

Modern Slavery Policy

Happsa Group have zero tolerance to slavery, servitude and/or compulsory labour, human trafficking and any relevant exploitation (together, "Modern Slavery"). We are committed to ensuring that our business dealings are carried out in compliance with all relevant laws and regulations regarding the Modern Slavery Act 2018 effective from 1 January 2019.

The Modern Slavery Policy will be enforced within the organization to both our own workforce as well as to our supplier networks. We will take the following steps to combat modern slavery and human trafficking risks:

- Implement policies, procedures and code of conducts to set up standards and to provide guidelines.
- Undertake due diligence and risk assessment to avoid involvement with suppliers where there could be potential risks of slavery.
- Provide ongoing training to procurement and all relevant staff to assess risks of human right abuses in any form.
- Where required, support partners to conduct regular and ongoing audits and monitoring measures to identify and remedy any existing and/or potential risks.

The prevention, detection and reporting of any human right abuses in any part of the business or supply chain is the responsibility of all those working for the business or related to the business. All relevant stakeholders are required to avoid any activity that might lead to a breach of the policy. Any breaches of the policy may result in disciplinary action, which could result in dismissal or termination of contract for misconduct.



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Date 01/07/2025

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