



Dana Australia Pty Ltd and Dana SAC Australia Pty Ltd – Modern Slavery Statement for the 2024 Financial Year

Contents

1	About this Statement	2
2	Structure, Operations, and Supply Chains.....	3
2.1	Structure	3
2.2	Operations	3
2.3	Supply Chain.....	4
3	Approach to identifying modern slavery risk	4
3.1	Operations	4
3.2	Supply Chains.....	5
4	Approach to addressing modern slavery risk.....	6
4.1	Policy commitment.....	6
4.2	Risk assessment.....	6
4.3	Training.....	7
4.4	Grievance and Remedy	7
5	Assessing effectiveness	7
6	Future Steps	8
6.1	Confirm Modern Slavery Commitment	8
6.2	Collaborate with Dana Inc.....	8
6.3	Establish Modern Slavery Working Group	8
6.4	Conduct Supplier Risk Assessment.....	9
7	Board approval	9

1 About this Statement

Dana Australia (Holdings) Pty Ltd, comprising Dana Australia Pty Ltd (Dana Australia) and Dana SAC Australia Pty Ltd (Dana SAC) (together, “Dana”) has developed this Modern Slavery Statement (Statement) for the purpose of reporting under the *Modern Slavery Act 2018* (Cth) (Modern Slavery Act or Act). This Statement applies to our financial year beginning on 1 January 2024 and ending 31 December 2024, which is aligned with the financial year of our parent company, Dana Incorporated (Dana Inc), which is headquartered in the USA. However, as Dana is based in Australia, in order to meet other Australian reporting obligations, procurement data is reported on a financial year ending 30 June 2024.

2022 was the first year in which we met the consolidated revenue threshold for reporting under the Modern Slavery Act. However, this is our first statement under the Act, submitted by Dana Australia (Holdings) Pty Ltd and covering all operating entities Dana Inc controls in Australia, namely Dana Australia and Dana SAC.

During this reporting period, we engaged external modern slavery and human rights specialists to assist us with:

- Identifying inherent modern slavery risk areas in our supply chains and operations;
- Assessing our current systems and controls for managing modern slavery risk; and
- Developing our approach to managing modern slavery risk in line with Dana Inc’s approach, current and proposed Australian regulatory requirements, and our own values and purpose.

We recognise that we are in the early stages of developing a modern slavery risk management approach tailored to our Australian operations. We will begin by implementing priority actions to begin to address our modern slavery risks and seek to continuously improve as we mature our approach going into the future. We are confident that, as we develop our risk assessment and management approach and engage increasingly with our trusted suppliers on this issue, the risk of modern slavery in our operations and supply chains will be significantly lowered.

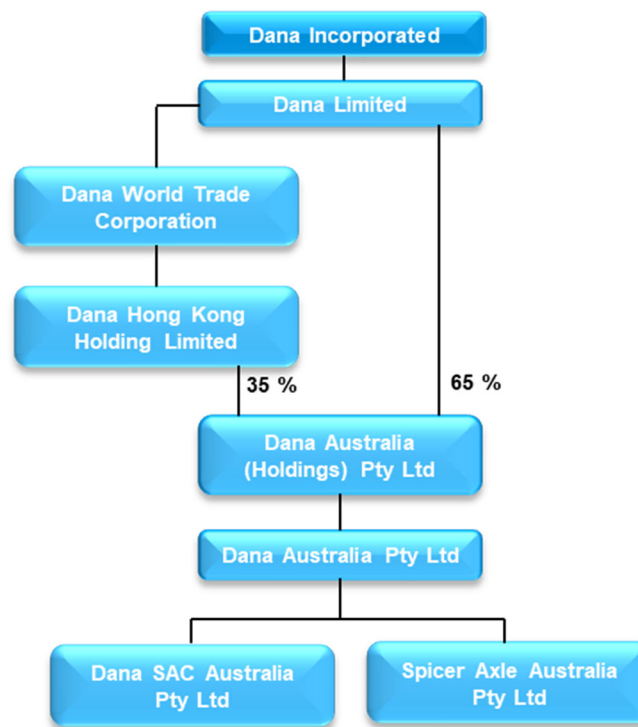
This Statement covers the seven mandatory criteria for reporting under the Modern Slavery Act. The table below indicates where within this Statement each criterion is addressed.

Mandatory criteria for modern slavery statements	Section
Identify the reporting entity	1
Describe the reporting entity’s structure, operations and supply chains	2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	3
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	4&6
Describe how the reporting entity assesses the effectiveness of these actions	5
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	N/A
Any other relevant information	N/A

2 Structure, Operations, and Supply Chains

2.1 Structure

Dana Australia Pty Ltd and Dana SAC Australia Pty Ltd are part of Dana Inc, a US-based leading supplier of fully integrated drivetrain and electrified propulsion systems for commercial passenger vehicles, with operations worldwide. Dana Inc is headquartered in Ohio and is listed on the NYSE American Stock Exchange. Our company structure and position within Dana Inc is as follows:



**NOTE: Spicer Axle Australia Pty Ltd is a dormant entity.*

2.2 Operations

We represent Dana Inc in their Australian operations. At Dana Australia, we supply fully integrated drivetrain and electrified propulsions systems for commercial passenger vehicles from our Keysborough, Melbourne facility. From this facility and from warehouses across Australia, Dana SAC provides sales, assembly, engineering, and services for mechanical, fluid power and winch solutions.

Our local operations are as follows:

Dana Australia	Dana SAC
• 74 full-time employees	• 49 full-time employees
• 6 full-time contractors	• 9 full-time contractors
• 3 part-time contractors	•
	• 6 apprentices and trainees

2.3 Supply Chain

In the 2024 financial year, the goods and services we procured include mechanical parts and components, oils and chemicals, personal protective equipment (PPE) and supplies for our offices and warehouses, with these categories discussed in more detail in Section 3. In terms of a breakdown of our local vs overseas purchasing:

Dana Australia: For the twelve months ending 30 June 2024, 32.5% of supplier spend was on suppliers based locally in Australia with the rest being from overseas suppliers, primarily from Dana Inc affiliates.

Dana SAC: For the twelve months ending 30 June 2024, 35.6% of our suppliers were based overseas, with highest spend on suppliers based in Italy, Germany, and the USA.

3 Approach to identifying modern slavery risk

To facilitate the process of identifying modern slavery risks in our operations and supply chain, we engaged modern slavery and human rights specialists. Our initial risk identification process considered four key risk factors for modern slavery: the presence of vulnerable populations, high-risk business models, high-risk categories/sectors, and high-risk geographies. Where more than one of these risk factors are present, the likelihood of modern slavery is heightened. We have identified areas of high inherent risk of modern slavery in our operations and supply chains. However, we are confident that through our strong supplier relationships and commitment to develop our risk management approach these risks will be significantly mitigated.

3.1 Operations

We have identified two key areas of risk in our operations:

- **Industrial equipment:** We utilise a range of industrial equipment in our warehouses, which is sourced as part of operations rather than procurement. Our direct suppliers for industrial equipment are predominantly based in OECD countries. However, the deeper supply chains for the manufacturing of components of this equipment and processing of constituent raw materials intersect with the automotive parts supply chain. Certain raw materials in these supply chains are associated with a variety of labour rights violations and the use of base skill workers, indicating a high risk of exploitation of vulnerable populations.
- **Facilities management & laundry services:** We use a range of cleaning, security, groundskeeping, catering and laundry services across our sites around Australia. We typically hire these services directly, and usually with repeat contractors and service providers. However,

there is risk in the facilities management industry and laundry services due to the base skill workers and vulnerable, often migrant populations it relies upon. Labour hire agencies used to fill labour shortages in these industries further decreases our visibility of working conditions within our providers' operations.

3.2 Supply Chains

We have identified five key areas of modern slavery risk in our supply chains:

- **Mechanical parts & components:** We procure parts and components related to the automotive, heavy industry, agriculture, marine and mining industries from suppliers in a range of geographies, including the Americas, Europe and Asia. These components include various metals such as steel and aluminium as inputs, and thus brings us into contact with high labour rights risk in those supply chains, including in mining, smelting, and manufacturing. We also procure a broad range of aftermarket parts, for which there is limited visibility over the lengthy supply chain, which is likely to be reliant on base skill labour for production of goods such as silicon.
- **Oils & chemicals:** We procure chemicals for our sites, both directly and indirectly. These are used for the running and maintenance of industrial equipment, in manufacturing and servicing, as well as the health and safety of sites. This includes oils, fuels, grease hydraulic oils, lubricants and coolants. This may also include household cleaners as well as other use of standard chemical products. Chemicals used on work sites may also be procured by our suppliers, such as cleaning services, and parts manufacturers with regards to oils. We have very limited visibility over labour arrangements beyond Tier 1 in the supply chains of these chemicals, which are known for the presence of modern slavery and other human rights risks.
- **Personal Protective Equipment (PPE) & apparel:** We procure PPE and apparel directly from Australia-based providers, including apparel such as uniforms, and PPE such as rubber gloves. These suppliers manufacture or procure the PPE and apparel internationally. Certain geographies have been flagged as particularly high-risk for this sector and the widespread use of base-skill workers also represents a significant modern slavery risk.
- **Domestic freight & logistics:** We use third-party freight providers to distribute our products to and from ours and customers' sites within Australia. This encompasses manual, base-skilled services including pallet management and container loads/unloads. Dana SAC utilises additional third-party freight providers depending on the state and warehouse location, therefore increasing the number of overall service providers and consequent risk profile. The transport industry's reliance on recruitment agencies, overrepresentation of migrant workers, and shifts in supply and demand throughout the year make this a known high-risk area for modern slavery.
- **Shipping:** We engage international suppliers to ship parts and components manufactured overseas. These overseas suppliers include those with whom Dana Inc has a pre-existing relationship and other contracted directly by Dana Australia and Dana SAC, independently of Dana Inc. Whilst shipping is integral to the business, our influence is indirect, with our suppliers managing this aspect of the supply chain and those suppliers reliant on freight forwarders. The labour-intensive nature of international shipping contributes to a higher risk of the exploitation of base skill workers from high-risk geographies, with us having effectively no visibility over the nature of the work and working conditions.

4 Approach to addressing modern slavery risk

The modern slavery and human rights specialists we engaged with conducted a modern slavery diagnostic assessment (Assessment) of our current approach to managing modern slavery risk and relevant systems and controls. The Assessment was informed by key international standards and frameworks, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), and provided an analysis of key gaps and opportunities for maturing our approach to modern slavery risk identification and management. Through this engagement we were supported in developing an action plan for identifying and addressing modern slavery risks within our operations and supply chain.

4.1 Policy commitment

We are committed to addressing modern slavery risks through relevant Dana Inc policies, with a respect for human rights clearly communicated as a 'fundamental Dana policy' in the Dana Inc *Standards of Business Conduct*. Additionally, Dana Inc has a *Human Rights and Sustainability & Social Responsibility Policy* which "Prohibits forced or involuntary labour of all kinds including any form of slavery or human trafficking".

4.2 Risk assessment

Our suppliers are expected to comply with Dana Inc's *Supplier Code of Business Conduct*, which includes commitments related to human rights and modern slavery. While Dana Inc's policy suite for suppliers does not explicitly mention modern slavery, it prohibits child, forced and involuntary labour. These expectations are communicated in the 'Respect for People' section in Dana Inc's *Supplier Code of Business Conduct*, which also outlines our position on minimum wage, ethical recruitment, and employees' right to freedom of association.

Our risk assessment approach follows that outlined in Dana Inc policies and processes, such as the *Human Rights and Sustainability & Social Responsibility Policy*. Dana Inc provides suppliers with ethics and business conduct information, and expectations of doing business with any subsidiaries of Dana Inc, via the supplier section on its website. The *DANA1 Source* supplier portal is a network for managing existing suppliers, and sourcing potential suppliers, which serves as the direct communication line between Dana Inc and suppliers.

At group level, Dana Inc uses a Supplier Scorecard for all direct material production suppliers. This measures each supplier in various areas including sustainability. The sustainability criteria of the scorecard (the Supplier Sustainability Scorecard) measure environmental, safety, diversity, compliance, human rights and security risks through a questionnaire with 40 data points. Feedback received from this Scorecard is a key factor in sourcing decisions. Existing suppliers which do not provide feedback in line with our Standards of Business Conduct are subject to follow-up corrective actions.

Additionally, Dana Inc's top 500 suppliers by spend, and suppliers representing select commodities and countries based on the human trafficking and modern slavery risk analysis (covering approximately 80% of Dana Inc's direct material spend globally) were selected for 3rd party ESG data

collection activities. These suppliers represent all regions, countries, and commodities with extra focus on certain commodity and country combinations.

This captures supplier information on human trafficking and slavery including countries/jurisdictions suppliers have operations in, and potential risk factors for modern slavery in their operations. For example, whether they employ low-skilled migrant workers, whether they hire subcontractors, and whether they have activities in specific high-risk geographies. There is further in-house monitoring by Dana Inc of suppliers against global watchlists and with regards to geo-political risks.

Dana Australia (Holdings) Pty Ltd regularly procures from suppliers already engaged by Dana Inc, and therefore we can leverage this existing modern slavery due diligence in those cases.

Several of our large key suppliers have significant maturity in modern slavery risk management in their operations and supply chains and report themselves under the Act, reducing our own residual risk profile accordingly.

4.3 Training

In Australia, our employees receive formal training as part of onboarding which touches on human rights and modern slavery. The majority of our staff training is rolled out from Dana Inc's globally implemented training program, which is mandatory for all Dana salaried employees.

4.4 Grievance and Remedy

Our stakeholders have access to the *External Grievance* portal on the Dana Inc website which allows for grievance reporting. Dana Inc also maintain a permanently available global Ethics and Compliance Helpline, accessible by telephone or online, allowing staff (including all employees and contractors) to share their concerns, including anonymously where permitted by law, with an independent third-party interview specialist or via a web form.

Dana Inc's *Internal Investigations of Business Conduct, Ethics and Legal Compliance Concerns* policy outlines the investigation process for concerns and complaints raised, including potential breaches of Dana Inc policy and other ethics or legal compliance matters. Upon receipt of the report, the Chief Compliance Officer will evaluate the matter and determine the level of investigation and what appropriate actions need to be taken at local level. Personal grievances and routine safety matters will generally be handled at the facility level, while alleged violations of law or *Standards of Business Conduct* will be handled at the corporate level. Cases in related issues will be reviewed and evaluated, and the course of action will be determined by the appropriate party as identified within the policy.

5 Assessing effectiveness

Dana Inc assesses effectiveness through review of consolidated supplier data, including improvements in supplier scores and response rates, and industry benchmarking. As developing an action plan has been a focus for this reporting period, Dana Australia (Holdings) Pty Ltd has not yet assessed the effectiveness of our measures to assess and address these risks. However, we plan to

do so post-implementation of the action plan to addressing modern slavery risk. We will seek to track the progress of actions taken in the next financial year (see below for future steps).

6 Future Steps

We acknowledge that as this is our first year of reporting under the Modern Slavery Act and our activities in this reporting period have focused on assessment of our inherent modern slavery risks and relevant controls and developing our three-year implementation plan. We have identified four priority actions for managing modern slavery risk over the next financial year (beginning 1 January 2025) and will seek to develop maturity over time. These priority actions are outlined below.

6.1 Confirm Modern Slavery Commitment

We will confirm our commitment to addressing modern slavery and protecting human rights, specifically with regards to Dana's highest and most relevant modern slavery risks and stakeholders. Our commitment will be aligned with Dana Inc's relevant policies, Australian legislation, established human rights frameworks and standards, and growing customer expectations.

The commitment will be embedded in Dana's policy framework and will be communicated internally through key employee and contractor training, and externally through inclusion in supplier and customer contracts as well as on our public websites.

6.2 Collaborate with Dana Inc

To ensure consistency and encourage best practice, we will engage with our parent company to share learnings, particularly insights from Dana Inc's membership of collaborative industry action groups such as the Automotive Industry Action Group.

We will also seek to leverage Dana Inc's risk assessment policies and processes for selecting and sending questionnaires to suppliers, including questionnaire evaluations, and tracking non-conformances as well as monitoring progress of suppliers engaged by us and assessed by Dana Inc.

6.3 Establish Modern Slavery Working Group

To ensure that our modern slavery program has the necessary governance, one priority action is to establish a cross-functional modern slavery working group. This group will coordinate the delivery of our Action Plan commitments, including the above-mentioned modern slavery commitment and collaboration with Dana Inc.

This group will also monitor our own progress and that of our suppliers, and oversee the preparation of our annual modern slavery statement and review of our risk areas. We will make this working group cross-divisional to ensure consistency in our approach across the businesses and enable a coordinated response in the event of a modern slavery grievance.

6.4 Conduct Supplier Risk Assessment

To take the next step in maturing our approach to modern slavery risk assessment, we plan to identify our highest-risk suppliers (of those not assessed by Dana Inc) based on the risk factors identified above. We will then conduct a residual risk assessment to assess if the supplier is managing the inherent risks of their good or service. In doing so, we can leverage Dana Inc supplier questionnaires and expand our own data collection capabilities to better track modern slavery risk.

7 Board approval

This Statement is provided pursuant to section 13 of the Australian Modern Slavery Act 2018 (Cth). The Board of Directors of Dana Australia (Holdings) Pty Ltd is the principal governing body for the purpose of this Act and the Statement is provided in respect of the reporting entities, Dana Australia Pty Ltd and Dana SAC Australia Pty Ltd.

This statement was approved by the board of Dana Australia (Holdings) Pty Ltd on 7 April 2025.



Nick Stavrakis
Dana Australia (Holdings) Pty Ltd
Managing Director