

Lánluas Company Policy

MODERN SLAVERY

AUGUST 2025

At Lánluas, we believe every individual has the right to freedom, dignity, and safe work. Modern slavery and human trafficking are severe human rights violations that we reject in all forms. In Australia, the Modern Slavery Act 2018 (Cth) sets clear expectations for large organisations to assess and address these risks. In the United Kingdom, the Modern Slavery Act 2015 requires similar transparency from businesses above a statutory threshold. In New Zealand and Ireland, while no equivalent standalone legislation currently exists, governments have signalled support for stronger protections through domestic reforms and EU-led initiatives. Although our revenue is below the mandatory reporting thresholds in all jurisdictions, Lánluas has chosen to adopt this policy to demonstrate leadership, transparency, and our commitment to ethical business practices throughout Australia, New Zealand, and the United Kingdom & Ireland.

MODERN SLAVERY POLICY

Introduction

Lánluas is committed to conducting business responsibly and ethically. We recognise modern slavery, human trafficking, forced labour, and exploitative practices as serious human rights violations that have no place in our operations or supply chains.

Although our annual revenue is below the Australian Modern Slavery Act 2018 reporting threshold (AUD \$100 million), Lánluas is committed to transparency and to taking practical steps to identify, prevent, and address risks of modern slavery in all jurisdictions where we operate, including **Australia, New Zealand, and the United Kingdom & Ireland.**

OUR BUSINESS

Lánluas is an IT professional services consultancy specialising in enterprise software services. We employ professional staff and operate in Australia, New Zealand, and the UK & Ireland. Our supply chains are limited and largely consist of:

- > Professional services providers (accounting, legal, finance and banking, IT).
- > Software and technology vendors.
- > Office facilities, equipment, and consumables.

Given this profile, Lánluas assesses its inherent risk of modern slavery as **low**. However, Lánluas acknowledges risks may exist in extended supply chains (e.g. subcontracted services).

OUR COMMITMENT

Lánluas is committed to:

- > **Zero tolerance** of modern slavery and human trafficking.
- > Conducting due diligence on key suppliers and contractors.

- > Ensuring our recruitment, employment, and contractor practices are fair, transparent, and compliant with local employment laws.
- > Educating staff and suppliers on recognising risks of modern slavery.
- > Acting promptly if any modern slavery risks or incidents are identified.

GOVERNANCE AND RESPONSIBILITY

Responsibility for this policy rests with the Chief Executive Officer and Resource and Operations function.

All employees, contractors, and suppliers are expected to comply with this policy and report any concerns regarding modern slavery. Concerns may be raised through: line management for staff (employees and contractors); and info@lanluas.com.au for all others.

SUPPLIER AND PARTNER EXPECTATIONS

Lánluas expects its suppliers and business partners to:

- > Operate in full compliance with labour laws in their jurisdiction.
- > Avoid practices that exploit workers, including forced labour, bonded labour, or human trafficking.
- > Cascade these expectations through their own supply chains.

Suppliers who fail to meet these expectations may have their contracts reviewed or terminated, at the absolute discretion of Lánluas.

CONTINUOUS IMPROVEMENT

Lánluas is committed to strengthening its approach by:

- > Periodically reviewing its risk assessments.
- > Updating staff training on ethical sourcing and human rights.
- > Enhancing its supplier onboarding process with appropriate due diligence questions.
- > Monitoring developments in legislation in Australia, New Zealand, the UK & Ireland to ensure compliance and alignment with best practice.

REPORTING CONCERNS

Anyone (staff, supplier, or member of the public) may report concerns of modern slavery relating to Lánluas or its supply chain by contacting:

- > line management for staff (employees and contractors).
- > info@lanluas.com.au for all others.

All reports will be investigated, and appropriate action will be taken.

REVIEW

This policy will be reviewed annually and updated as necessary to reflect legal, regulatory, and operational changes.

APPROVAL

This policy has been approved by the Chief Executive of Lánluas