



Cuscal

Human Rights Policy



1. Introduction

Cuscal Limited is committed to maintaining the highest possible ethical standards and complying with all applicable laws. In all its operations, Cuscal Limited seeks to respect and promote the human rights of its employees, business partners and the broader community.

This commitment is aligned to our vision, *Enabling the Future* and to our values:

- ❑ **We earn Trust:** Trust and transparency form the foundation of everything we do.
- ❑ **We are One Team:** One Cuscal, one team, one plan. What we achieve we achieve together.
- ❑ **We think Customer:** Our partnership and service set us apart.
- ❑ **We Adapt and Adopt:** We are innovative on the growth edge. We lead the way into the Future.

2. Purpose

The purpose of this Human Rights Policy (**Policy**) is to:

- ❑ document Cuscal Limited and its Australian-based subsidiaries' (**Cuscal**) commitments and approach to respecting and promoting human rights and modern slavery issues; and
- ❑ set out the responsibilities and measures by which Cuscal will seek to prevent abuses of human rights from occurring in our business operations, including our supply chain.

3. Scope

This Policy applies to all Cuscal directors, officers, employees, secondees, contractors, consultants and vendors. Cuscal expects its vendors, clients and other third parties with which it deals to comply with the principles set out in this Policy.

4. Our Commitment

Cuscal is committed to respecting and promoting internationally recognised human rights, including those contained in the:

- ❑ United Nations Universal Declaration of Human Rights;
- ❑ International Covenant on Economic, Social and Cultural Rights;
- ❑ International Covenant on Civil and Political Rights;
- ❑ International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work; and
- ❑ United Nations Declaration on the Rights of Indigenous Peoples.

Cuscal is also committed to operating our business in a way that is consistent with the United Nations' Guiding Principles on Business and Human Rights (**UNGPs**) and is working towards incorporating the UNGPs as a foundation in our approach to human rights.





The table below sets out the human rights issues that are relevant to Cuscal's business and our approach to addressing these issues.

| Human Rights Issue | Our Approach |
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| Modern Slavery | <p>Modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.</p> <p>In line with the <i>Modern Slavery Act 2018</i> (Cth), Cuscal seeks to prevent in its own operations and restrict dealings with vendors, clients and other third parties involved in:</p> <ul style="list-style-type: none">❑ human trafficking;❑ slavery;❑ servitude;❑ forced marriage;❑ forced labour;❑ debt bondage;❑ child labour; and❑ deceptive recruiting for labour or services. <p>Cuscal takes the following steps to identify and manage modern slavery risks in our operations and supply chain:</p> <ul style="list-style-type: none">❑ undertaking risk assessments to ensure that an appropriate level of risk management and due diligence is undertaken for potential new vendors;❑ undertaking periodic assessments of existing vendors and escalating any identified issues; and❑ imposing contractual warranties on vendors and suppliers that they are not aware that they have engaged in any conduct that would be an offence under the <i>Modern Slavery Act 2018</i> (Cth). <p>Cuscal also expects our vendors to have policies and/or procedures in place to identify, mitigate and address any form of modern slavery within their own operations and supply chain.</p> <p>Escalation and Remediation</p> <p>In line with Cuscal's Whistleblower Protection Policy, all parties to which this Policy applies are encouraged to report any modern slavery concerns either internally through their People Leader, or externally through Cuscal's Ethical Disclosure Alert, an independent externally hosted disclosure facility.</p> |





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| | <p>If a modern slavery concern is raised or Cuscal becomes aware of a modern slavery risk, Cuscal will take appropriate steps to address these concerns and risks. These steps may include:</p> <ul style="list-style-type: none">□ taking steps to improve any substandard vendor practices, including providing advice to vendors through Cuscal’s Vendor Manager and requiring them to implement agreed action plans;□ taking necessary action against vendors that fail to improve their performance in line with an action plan or seriously violate our vendors principles, including the termination of the business relationship; or□ taking disciplinary action against employees who breach Cuscal’s modern slavery initiatives. <p>Assessment</p> <p>Cuscal assesses the effectiveness of its actions to mitigate modern slavery risks including by:</p> <ul style="list-style-type: none">□ reviewing and addressing actual or potential incidents of modern slavery;□ regularly and actively engaging with Cuscal’s employees and suppliers; and□ effectively resolving any grievance or whistleblower complaints. <p>Roles and responsibilities</p> <p>The responsibility for Cuscal’s modern slavery initiatives are as follows:</p> <ul style="list-style-type: none">□ <i>Policies</i>: Operational Risk and Compliance teams together with People & Culture.□ <i>Risk assessments</i>: Operational Risk and Compliance teams.□ <i>Investigations and due diligence</i>: Operational Risk and Compliance teams.□ <i>Training</i>: Operational Risk and Compliance teams together with People & Culture. |
| Labour Rights | <p>Cuscal is committed to upholding the labour rights of our employees, and does so by:</p> <ul style="list-style-type: none">□ requiring employees to treat colleagues, customers and other stakeholders with courtesy, respect, fairness, equity and honesty;□ promoting an inclusive and diverse workplace, where every individual can realise their potential regardless of gender, cultural identity or age;□ prohibiting harassment, discrimination and bullying in the workplace;□ assessing pay equity on an annual basis; |





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| | <ul style="list-style-type: none"> ❑ complying with all requirements of applicable workplace health and safety legislation, regulations and relevant codes and standards to uphold the health, safety and wellbeing of Cuscal’s employees; and ❑ recognising employee’s rights to form and/or join trade unions and to bargain collectively. <p>Cuscal also expects our vendors to do the same.</p> <p>Cuscal does not:</p> <ul style="list-style-type: none"> • withhold worker identity or immigration documents; • use employment recruiters who do not comply with Australian labour laws; • employ workers without appropriate employment contracts; or • restrict employees’ rights to terminate their employment contract. |
| Indigenous Rights and Reconciliation | <p>Cuscal acknowledges the First Nations peoples of Australia and recognises their ongoing role as traditional owners of the land on which Cuscal operates its business.</p> <p>Cuscal is currently developing a Reconciliation Action Plan to guide our reconciliation efforts.</p> |
| Privacy | <p>As a digital service provider, we understand the importance of protecting the right to privacy of our employees, clients, vendors and other stakeholders.</p> <p>Cuscal is committed to safeguarding personal information it may collect or hold at any time in respect of any individual and is committed to doing so in accordance with the requirements of the <i>Privacy Act 1988</i> (Cth) and the Australian Privacy Principles.</p> |

5. Human Rights Due Diligence

Cuscal is committed to undertaking an ongoing process of human rights due diligence to identify, prevent, mitigate and account for our human rights impacts in our business operations and supply chain.

To do this, Cuscal is in the process of enhancing our Vendor Due Diligence processes, which, among other things, will include the development of tools that will automate certain aspects of the collection, analysis and monitoring of vendor human rights and modern slavery risks.

6. Grievance mechanisms

Cuscal is committed to providing avenues to raise human rights grievances and taking appropriate steps to address any concerns raised. We encourage our employees and external parties to ‘call out’ any observed misconduct or mismanagement and to communicate with us promptly, without fear or reprisal.

Our Whistleblower Protection Policy sets out the procedures and avenues available to parties to which this Policy applies for reporting any unethical behaviour, which includes a web-based reporting system maintained by an independent third party.





Where we identify that Cuscal has been linked to an adverse human rights impact, we are committed to providing for, or cooperating in, the remediation of this human rights impact.

7. Governance and Oversight

Cuscal's Board has ultimate responsibility for Cuscal's approach to human rights. The Board has approved this Policy and will review this Policy in accordance with section 8.

The Board has delegated responsibility and oversight of this Policy to the:

- ❑ Board Risk Committee;
- ❑ Executive Leadership Team; and
- ❑ Enterprise Risk and Compliance Committee.

Cuscal is also committed to a culture of continuous improvement, and we are committed to:

- ❑ requiring that all directors, officers and employees of Cuscal receive appropriate training to raise their awareness and capability in relation to human rights issues; and
- ❑ regularly tracking, monitoring, and evaluating the implementation of this Policy and actions. This will involve collaborating with affected stakeholders.

8. Review and Changes to this Policy

- ❑ This Policy will be reviewed at the frequency noted on the cover page to check it is operating effectively and consider whether changes are required.
- ❑ The Board may change this Policy from time to time by resolution.

9. Related Policies and Procedures

This Policy should be read in conjunction with the following:

- ❑ Code of Conduct;
- ❑ Vendor Code of Conduct;
- ❑ Procurement, Outsourcing and Vendor Governance Policy;
- ❑ Anti-Bribery and Corruption Policy;
- ❑ Diversity, Equity and Inclusion Policy;
- ❑ Work Health and Safety Policy;
- ❑ Privacy Policy;
- ❑ Whistleblower Protection Policy; and
- ❑ Sustainability Policy.





10. Document Control

| Version | Date | Policy Owner | Policy Approver | Changes |
|---------|-----------------|--|-----------------|------------|
| 1.0 | 18 October 2023 | Chief Risk Officer / General Counsel and Company Secretary | Board | New Policy |

