HUMAN RIGHTS POLICY

We believe every person has the right to work freely, safely and with dignity. We all have a part to play in respecting and protecting that right.

Guided by our values, Programmed is committed to treating people fairly, with dignity and respect. We seek to prevent and address adverse human rights impacts that we may cause or contribute to, and to prevent or mitigate impacts directly linked to our operations or services through our business relationships.

Our core commitments are to:

- **Respect internationally recognised human rights** including the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights.
- **Comply with applicable laws** in Australia, New Zealand and other jurisdictions in which we operate. Where legal requirements and internationally recognised standards differ, we seek to apply the higher standard to the extent lawful.
- **Provide equality of opportunity** and do not tolerate unlawful discrimination, bullying, harassment, victimisation or other conduct that undermines dignity, inclusion or respect.
- **Protect fundamental labour rights** including freedom of association and collective bargaining, lawful and fair remuneration, reasonable working hours, rest and leave, safe and healthy work, and freedom from forced labour, child labour, trafficking and other forms of modern slavery.
- **Respect privacy and responsible technology use** by protecting personal information and taking reasonable steps to prevent unfair discrimination or other adverse human rights impacts arising from data, automated decision-making or algorithms.
- **Recognise heightened vulnerability** and consider the rights and circumstances of migrant and temporary workers, young workers, women, people with disability, LGBTQ+ people, Aboriginal and Torres Strait Islander peoples, Māori and Pacific peoples, and other groups who may face greater risk of harm or exclusion.

Scope

This Policy applies to all activities undertaken by Programmed and to all directors, officers, employees, labour hire workers and other people acting on our behalf. We expect suppliers, contractors, subcontractors, labour providers, agents and other business partners to respect the principles of this Policy.

Responsibilities

Our directors, officers, employees, labour hire workers and other people acting on our behalf must:

- act consistently with this Policy and complete any human rights and modern slavery training assigned to their role;
- identify and promptly report suspected human rights or modern slavery concerns;
- cooperate with risk assessments, due diligence, investigations and remediation; and
- never retaliate against a person for raising a concern in good faith.

Business partners are expected to meet the human rights requirements communicated to them and comply with applicable contractual obligations.

Demonstrating our Commitment

- **Human rights due diligence:** We identify and assess actual and potential impacts, prioritise the most severe and likely risks, integrate findings into decisions and controls, track effectiveness and communicate outcomes where appropriate.
- **Modern slavery prevention:** We prohibit slavery, servitude, forced or compulsory labour, debt bondage, deceptive recruiting, human trafficking, forced marriage, the worst forms of child labour and other slavery-like practices. No worker should pay recruitment fees to obtain work with Programmed, be required to surrender identity documents, or be subjected to coercion, threats, restriction of movement or unlawful wage deductions.
- **Responsible employment:** We verify identity, age and work rights as required; provide clear employment terms; pay lawful wages and entitlements; manage working hours and leave; protect freedom of association; and maintain safe, healthy and respectful workplaces.
- **Responsible business relationships:** We communicate expectations to suppliers, contractors, labour providers, customers and other partners, undertake risk-based screening and assessment, include appropriate contractual requirements, monitor higher-risk relationships and respond to identified concerns.
- **Grievance and, Speak Up and remedy:** Employees, workers, candidates, suppliers and other stakeholders may raise concerns through their manager, HR, Risk & Compliance, Legal, HSE or Programmed's confidential Speak Up channels. Speak Up can be contacted at speakup@programmed.com.au or, in Australia, 1300 035 808 or, in New Zealand, 0800 950 450. Further reporting options and protections are set out in Programmed's Whistleblower Policy. Reports are handled promptly, fairly and confidentially as appropriate. Retaliation against anyone who raises a concern in good faith is prohibited.
- **Remedy:** Where Programmed has caused or contributed to harm, we provide for or cooperate in appropriate remediation. Where harm is directly linked to our operations or services through a business relationship, we seek to use our influence to prevent or mitigate it.
- **Training, consultation and communication:** We provide guidance and role-appropriate training to help our people recognise, prevent and report human rights and modern slavery risks, with additional support for roles exposed to higher-risk activities and business relationships. We consult relevant stakeholders and communicate our commitments and progress, including through modern slavery statements and other required disclosures.
- **Monitoring and continual improvement:** We use risk assessments, supplier information, audits, incident and grievance data, corrective actions and performance measures to test effectiveness and improve our approach.

Legal and International Framework

We comply with applicable laws and are guided by internationally recognised human rights and labour standards. We monitor relevant developments and update our approach as required.



Graeme Hurn

Programmed Chief Executive Officer

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