

Link Group Human Rights Policy

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1. What is this policy?

Link Group is committed to respecting **human rights**. The Human Rights Policy (Policy) supports the Code of Conduct and Ethics that sets the standards for the way we work at Link Group.

The Policy outlines how human rights are protected and incorporated into Link Group policies and processes and how Link Group meets all related regulatory requirements in the jurisdictions in which we operate.

Words in **bold** have the meaning stated in Section 8. Definitions and appear in bold when first used.

2. Why do we need this policy?

Link Group respects and promotes human rights and effective management of issues relating to **modern slavery** and human rights risks.

Link Group takes the risk of modern slavery seriously. Across our supply chain and within our operations, we aim to operate as a responsible and ethical business with respect for human rights. We are committed to implementing and monitoring ongoing practices which support human rights and address modern slavery risks in our business across all jurisdictions we operate in.

Link Group supports fundamental human rights as set out in the Universal Declaration of Human Rights and core International Labour Organisation conventions. In line with the UN Guiding Principles on Business and Human Rights, Link Group recognises the responsibility of businesses to respect human rights.

Link Group strives to:

- conduct our business in a manner that respects the rights and dignity of all people, complying with our legal obligations
- respect that all employees have a right to reasonable work conditions and remuneration
- not use forced, compulsory or child labour or other forms of modern slavery in our operations
- not tolerate harassment, adverse discrimination, bribery or corruption in our operations
- require that relevant **Employees** maintain and enhance our commitment to human rights protection and receive appropriate human rights compliance training and guidance; and
- improve transparency within our business supply chains and operations, including disclosure of potential risk of modern slavery. The concept of 'risk' when referring to modern slavery refers to the risk to people, rather than risk to Link Group.

3. Who does the policy apply to?

The Policy applies to all Employees of Link Group.

We encourage our suppliers to conduct business in an ethical manner and to share our commitments in supporting human rights, and in eliminating modern slavery in their organisation and supply chain.

4. How to comply with this policy?

4.1 Link Group's responsibilities

Link Group is committed to conducting its business in accordance with all applicable laws and regulations and in a way that enhances our reputation in the market. Where local legislation conflicts with the principles and processes described in this Policy, Link Group will comply with the law, while also seeking ways to uphold human rights principles within its operating environment.

Link Group will strive to:

- take steps to identify, prevent or address human rights impacts
- undertake due diligence required to identify and manage human rights risks when assessing new client relationships and suppliers
- not conform with any requests to contribute to, or turn a blind eye to, any breaches of this Policy or of applicable laws related to human rights
- integrate relevant provisions regarding human rights into our supplier management, standard supplier contracts of existing suppliers and employee compliance training; and
- report periodically on our approach to human rights, and regularly review and update our approach. This includes monitoring current and emerging regulations related to human rights, such as those concerning modern slavery, and adapting our policies and practices accordingly.

4.2 Employee responsibilities

Link Group expects every Employee to:

- comply with all relevant laws, including those related to human rights and workplace safety
- comply with this Policy, our Code of Conduct and Ethics and all Link Group policies covering aspects of human rights and ethical behaviour
- report all suspected breaches of this Policy in accordance with the Speak Up framework or seek guidance from your manager or an **ELT** member, or the CSR & Sustainability Manager if unsure whether an activity breaches this Policy; and
- undertake relevant training on human rights where their role requires specific knowledge.

4.3 Regulatory obligations by jurisdiction

Link Group has regulatory obligations under the UK and Australian modern slavery legislation to publish an annual statement on the risks of modern slavery in our operations and supply chains, and actions to address those risks. A summary of key regulation requirements is provided in annexure 1.

5. How will policy compliance be monitored?

5.1 Reporting/Monitoring

Link Group Human Resources and Brand division is responsible for maintaining records of the number and severity of breach reports and for monitoring this Policy's effectiveness. They will report periodically to the ELT. A periodic report will be provided to the Board on the Policy's effectiveness, major breaches if any, and remedial actions undertaken.

Further detail regarding our approach to human rights and the number of Human Resources grievances, which may include aspects of human rights, can be found in our annual Sustainability Report and through our annual reporting of modern slavery statements.

5.2 Non-compliance

Failure to take reasonable steps to comply with this Policy may result in disciplinary action, up to and including termination of employment.

6. Are there any interrelated policies?

Link Group has a range of interrelated policies which cover our obligations as an employer, underpinned by our core values:

- Anti-Bribery and Anti-Corruption Policy
- Code of Conduct and Ethics
- Complaints and Dispute Handling Policy
- Discrimination and Equal Employment Opportunity (EEO) Policy
- Diversity and Inclusion Policy
- Fraud Prevention Policy
- Grievance Policy
- Harassment Policy
- Remuneration Policy
- Risk Management Policy and Framework
- Sustainability Policy
- Vendor Management Policy
- Global Whistleblower Policy

7. Definitions

Term	Definition
Link Group	Link Administration Holdings Limited and each of its subsidiaries
Employees	Any permanent employee, temporary worker and contractor, full time and part time of the Link Group.
ELT	Executive Leadership Team comprising the Managing Director and direct reports to the Managing Director
Human rights	Link Group adopts the United Nations definition: <i>“Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.”</i>
Modern Slavery	For the purpose of this Policy, the term has the same meaning as defined in the Australia Modern Slavery Act (2018) and the UK Modern Slavery Act (2015).

The Australian Act modern slavery means conduct which would constitute:

- An offence under Division 270 (slavery and slavery-like conditions) or 271 (trafficking in persons and debt bondage) of the [Criminal Code](#)
- An offence under either of those Divisions if the conduct took place in Australia
- Trafficking in persons, as defined in [Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons](#)
- The worst forms of child labour, as defined in [Article 3 of the ILO Convention \(No. 182\)](#) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour

The UK Act references “slavery”, “servitude” and “forced or compulsory labour” to have the same meaning as [Article 4 of Convention for the Protection of Human Rights and Fundamental Freedoms](#).