



## Modern Slavery Policy

**HDL has a zero-tolerance approach to modern slavery, and we are 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 is not taking place anywhere in our own business or in any of our supply chains.**

### Our position on modern slavery

Horsell Duffy Langley (HDL) rejects any form of modern slavery such as slavery, servitude, human trafficking and forced labour. We are committed to implementing controls to ensure it does not occur in our business and raising awareness about it in our own business and supply chain. We respect the human rights of our employees, customers and those of our suppliers and business partners. We aim to identify and manage risks related to human rights across our business and through our supply chain management.

Slavery is a criminal offence in Australia and includes slavery, slave trading, sexual servitude, forced labour, forced marriage, debt bondage, human trafficking and child labour.

### What will HDL do about modern slavery?

#### Governance

HDL is committed to high standards of corporate governance so that our decisions and actions are based on transparency, integrity, responsibility and performance which promote the long-term sustainability and ongoing success of our business. We strive to maintain a compliant and ethical culture in our business practices. We have included our rejection of modern slavery in relevant policies such as our code of conduct, diversity, anti-bribery and corruption and whistleblowing policies.

Our code of conduct sets out the standards of behaviour we expect of our business and people. We expressly set out our commitment to human rights and that we reject any form of modern slavery.

Our whistleblowing arrangements provide an avenue for our people to raise concerns about modern slavery.

#### Workplace

HDL is committed to complying with relevant laws, community expectations and ethical standards related to human rights and modern slavery in respect of our employees and business. We treat people with respect and dignity and do not tolerate discrimination or harassment. We strive to be an equal opportunity employer. We are committed to ensuring our employment conditions at least meet minimum legal standards and we have a program designed to improve and support the health and wellbeing of our people. We are committed to creating and maintaining a diverse workforce and an inclusive and safe environment for all.

Employees are encouraged to report any genuine concerns about modern slavery relating to our people, business or supply chain.

We will provide training to ensure our people have a good understanding of and respect for human rights. We intend that the training will assist our people to identify and evaluate risks relating to modern slavery and what to do if these issues arise.

#### Supply chain

Our supply chain includes underwriting agencies, insurers, IT service providers, other service providers and consultancy and professional services firms, located primarily in Australia.

HDL acknowledges the potential for modern slavery to occur in our supply chains. Our suppliers are expected to manage their business in an ethical manner respecting human right. Suppliers are expected to ensure that all employees and contractors are legally entitled to work and no bonded, forced or involuntary labour, child labour, human trafficking or other forms of slavery in employed in the delivery of their products and services to HDL.

HDL plans to undertake due diligence on its supply chain and seek to identify risks of modern slavery in its supply chain. We will report on our progress in the modern slavery statement referred to below.

### How to report concerns about modern slavery

Employees are encouraged to report any genuine concerns about modern slavery relating to our people, business or supply chain. Our whistleblowing policy provides details about how to do this. HDL treats all reports seriously.

### Modern slavery statement

HDL will publish a modern slavery statement in 2020 which will describe the steps that HDL will have taken during the financial year ending 30 June 2020 to address modern slavery and human trafficking risks at HDL and in our supply chains and will also set at our plans for future improvements.

### How the policy is to be made available

A copy of this policy will be available on HDL's intranet and be made available to our people and suppliers.

The Board will usually review this policy annually. The Board may, in its discretion, either adjust or exclude a specific requirement of this policy from time to time, either generally or on a case-by-case basis. This policy may be amended, ceased or replaced, by a resolution of the Board.

### Contact us for further information

**Head Office:** Level 3, 205 Clarence Street  
Sydney NSW 2000  
**Phone:** 1300 565 622  
**Email:** info@HDLBrokers.com.au

