysis

Codan analysed its procurement of material supplies against the US Department of Labor's 'List of Goods Produced by Child Labor or Forced Labor'.

The following are goods procured from countries of concern:

Country	Goods Produced by Child or Forced Labour
Brazil	Garments, Bricks, Footwear, Timber
China	Aluminium, Garments, Gloves, Polysilicon, Electronics, Textiles, Lithium-Ion Batteries, Bricks, Footwear
Malaysia	Electronics, Garments, Rubber Gloves
Mexico	Garments
India	Bricks, Carpet, Footwear, Garments, Glass, Locks, Matches, Mica, Sandstone, Stone

Codan also have the following goods incorporated in the buildings we use in our operations:

- Bricks;
- Nails;
- Carpets;
- Locks;
- Timber;
- Glass;
- Stone (including limestone); and
- Rubber.



## 4.4 Geographical Analysis

The Codan group's direct material suppliers have been analysed based on where they are located against the US Department of State '[2023 Trafficking in Persons report](#).' This report classifies all countries as either:

- Tier 1;
- Tier 2;
- Tier 2 Watch List; or
- Tier 3.

These are defined as follows:

Tier	Definition
1	Countries whose governments fully meet the US Trafficking Victims Protection Act (TVPA) minimum standards for the elimination of trafficking.
2	Countries whose governments do not fully meet the TVPA's minimum standards but are making significant efforts to bring themselves into compliance with those standards.
2 Watch List	Countries whose governments do not fully meet the TVPA's minimum standards but are making significant efforts to bring themselves into compliance with those standards, and for which: <ul style="list-style-type: none"> <li>• the estimated number of victims of severe forms of trafficking is very significant or is significantly increasing and the country is not taking proportional concrete actions; or</li> <li>• there is a failure to provide evidence of increasing efforts to combat severe forms of trafficking in persons from the previous year, including increased investigations, prosecution, and convictions of trafficking crimes, increased assistance to victims, and decreasing evidence of complicity in severe forms of trafficking by government officials.</li> </ul>
3	Countries whose governments do not fully meet the TVPA's minimum standards and are not making significant efforts to do so.

Source: US Department of State '2023 Trafficking in Persons Report'

The analysis identified the following for Codan's group suppliers:

Tier	Number of Direct Suppliers	Countries in which Suppliers are Based
1	980	Australia, Austria, Canada, Czech Republic, Denmark, Finland, France, Germany, Luxembourg, Netherlands, Singapore, Spain, Taiwan, United Kingdom and United States of America.
2	55	Hong Kong S.A.R., India, Indonesia, Ireland, Israel, Italy, New Zealand, Norway, Oman, Republic of Korea, Slovakia, Switzerland, Turkey and United Arab Emirates.
2 Watch List	18	Malaysia and South Africa
3	22	People's Republic of China

One direct supplier is based in Mauritius; however this country is not accounted for in the US Department of State '2023 Trafficking in Persons Report'.

The Codan Tool for supplier risk analysis known as the 'Supplier Sourcing Process' spreadsheet continues to include specific fields to list the US Department of State 'Human Trafficking' Country Tier that the Supplier is located in and whether they supply a good and are from a country that is on the US Department of Labor List of Goods produced by Child Labor or Forced Labor. This provides Codan with transparency as to the volume and nature of its modern slavery risk in its supply chain.

## 5. Actions Taken by Codan to Assess and Address Modern Slavery Risks

### 5.1 Policies

In previous years we reported on our key policies that have been established. These continue to be important and relevant. They are as follows:

- A Code of Conduct that governs a framework around conduct required of our employees. It also provides guidance with respect to expected and acceptable standards of behaviour that are aligned with Codan's core values (which includes acting lawfully and therefore acting in accordance with the Modern Slavery Act.) This Code of Conduct is issued to all employees upon induction;
- A Supplier Code of Conduct that sets the expectations for suppliers and explicitly includes not using any forms of modern slavery;
- A Modern Slavery and Human Rights Policy, which sets out our commitment to combatting modern slavery in our business and supply chains and ensures that our business practices are aligned with the Universal Declaration of Human Rights (**UDHR**). This expectation of compliance with these policies extends to contractors, suppliers and business partners;
- A Whistleblower Protection Policy, which provides protection for employees, suppliers and other third parties by encouraging a 'speak up' culture. This Policy outlines the mechanisms available for reporting and the investigation of misconduct, such as modern slavery, and the communication process that will be followed. It also advises of the protections available to eligible whistleblowers. Reports can be made anonymously. In FY24, we received no reports of misconduct relating to modern slavery or human rights related issues;
- A Risk Management Policy that sets the framework for managing risks within Codan; and
- An Anti-Bribery and Anti-Corruption (**ABAC**) Policy, which, among other things, requires Codan employees to conduct due diligence on proposed third parties and ongoing due diligence on current third parties to assess their suitability to partner with Codan from an ABAC perspective.

Each of the above are well established and we continually assess their relevance in dealing with modern slavery risks in our business and supply chains. In addition, we acknowledge the importance of building upon what we have in place and, during FY24, we have added the following policies and guidelines to bolster our framework:

- A Conflict Minerals Policy outlining Codan's commitment to ethical sourcing standards and practices throughout our supply chain. Codan recognises the potential negative impacts associated with the extraction and trade of conflict minerals and have developed a policy that outlines our stance and approach to mitigating the risk of sourcing conflict minerals; and
- Modern Slavery Remediation Guidelines which outlines how Codan will address and actively participate in the identifying, investigating, assessing and resolution of modern slavery injustices. These guidelines have been modelled upon the 'Modern Slavery Response & Remedy Framework' published by Walk Free and Human Rights Resource and Energy Collaborative.

### 5.2 Dedicated Team

Codan's General Counsel and Joint Company Secretary is the dedicated Compliance Manager for the Codan Group. In addition, Codan's Legal & Compliance team works closely with the Supply Chain Manager's team to form Codan's Modern Slavery Working Group (**MS Group**). The MS Group meets periodically throughout the year (at least six (6) times) to review and update actionable items.

It is the responsibility of the MS Group to ensure Codan's modern slavery program is well resourced and the Modern Slavery Policy is well communicated and implemented.

In addition, Codan's General Counsel reports directly to the Audit and Risk Committee on all modern slavery related matters.

### 5.3 Training

Codan continues to implement a compulsory online modern slavery training requirement as part of the new employee induction process. All employees are required to renew their modern slavery training on a bi-annual basis.

Codan facilitated modern slavery awareness training to relevant Venture and Plexus personnel during in person visits to both organisations during FY24. The training was very broad and thorough and importantly addressed pertinent issues relevant to both Plexus and Venture (such as the appropriate due diligence to be carried out when dealing with external recruitment agencies in its recruitment of staff). Additionally, both organisations provide modern slavery awareness training as part of their onboarding process for new employees.

Codan will endeavour to provide in person awareness training while visiting other direct suppliers and encourage them to conduct equivalent modern slavery training with their personnel.

### 5.4 Supplier Due Diligence Process

Codan continues to carry out supplier due diligence and a risk assessment before entering any commercial relationship with a new supplier. This is followed by a formal renewal process every three (3) years. Codan has a documented flow chart, which outlines the process for the internal procurement team to make the appropriate risk assessment for supplier approval. The process includes requesting a copy of the supplier's modern slavery policy, or equivalent thereof. This process was enhanced in FY24 to align with best industry practices, which facilitates engagement with suppliers and encourages them to be transparent and share accurate information to identify areas needing improvement and allowing for collaborative problem solving.

No suppliers have been rejected from our Supplier Due Diligence process in FY24. Codan is committed to working with all suppliers to assist them in better understanding modern slavery risks and where possible, assisting in advising on remediation of their modern slavery processes.

Codan's Supplier Terms and Conditions include:

- modern slavery clauses;
- the requirement to comply with our Supplier Code of Conduct; and
- the requirement for suppliers to allow inspections, audits and ongoing monitoring.

### 5.5 Monitoring of Critical Suppliers with Third-Party Screening

Codan includes critical suppliers into Refinitiv's World-Check Risk Intelligence third-party screening system which undertakes daily searches for negative media reports or sanctions via more than 1500 databases worldwide (including local language media) using the supplier name as well as key words including 'fraud' and 'modern slavery'. In FY24, no hits were identified in the ongoing monitoring.

Codan considers its **'High Risk'** suppliers to be those that suppliers that are either in countries that are:

- in Tier 3 or Tier 2 Watch List within the US Department of State '2023 Trafficking in Person's report'; or
- listed as those of concern with respect to US Department of Labor's list of goods produced by child labour or forced labor.

Most critical suppliers, 40 of which operate in countries that fall within the US Department of State 'Human Trafficking' Tier 3 and Tier 2 Watch List countries from DTC were also added into this third-party screening system with no adverse findings.

Codan will continue to update and conduct searches of the Refinitiv World-Check Risk Intelligence database for all new High Risk third parties and by the end of FY25, it will ensure that it includes **all** its direct suppliers within Refinitiv's World-Check Risk Intelligence third-party screening system.



## 6. Need to Remediate

During FY24, other than the item outlined at section 9.3 below (which Codan continues to work through with the relevant supplier), we did not identify any other occurrences of modern slavery in our operations or supply chain. In the event we were to encounter any other modern slavery practices in our operations or supply chain caused or contributed to by us, we will take action to cease, investigate and remediate such contribution to the modern slavery practices and those affected. We will also take steps internally and work with third parties and suppliers to implement processes to mitigate and prevent future incidents.

As previously mentioned, we have developed our Modern Slavery Remediation Guidelines which outline the actions we will take in the event we identify modern slavery occurrences in our operations. The guidelines apply to Codan group employees, contractors, suppliers and other individuals who are engaged for their services globally. This plan has been activated with respect to the instance we outline below at section 9.3.

Where we encounter modern slavery practices in our supply chain, we will use our leverage to influence the entity responsible for the modern slavery to take action that aligns with our guidelines and consider whether we should provide for, and, or cooperate in remedying any actual impact. If we are unable to exert the appropriate influence to have the entity to cease the modern slavery practices, we will consider terminating the business relationship. To the extent possible, we will use best efforts to inform any victims that are identified within our supply chain of the remediation channels available to them and we will ensure that remediation is conducted confidentially to protect any victim's privacy. We also follow up once the remediation is completed to ensure that it has been effective, and the modern slavery has not re-occurred.

## 7. FY24 Action Plan and Outcomes

In our FY23 Modern Slavery Statement, we committed to a number of actions, some of which have required continued and ongoing efforts for target completion. Below, we provide a summary of the outcomes of those actions and where they were not fully completed, why this is the case and when we intend to complete them.

Targets for Actions	Completed?	Comments
80% completion of external modern slavery training rolled out to Codan group employees during FY24.	Yes	82% of Codan group employees completed training in FY24.
Continue to ensure our online modern slavery training is rolled out to all new employees as part of the onboarding process.	Yes	In FY24, Codan onboarded approximately 230 new employees who were provided with modern slavery training materials as part of their induction process.
Translate Supplier Code of Conduct to Mandarin Chinese and distribute appropriately.	Yes	Translated Supplier Code of Conduct is distributed to relevant suppliers as part of onboarding.
Ensure the Supplier Due Diligence process conducts searches of the Refinitiv World-Check Risk Intelligence database for <b>all</b> High Risk suppliers on an ongoing basis.	Ongoing	Codan has updated this task for FY25 and <b>all</b> product and material suppliers (as outlined in section 2 above) will be subject to due diligence screening through the Refinitiv World-Check Risk Intelligence database.

<b>Targets for Actions</b>	<b>Completed?</b>	<b>Comments</b>
Conduct formal modern slavery audits of Venture and Plexus and a selection of suppliers that are located in High Risk countries that were not audited in FY24 (as defined in item 5.5).	Yes	In person audits of two of our biggest suppliers in Penang, Malaysia, with no adverse findings.  Codan also continued to distribute modern slavery questionnaires to suppliers that required renewal and new suppliers that were deemed High Risk that will be reviewed by the Supply Chain Manager.
Undertake necessary follow ups with those suppliers with whom we have identified as requiring assistance from FY23 audits and those 4 suppliers that did not respond.	Yes	All outstanding audit questionnaires from FY23 have been returned completed appropriately.
Commit that any visits by the Supply Chain Manager to any suppliers will have an agenda item dedicated to modern slavery compliance and questions.	Ongoing	The Supply Chain Manager did not visit any suppliers, other than Plexus and Venture in FY24.
Establish remediation guidelines to be followed in the event we discover modern slavery within our operations.	Yes	Remediation guidelines established.
Promote online modern slavery training that is freely available to our suppliers and encourage them to utilise it.	Ongoing	In searching for free online training for our supplier base, we found no relevant training and alternatively will consider creating our own short document to outline key considerations when it comes to modern slavery risk.  Training to key personnel at Plexus and Venture was provided on modern slavery.
Conduct an audit of the Supplier Sourcing Process throughout the controlled entities for new Suppliers since the new process was introduced.	Ongoing	We have undertaken this for all Codan entities but not for DTC or Zetron.
Establish Key Performance Indicators (KPIs) for modern slavery training, supplier audits that include modern slavery, and remediation of any instances of modern slavery.	Ongoing	Codan will continue to assess and recalibrate its recurring KPI's and establish new KPI's where appropriate annually.

Targets for Actions	Completed?	Comments
Use our 'influence' with External Providers that have greater abilities to identify and report modern slavery red flags, in particular our labour hire providers and the Financial Institutions of which we are a customer.	Ongoing	Through our audit process and regular interactions with critical suppliers we constantly raised modern slavery risks and seek comments and feedback from our suppliers on concerns they have.  We have open dialogue with suppliers to identify their labour hire practices and if they align with proper modern slavery practices.

## 8. Action Plan for FY25

During FY25, Codan is committed to:

- working through those commitments that remain unfinished from FY24;
- implementing an online supplier management tool to allow for full scope supplier onboarding and approval process, automated supplier lifecycle and performance updates (including supplier ratings) and records of communication with suppliers;
- expanding our MS Working Group to include stakeholders from different business units and regions throughout Codan's global operations;
- creating our own short information document on key issues and themes to consider with respect to modern slavery which can be distributed to suppliers;
- conduct additional in-person audits of 'High Risk' suppliers (as well as continued audits of our key contract manufacturers); and
- including all product and material suppliers in the Refinitiv World-Check Risk Intelligence database for ongoing screening.



## 9. Assessing the Effectiveness of our Actions

Our actions during FY24 were focussed on further developing and consolidating our own Modern Slavery Policy and processes with an emphasis on sharing the foundations we have developed with suppliers in our supply chain. We were able to continue with our regular in person audits with our two key Malaysian suppliers.

Further, we continued to conduct online audits of new High Risk suppliers. Increased efforts in FY25 to conduct more auditing may well identify instances of modern slavery within our supply chain. We will continue to monitor for any instances of modern slavery with our aim to remediate any instance identified as quickly as possible.

### 9.1 Key Performance Indicators (KPIs)

Codan will have a KPI that 100% of employees will be provided with access to its modern slavery training module within the first 4 weeks of employment with an expectation that it be completed within 4 weeks of receiving such training.

Codan will also expand its scope of due diligence by submitting 100% of its suppliers to continuous screening through the Refinitiv World-Check Risk Intelligence database to allow for greater transparency within its supply chain.

Codan will continue to develop existing and establish new KPIs where applicable to refine employee knowledge, create ongoing visibility with suppliers and to improve internal mechanisms to identify and remediate modern slavery in our supply chain.

### 9.2 Review of Key Suppliers - Case Study

In undertaking its risk assessment with respect to modern slavery, Codan's primary risk remains unchanged and consistent with prior years – that is, it lies with its major third-party contract manufacturers (Venture and Plexus). Both are based in Penang, Malaysia and manufacture up to 32% of Codan products. Codan's supply and procurement team are in regular contact with Plexus and Venture and have undertaken numerous discussions around their approaches to modern slavery.

In March 2024, members of the MS Group conducted in person audits at the sites of its key manufacturers in Penang, Malaysia. It has prepared and retained detailed reports of these audits. The audits allowed for follow up on each of the Supplier's actionable items from FY23 and to discuss the key and emerging areas of risk within their supply chains. The MS Group were impressed with the engagement and attitude of both Plexus and Venture personnel with respect to modern slavery risk. They demonstrated a proactive approach to combatting modern slavery and have an appreciation of why this is critical for Codan.

In FY24, each of Plexus and Venture noted a focus on the risks associated with labour hire agencies for suppliers. These risks included deceptive recruiting techniques and debt bondage. Both Plexus and Venture employ a high proportion of foreign workers, a percentage of whom facilitate the process of manufacturing Codan products. Both suppliers advised Codan that, when possible, they use the Responsible Business Alliance (**RBA**) certified labour hire agencies. Furthermore, each of Venture and Plexus check that prospective employees are not paying fees to such labour hire agencies. Codan encouraged both manufacturers to be very vigilant with agencies not certified by the RBA promoting regular screening and audits.

We will continue to work with both organisations to ensure that they comply with the standards we expect. We will also extend this requirement to relevant DTC and Zetron contract manufacturers.

### 9.3 Adverse Finding in Direct Supply Chain

During its standard supplier screening process, a supplier disclosed to Codan that they were not fully compliant with Codan's Modern Slavery Policy. As a result of this disclosure, Codan's Supply Chain Manager implemented our newly created remediation guidelines to work towards understanding the non-compliance and working with the supplier to remedy the issue.

The issue related to a supplier disclosing that it was withholding its employees passports. The supplier noted that this was at the request of its employees based on 'security reasons'. At the time of writing this statement, we have not completed our process with this supplier and as a result, the outcome is to be determined.

We will provide details of the resolution of this matter in our FY25 statement. Notwithstanding, Codan is committed to assisting the supplier in remediating the matter and providing education and assistance to appropriately manage and rectify the situation. This illustrates Codan's commitment to transparency in its reporting and its desire for continuous improvement in its processes to increase its capability to detect these forms of modern slavery in its global supply chain.

### 9.4 Collaborating with Third Parties

Codan remains a member of the United Nations Global Compact (**UNGC**) and, in FY24, we once again declared our commitment to the Ten Principles of the UN Global Compact on human rights, labour, environment and anti-corruption. This commitment remains unchanged.

Codan, through its MS Group, is very active in identifying networking, development and educational opportunities to facilitate continued learning and development of what is best practice with respect to modern slavery compliance.

## 10. Consultation with Entities that Codan Limited Own or Control

Each Codan subsidiary is bound by Codan's policies, procedures and systems, including those in relation to contracting, purchasing and human resources. This statement reflects those policies and procedures and expresses a collective purpose of each entity within the Codan group to identify, mitigate, prevent and remediate modern slavery risks within its supply chain.

As in FY23, the Codan General Counsel and Joint Company Secretary represents the MS Group and presents this statement and summary of all completed actions and initiatives as well as presenting forward looking actions for the next financial year to the Codan board for its review, consideration and approval.

This statement was tabled and approved by the board of Codan Limited at its meeting on the 18 December 2024.



**Alf Ianniello**

Managing Director and CEO  
Codan Limited

