



Modern Slavery Statement for the financial  
year ending 30 September 2022

Seeley International Pty Ltd

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## 1.0 Introduction

Seeley International Pty Ltd (Seeley) is a socially responsible company that strives to create products that are of significant benefit to our global population, and which are environmentally friendly to the planet, and to do this in a sustainable and ethical manner. It is committed to acting ethically and with integrity in all its business dealings, including with its customers, suppliers, and other third parties.

Seeley is Australia's largest air conditioning and ducted gas heating manufacturer and a global leader in developing ingenious, energy-efficient cooling and heating products.

Seeley's vision is to lead the world in creating climate control solutions which continue to be highly innovative, of premium quality and inspirational in their delivery of energy-efficiency.

## 2.0 Reporting entity

The reporting entity covered by this statement is Seeley International Pty Ltd (Seeley) a company incorporated under the laws of Australia with its registered office at 112 O'Sullivan Beach Road, Lonsdale, South Australia 5160.

This modern slavery statement covers both Seeley and its wholly owned subsidiaries in Australia and overseas. It describes the risks of modern slavery in the operations and supply chains of Seeley and includes information about actions taken to address those risks for the financial year ending 30 September 2022.

## 3.0 Our Structure, Operations and Supply Chain

### 3.1 Organisational Structure and Business

Seeley's main business activities are the manufacture of climate control products in Australia and distribution of those products across Australia and the globe. With a global headquarters in Australia, around 500 employees and three manufacturing facilities, Seeley International exports to around 100 countries around the world through its global distributor network. Together with offices in the USA, UK, France, Italy and South Africa, the company has delivered millions of products for installations around the globe.

Seeley has wholly owned subsidiaries in Australia and overseas. Seeley is the principal operating entity of the Seeley Group. Other significant operating entities in the Group are Design & Construct Mechanical Services Pty Ltd ("DCM") (Australia), Seeley International (Europe) Limited (the United Kingdom), and Convair Cooler Corporation (USA).

Assessed according to the Walk Free Global Slavery Index, 100% of Seeley's manufacturing and service delivery operations are in countries with low-risk potential for modern slavery and human trafficking.

### 3.2 Supply Chain

Seeley International has a global supply network. The execution of our everyday operations is supported by the procurement of refined and highly technical materials and electronics, as well as skilled labour and services. In 2022 Seeley International transacted with 1750 suppliers with 80% of the annual spend being through 125 suppliers.

Seeley undertakes the following key activities in its day-to-day operations:

- Sales and Marketing
- Customer Service and product servicing
- Australian and USA based manufacturing
- Product design and improvement
- Research and development
- Procurement and Logistics
- Finance
- Engineering
- People and Culture
- Mechanical Construction Services (supplied by DCM)
- Business administration activities such as IT systems and networks

Our products are distributed across the globe through our overseas sales and marketing subsidiaries and a well-established distribution network of distributors who partner closely with Seeley in the delivery and installation of our products. We also oversee and deliver maintenance services to our customers through our own staff and trusted agents across Australia and internationally.

## **4.0 Risk Assessment**

Most of our inbound supply chain is focused on sourcing from Australia and from China. The remainder is spread across Europe (including Italy, Germany, the UK and Sweden), Thailand, India and the United States of America.

Seeley is aware that certain regions are more susceptible to issues associated with Modern Slavery, particularly those countries where migrant workers are more commonly used in industrial activities. The Walk Free Global Slavery Index provides information on which Seeley International has been able to undertake a high-level assessment of its supply chain, identifying potential areas of higher risk of modern slavery issues.

For example, China is now the second largest economy as well as the second largest importer in the world. Much of its rapid economic development has been the result of a domestic economy specialising in the production of labour-intensive, cheap goods for export. Forced labour sometimes occurs in the production of these goods, including in the manufacturing sectors.

Seeley has actively been implementing a program of seeking to educate and align suppliers from China and other moderate risk regions, initially through developing and sending a Modern Slavery questionnaire to all relevant suppliers. Over time, we will further implement a risk management program designed to aid the minimisation of potential modern slavery issues.

## 5.0 Our Approach

### 5.1 Policies

Seeley International's Modern Slavery Policy States that:

- A. it abhors any form of conduct or practice which would or might constitute modern slavery.
- B. it will fully comply with the Act and all legislative requirements relating to modern slavery.
- C. it has never engaged in any modern slavery practices and will never knowingly or deliberately do so.
- D. it is committed to taking reasonable steps to eradicate modern slavery, should it exist, from its supply chain.

Seeley International is committed to:

- establishing and maintaining procedures, training, policies and precautions to ensure its compliance with its modern slavery obligations under relevant legislation.
- keeping records that properly and accurately record all transactions, to be able to provide confirmation that it is not knowingly engaging with any entity involved in modern slavery; and
- taking reasonable steps to require its suppliers and subcontractors to comply with all applicable legislation relevant to the regions in which they operate.

### 5.2 Implementation

Our approach to the implementation of our Modern Slavery policy is progressive, enabling the company to ensure an acceptable ethical standard in all elements of our supply chain and to establish transparency in our execution of our duty of care and assurance and due diligence processes. The progressive approach will help us align our suppliers to our ethical standard, encourage open learning and create a deeper understanding of the challenge to combat modern slavery practices. Our process and performance will be continuously reviewed and improved to identify new opportunities to improve our supply chain integrity to the benefit of our customers and suppliers. Seeley International is progressively engaging with our key suppliers, sharing information and building understanding of Modern Slavery practices. We encourage our suppliers to embrace and implement aligned due diligence processes to improve the management of human rights risks within the broader supply chain.

## 6.0 Validation and Risk Management

Seeley International conducts an annual assessment of local suppliers to have them certify that they are operating in accordance with the requirements of the Modern Slavery Act and with relevant policies and procedures. This includes the review of contracts by referencing the need for our suppliers to comply with the Modern Slavery Act in our standard Terms and Conditions of Purchase.

All employees of Seeley are required to undertake training in order to ensure we create and maintain a respectful and safe workplace. This includes mandatory training in the Company Code of Conduct, Workplace Bullying and Harassment and Equal Opportunity. Employees are also required to abide by our company policies and procedures to ensure all business activities are conducted in a manner in line with our ethical and moral principles.

Seeley has a Whistle-blower Protection Policy which has been established to encourage and enable concerns regarding illegal or improper practices, including modern slavery concerns, to be reported. Under the Policy reports can be made via an external whistle-blower hotline service. Reports can be made anonymously, and whistle-blowers are protected under the Policy as required by the relevant provisions in the Corporations Act. Seeley will investigate reports and where the concerns are substantiated, take appropriate action.

## **7.0 Continuous Improvement**

### **7.1 Our Key Actions for FY22**

- Reinforced with our Purchasing and Logistics teams the importance of identifying and assessing modern slavery risks in our supply chain.
- We have included compliance with the Modern Slavery Act in our Supplier Selection and Supplier Performance Review procedures, which are formally documented and externally audited as part of our ISO quality management system.
- We are proceeding to include a reference to compliance with the Modern Slavery Act in our supply contracts.

## **8.0 Monitoring Effectiveness**

### **8.1 Key Performance Indicators**

We have used key performance indicators (KPIs) to measure how effective our actions to identify and address modern slavery practices in any part of our operations and supply chains have been.

These include:

- Completion rates for modern slavery awareness training for our Purchasing staff (100%).
- Number of moderate risk suppliers completing our modern slavery questionnaire, which is currently running at a 75% response rate.
- Less than 10% of the respondents reported feedback of potential concern. Of these, some 50% are covered by an active supplier exit strategy while we are working with the balance of these suppliers to address our remaining concerns.
- The number of modern slavery breaches identified (nil in the reporting year) and remediated.

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

Meanwhile, we also acknowledge that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward.

## **8.2 Reporting Entities**

Seeley consulted the relevant companies it owns or controls in the development of this statement.

## **9.0 Conclusion**

Seeley acknowledges how important it is to address modern slavery risks in its supply chain and take all reasonable steps to eradicate it. The steps that we have taken continue our efforts in this area. Seeley is committed to the ongoing delivery of these initiatives and working with its suppliers and other relevant parties to achieve these goals.

This statement has been reviewed and approved by the Board of Seeley International Pty Ltd.

Signed:

A handwritten signature in black ink, appearing to read 'Jon Seeley', with a stylized, cursive script.

**Jon Seeley**  
Group Managing Director  
Seeley International Pty Ltd

Date: 31 March 2023