



## Shimano Oceania Holdings Pty Ltd

### Modern Slavery Statement

Reporting Period: 1st January 2023 - 31st Dec 2023

#### 1. THE REPORTING ENTITIES

This statement has been prepared to comply with the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**) and sets out the steps taken by Shimano Oceania Holdings Pty Ltd (**Shimano Oceania**) to prevent modern slavery in its business and supply chain for the financial year ending 31 December 2023.

This statement has been prepared by Shimano Oceania on its own behalf and for each of its subsidiaries doing business in Australia.

##### 1.1 Shimano's Human Rights Commitment

Modern Slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty, dignity for another person's gain. It is a real problem for millions of people around the world, including many in the developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Shimano Oceania, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our local operations and in our Shimano global supply chain. Shimano is a global operating group, as such not all companies are subject to the *Act*. However, as a global operating company in manufacturing and sales, Shimano has taken concrete steps in its global operations to tackle modern slavery, as outlined in our statement.

To strengthen the confidence in 'Team Shimano' from all stakeholders and business partners, we engage in our daily business activities through the application of Shimano's global 'Code of Conduct'. By adhering to Shimano's Code of Conduct, Shimano Oceania maintains a sound work force, promotes cooperation and provides a safe working environment.

As stated in its 'Code of Conduct'; Shimano Oceania complies with applicable labour-related laws and regulations, and does not accept forced labour or child labour. We endeavour to work towards the realization of harmony between work and personal lives and strive to create a fair and lively workplace where employees can share a sense of accomplishment and joy.

Based on the spirit of "prioritizing safety and health above all else", we create a comfortable work environment that secures employees' health and safety and strive towards the prevention of workplace accidents.

Details of Team Shimano's global 'Code of Conduct' can be obtained from its global website, 'shimano.com'.

This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, both locally within Australia and in our global operations.

and to implement steps to prevent slavery and human trafficking during the financial year of operations.

## **2. STRUCTURE, OPERATIONS AND SUPPLY CHAINS.**

### **2.1 Structure in Australia**

All of the Australian Shimano reporting entities operate under the parent company Shimano Oceania.

### **2.2 Operations in Australia**

Shimano Oceania in Australia is a local sales and marketing company with a warehouse facility located in Sydney, providing Shimano branded goods to all locations in Australia. Shimano Oceania does not manufacture any of its Sporting goods or products.

Shimano Oceania's operations provide the Australian market with a diverse range of Fishing and Bicycle related products that cater for all types of user levels.

### **2.3 Our Overseas 'Product Supply Chains'.**

The overseas supply chain that provides goods to the Australian market is varied and complex coming from a number of locations.

The products acquired from Shimano Oceania's global affiliates range from a number of locations throughout the world.

The procurement of the material needed to make the products is sourced throughout the world including Asia, Europe and the United States.

Specifically, Shimano Oceania imports the Fishing and Bicycle related products from Shimano global companies.

Shimano Inc, located in Japan is Shimano's global Head Office for its operations.

Shimano Oceania's Fishing division sources some fishing tackle from local or overseas vendors that have met Shimano's global standards.

### **2.4 Our Local 'Operations Supply Chains'**

Generally, our local suppliers and service providers provide services such as:

- 2.4.1 Professional Services and Administrative Support.
- 2.4.2 Sales and Marketing.
- 2.4.3 Logistics services.
- 2.4.4 Information Technology Services and Support.
- 2.4.5 Facilities Management.

Locally, Shimano Oceania's suppliers are subject to the same workplace and employment laws and regulatory requirements, including abiding by all minimal award payment and conditions.



We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors.

Our supplier selection and onboarding procedures includes due diligence of the supplier's reputation, respect and compliance with the local law, compliance with health, safety and environmental standards and regulations.

If Shimano Oceania is made aware of any allegations of human trafficking/ slavery activities against any of its suppliers, procedures are in place, for immediate action against the supplier and Shimano Oceania reports those allegations to the appropriate authorities.

### **3. THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF SHIMANO OCEANIA**

#### **3.1 Risk Assessment**

Shimano Oceania continually conducts risk assessments in its supply chain.

To help in the evaluation of the risks Shimano Oceania looks at specific known risk factors as outlined in the Australian Government Guidance.

This guidance is consistent with the United Nations Guiding Principles on Business and Human Rights.

Shimano Oceania locally, takes into account:

- 3.1.1 The business services rendered by our suppliers.
- 3.1.2 The presence of vulnerable demographic groups.
- 3.1.3 Analysis and insights of labour and human rights groups.

Shimano Oceania within its global supply chain will continually take into account the following risk factors in its global suppliers:

- 3.1.4 Product sector and industry risks.
- 3.1.5 Geographic location with understanding of the 'Global Slavery Index'.

### **4. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY AND HUMAN TRAFFICKING RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES.**

#### **4.1 Policies**

Shimano Oceania operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- 4.1.1 Ongoing training of employees on appropriate business undertakings and processes on new vetting suppliers
- 4.1.2 Whistleblowing Policy – we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.

4.1.3 Shimano's global Code of Conduct – our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

#### **4.2 Supplier Due Diligence**

Shimano Oceania conducts due diligence on all new suppliers during on boarding and on existing suppliers at regular intervals.

At a global level, due diligence is undertaken in a similar framework for on boarding and on existing suppliers.

This includes:

- 4.2.1 Assessing risks in the provision of particular services.
- 4.2.2 Acknowledging the position of the suppliers and their health and safety standards, labour relations and employee contracts.
- 4.2.3 Communication where necessary for improvements to sub-standard employment practices.
- 4.2.4 Corrective action to suppliers that fail to improve their performance in line with our requirements.
- 4.2.5 Shimano Oceania requires all suppliers to attest / affirm that:
  - (a) They don't use any form of forced, compulsory or forced labour.
  - (b) Their employees work voluntarily and are entitled to leave work.
  - (c) They profile each employee with an employment contract that contains a reasonable notice period for terminating their employment.
  - (d) They don't require employees to post a deposit/ bond and don't withhold their salaries for any reasons.
  - (e) They don't require employees to surrender their passports or work permits as a condition of employment.

### **5. HOW SHIMANO OCEANIA ASSESSES THE EFFECTIVENESS OF ITS ACTIONS TO ADDRESS THE RISKS.**

#### **5.1 Measuring how we're performing**

Shimano Oceania has identified a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- 5.1.1 How many employees have completed awareness training and have access company handbook resource?
- 5.1.2 Awareness if our suppliers have rolled out an awareness and training programme that is equivalent to ours?



- 5.1.3 How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?

## **6. SHIMANO OCEANIA'S PROCESS OF CONSULTATION**

### **6.1 Awareness**

Shimano Oceania has raised awareness of modern slavery issues in various ways outlined in Shimano's global Code of conduct.

By outlining in our Staff Handbook and website appropriate behaviour and risks, we consider this will help in Shimano Oceania's:

- 6.1.1 Commitment in the fight against modern slavery.
- 6.1.2 Awareness of red flags for potential cases of slavery or human trafficking.
- 6.1.3 Commitment to letting employees know how they should report suspicions of modern slavery.

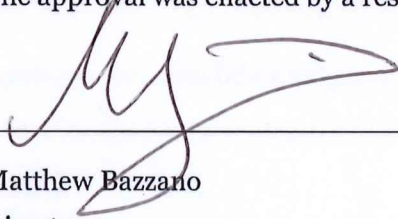
### **6.2 Training**

In addition to the awareness programme, Shimano Oceania has engaged staff in various e-learning courses and group training and resource access such as the staff handbook that contain information that raises awareness to limit the risk of enforced labour occurring. This includes information about:

- 6.2.1 Various forms of modern slavery in which people can be held and exploited.
- 6.2.2 The size of the problem and the risk to Shimano Oceania.
- 6.2.3 How employees can identify the signs of slavery and human trafficking, including unrealistically low prices.
- 6.2.4 How employees should respond if they suspect slavery or human trafficking.
- 6.2.5 How suppliers can escalate potential slavery and human trafficking issues to the relevant people within their own organisation.
- 6.2.6 What terms and guidance should be provided to suppliers in relation to slavery policies and controls.
- 6.2.7 What steps Shimano Oceania will take if a supplier fails to implement anti-slavery policies or controls.
- 6.2.8 Acknowledgement from employees that they will abide by Shimano Oceania's staff handbook which outlines proper anti-slavery behaviour.

This Statement was approved by the Directors of the principal governing body of Shimano Oceania located in Australia for 2023 Year period.

The approval was enacted by a resolution of the board on 24th May 2024.



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Matthew Bazzano

Director

Shimano Oceania Holdings Pty Ltd

Date: 24<sup>th</sup> May 2024