

Modern Slavery Statement 2024

Robert Bosch (Australia) Pty Ltd, ACN 004 315 628



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Introduction

The Bosch Group is a leading global supplier of technology and services. It employs roughly 429,000 associates worldwide (as of December 31, 2023).

The group generated sales revenue of 91.6 billion euros in 2023. Its operations are divided into four business sectors: Mobility, Industrial Technology, Consumer Goods, and Energy and Building Technology. Universal trends such as automation, electrification, digitalization, and connectivity, as well as an orientation to sustainability, are increasingly determining the group's business operations. In this context, Bosch's broad footprint as a global and diversified technology company strengthens its innovativeness and robustness.

Bosch uses its proven expertise in sensor technology, software, and services to offer customers cross-domain solutions from a single source. It also applies its expertise in connectivity and artificial intelligence to develop and manufacture intelligent, user-friendly, and sustainable products. With technology that is "Invented for life". Bosch wants to help improve quality of life and conserve natural resources.

As a globally operating company, we recognize our corporate responsibility to respect human rights. We contribute to improving human rights conditions worldwide by implementing due diligence obligations concerning human rights in our operational processes. At the same time, we actively demand respect for human rights in our global supply chains as well and take appropriate remedial action in the case of violations.

Our business activity is aligned to the United Nations Guiding Principles on Business and Human Rights, and we comply with the requirements of the National Action Plan for Business and Human Rights applicable in Germany.

We implement the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG) and respective legislation worldwide including the Australian Commonwealth Modern Slavery Act 2018 (the **Act**).

We likewise expect our business partners to commit to respect human rights, to establish appropriate due diligence processes, and to oblige their own suppliers and other third parties to comply with corresponding principles to the best of their ability.

Bosch has had a presence in Australia since 1907, opening its first wholly owned subsidiary, Robert Bosch (Australia) Pty Ltd (**Robert Bosch Australia**) in 1954. Our headquarters and technical centre are in Clayton, Victoria.

Robert Bosch Australia is committed to improving our practices and driving out any acts of modern slavery and human trafficking that may exist within our supply chains. We acknowledge the requirement to act in accordance with the Commonwealth Modern Slavery Act 2018 (the Act) and will ensure transparency within our organisation and with our suppliers of goods and services.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Code of Business Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to guard against slavery and human trafficking from taking place anywhere in our supply chains.

Reporting Entities

Robert Bosch Australia is a reporting entity under the Act and agrees to abide by the requirements of the Act and this statement. Bosch Automotive Service Solutions Pty Ltd and Motec Pty Ltd are wholly owned subsidiaries of Robert Bosch Australia, and while not reporting entities under the Act, it acts in accordance with the same values and principles toward the topic of modern slavery as Robert Bosch Australia. Their directors recognise that their practices in this area are in line with those outlined in this statement for Robert Bosch Australia.

Separate statements are being lodged by related bodies corporate of Robert Bosch Australia, which are reporting entities under the Act, namely Bosch Rexroth Pty Ltd, BSH Home Appliances Pty Ltd and Bosch Security Systems Pty Ltd.

Both Robert Bosch Australia and Bosch Automotive Service Solutions are headquartered in Clayton, Victoria and Motec Pty Ltd located in Croydon North, Victoria. Robert Bosch Australia currently employs over 800 employees, as of December 2023.

Social Responsibility at Bosch

Globally, Bosch will not collaborate with any suppliers who have been shown to fail demonstrably and repeatedly to comply with basic International Labour Organization (ILO) standards.

The assumption of responsibility for society and future generations has a long tradition at Bosch. In the early days of the company, Robert Bosch himself pioneered the launch of welfare programs for associates and their families; in non-business areas, too, he played an active philanthropic role. Today, the Robert Bosch Foundation promotes health care, international understanding, welfare, education and training, art, culture, and science.

Robert Bosch GmbH is a current signatory to the [UN Global Compact](#) and has been for many years. Bosch is also a member of the Responsible Minerals Initiative (RMI) and requires the compliance of its suppliers with the [Bosch Group Policy for Conflict Raw Materials](#).

Combining the pursuit of economic goals with consideration for social and environmental factors is a priority at Bosch. We accept that our actions must accord with the interests of society. Above all else, we design our products and services in the interests of the safety of people, the economic use of resources, and environmental sustainability.

The following are links to Bosch's latest [Global Sustainability Report](#) for 2023, our [Sustainability and Compliance Strategies](#) and the [Basic Principles of Social Responsibility](#) at Bosch.

In this statement the Directors of Robert Bosch Australia affirm their commitment to common principles of social responsibility and requirements held within the Act.

Operations and Supply Chains

We regularly audit our suppliers both preventively and when the situation demands. Such an audit is generally carried out when we commence new supplier relationships, with the findings of our risk analyses then determining the type, scope, and frequency of the audits. Different methods are used depending on the prevailing framework conditions and the specific risk situation: verifications performed by Bosch itself (quick scans and drill-deep assessments), third-party audits, and self-declarations by suppliers.

Compliance with human rights and environment-related requirements already plays a crucial role when selecting new suppliers and is a prerequisite for subsequently entering into a contractual relationship. The corresponding timing and the audit methodology used are determined by the respective purchasing organizations according to the risk. As part of the sanctioned party list screening, a check is additionally carried out prior to the conclusion of a contract to determine whether potential business partners are included in sanction lists or affected by embargo regulations.

If there is reasonable suspicion or concrete evidence of a violation of human rights or environment-related obligations by a supplier, we systematically investigate the facts of the matter. If we discover breaches of duty, we work to ensure that these are rectified immediately. Should this not be possible in the foreseeable future, we expect the supplier to present a plan and a specific time schedule for ending the breach and minimizing its effects. We track and monitor implementation of the measures – also by consistently requesting documented proof or by performing reassessments on site.

If a supplier does not appear willing to fulfill our requirements or introduce corresponding measures, Bosch reserves the right to terminate the contractual relationship in extreme cases. Active suppliers found to be engaged in unlawful conduct or whose sustainability performance is deemed inadequate, such as a lack of effort in dealing with human rights or environment related requirements, may be excluded by Bosch from any further awarding of contracts.

If there is reasonable suspicion of misconduct on the part of an indirect supplier, we initiate targeted preventive measures within the scope of our possibilities, such as controls and, if necessary, appropriate remedial actions through our business partners.

Actions Taken to Mitigate Human Rights And Modern Slavery Risks

Risk Analysis

The responsible corporate departments perform annual and, if necessary, event-driven risk analyses to improve understanding of human rights and environmental implications, identify potential vulnerabilities, and develop suitable preventive measures. This is done using standard evaluation methods to ensure comparability between the different functional areas. The risk analysis comprises four steps:

Risk Identification

The responsible corporate departments identify areas where risks might occur (risk commodity). This could be a country, a plant, or a supplier.

Risk Assessment

Risks are assessed using a uniform model and presented according to a standardized scale at Bosch to ensure the comparability of the results. Assessment criteria include the potential severity and impact of a potential violation, the irreversibility of consequences, and the likelihood of a risk occurring. In addition, we also consider any indications of risks we receive from internal processes, such as the internal control system or internal audits, as well as from the public realm, from our partners in the supply chain, or through our reporting systems.

We adhere to clearly defined principles when assessing risks. The corporate departments assess the risks relating to their own business activities in a top-down or bottom-up approach (e.g., through questionnaires), depending on the processes in question. We developed a grading system for risks in the supply chain and use international indexes such as the Global Slavery Index or the ITUC Global Rights Index to assess the respective supplier's potential risk.

A supplier's sustainability performance – such as audit results, acceptance of the Code of Conduct for Business Partners, or external certifications – is likewise included in the assessment and used to substantiate the results.

Prioritisation

Risks are prioritized in each functional area with the aim of targeting the use of preventive measures and enhancing existing processes. The results of the risk assessment determine the prioritization within Bosch's direct sphere of influence. Additional factors are considered in the supply chain such as the extent to which each supplier contributes to causing a risk and the possibilities Bosch must exert influence.

Measures

Should deficiencies arise in the risk management system, adjustments must be made, and relevant measures introduced in the corporate departments to counter these directly in the risk field concerned. In addition, risks that affect several functional areas or risk fields are managed by the human rights committee for the entire Bosch Group so that comprehensive measures can be developed.

We systematically review reports we receive through our reporting systems, for example, or that arise within the context of media monitoring and decide on the need for an event driven risk analysis depending on the findings.

Potential Risks for Human Rights in the Company's Own Operations and at Direct Suppliers

Essential employee rights are derived from human rights, which is why we also pay special attention to people's situations at the workplace. First and foremost, we consider the risks associated with forced labour within our own operations and at direct suppliers (tier 1), in line with the definition of the International Labour Organization (ILO Convention 29, Article 2).

In 2023, we took a closer look at the topic of recruitment fees, that is payments by employees to their employer or to third parties during the course of the recruitment process (e.g. agents) to secure a position.

This was done as part of our annual risk analysis and considered both in our own operations and those of direct suppliers. In our efforts to ensure a high level of protection for our associates, we identified the need for a group-wide, substantiating policy to express Bosch's rejection of such practices by third parties, which may be an indication of forced labour. The plan is to publish the policy in 2024. Future risk analyses should also focus on this topic.

Potential Risks for Human Rights Further Down the Supply Chain

Raw materials extraction and its circumstances are often particularly risk-sensitive from an ecological and social point of view. While Bosch itself only sources very few raw materials directly, potentially high-risk raw materials are processed in primary products and materials.

In an analysis of raw materials, we identified 15 high-risk raw materials that Bosch uses and launched specific risk-mitigating programs. These programs are managed by the Supply Chain Management, Sustainability and Safety corporate departments and implemented in the divisions.

A standard process was established in 2023 for the identified raw materials, which is binding upon the purchasing divisions. Following analysis of the material-specific risks, specific target visions are defined accordingly for each high-risk raw material along its generic value chain. These visions reflect Bosch's expectations of its suppliers, such as a desired level of certification, and will be the focus of further corporate activities in the future.

Preventing and Mitigating Risks

We develop reasonable measures and implement these consistently to counter identified risks and their impact on human rights or the environment. The effectiveness of preventive measures is checked regularly, for example through audits, and adjustments are made if necessary. In the event that human rights or environment-related obligations are violated within the company's own operations or at a supplier, we immediately seek an appropriate remedy.

Uniform principles are applied throughout the Bosch Group to prevent and mitigate risks. Individual elements of prevention are organized slightly differently in order to take account of the range of business models and supplier relationships within the Bosch Group.

Preventing and Mitigating Risks Within the Company's Own Operations and at Direct Suppliers

Bosch's Code of Business Conduct applies to all associates and requires them to comply with the relevant laws and internal regulations. This is especially the case in relation to ensuring respect for human rights. We provide regular training for associates on the content of the Code of Conduct.

Clearly defined requirements for our security personnel, training on human rights, and far-reaching supervision measures aim to prevent behavior that violates human rights vis-à-vis our associates and third parties.

Bosch's Code of Conduct for Business Partners requires that our suppliers comply with social and environmental standards and is therefore critical for collaboration between our suppliers and Bosch. We also expect our suppliers to use their best efforts to require their own suppliers and other third parties to comply with the appropriate principles.

Further information on the Bosch Group's Code of Conduct and the Bosch Code of Conduct for Business Partners can be reviewed via the following links:

[Code of Business Conduct](#)

[Code of Conduct for Business Partners](#)

Since the Bosch Group's updated Code of Conduct for Business Partners was published in 2022, current suppliers of direct materials have been asked to actively confirm the Code of Conduct – by the end of 2023, around 71 percent of suppliers contacted had already acknowledged the Code of Conduct (prior year: 47 percent). We are seeking a further increase in 2024.

Regarding indirect materials (materials and goods that are not directly related to products), we endeavor to have the Code of Conduct acknowledged each time a contract is awarded. The confirmation rate is currently 97 percent and remains unchanged since the previous year.

Considering the number and diversity of our suppliers, should it happen that confirmation is outstanding in some cases, we address these cases in the context of our risk management. In terms of environmental protection, we expect our suppliers to set up and continuously refine, within reason, an environmental management system certified to ISO 14001.

Supplier Assessments - Four Methods

Four methods are used in the Bosch Group in our regular assessment of our suppliers' sustainability performance. Self-declarations by suppliers and third-party audits are used to complement the quick scans and drill-deep assessments that Bosch performs itself.

Method 1 - Quick Scans

Quick scans are based on a checklist of specific criteria relating to the environment, occupational health and safety, and human rights. Supplementary questionnaires are used, for example, for selected material groups and logistics services. Quick scans are carried out by qualified Bosch associates from purchasing or quality functions, frequently as part of regular on-site visits to suppliers. In 2023, we conducted around 3,200 quick scans (prior year: 3,300). From 2024, we intend to increasingly align the intensity and the focal areas of the quick scans to the results of the annual supplier risk analysis.

Method 2 - Drill Deep Assessments

Drill-deep assessments are used mainly in potentially high-risk regions or industries, or when there are any specific indications of non-compliance. Irrespective of any other visits to suppliers, drill-deep assessments are carried out by internally licensed assessors and take between one and two days. They are announced so as to ensure that the required experts – such as environmental or safety officers – are onsite. Besides an in-depth assessment of the three areas covered by the quick scan – the environment, occupational

In 2023, around 69 percent of our relevant direct materials suppliers had such a certificate. Suppliers without manufacturing operations are not required to adopt an environmental management system of their own, but they do have to implement corresponding measures.

health and safety, and human rights – they also comprise an analysis of working conditions and compliance management. The assessment covers the practical implementation as well as system-based requirements, such as in the form of guidelines, which allow conclusions to be drawn about the maturity of the organization. Bosch conducted around 120 drill-deep assessments at suppliers in the 2023 reporting year (prior year: 100).

Method 3 - Self-Declarations

Self-declarations are eligible as a means of checking suppliers where the risk is assumed to be low and there have been no issues in the past. The prerequisite is that the assessed risk of the group of suppliers or of the material group is queried and trustworthy documentation is provided to substantiate that the questions have been truthfully answered. To ensure uniform and high standards, new questionnaires must be approved by a group of experts before they are introduced. If there is a heightened risk for a supplier, third-party audits can be initiated for checking the supplier. Performed by external third parties, such audits must at a minimum satisfy the requirements of a drill-deep assessment in terms of content and process. Together with automotive manufacturers, suppliers, and other associations, an audit standard was developed in the “Responsible Supply Chain Initiative” (RSCI) ([RSCI Program Information](#)), which is to be used at plant level in the automotive industry. The roll-out phase commenced in 2023 following pilot audits with the nomination of suppliers based on the annual risk analysis.

On aggregate, we assessed around 76 percent of our relevant direct materials suppliers using the various methods by the end of 2023. We also assessed 85 percent of indirect materials suppliers who are particularly relevant in terms of country risk and field of materials risk. Most of these were on-site assessments.

The insights we have obtained from the various assessments show that suppliers meet our requirements for the most part. Improvements were required in individual cases, and Bosch expects these to be implemented. Priority areas in 2023 also concerned aspects of environmental protection as well as occupational health and safety, such as preventing hazards in transport and high-bay warehousing processes.

Method 4 - Training

Our associates in the purchasing function receive web based as well as classroom training. In 2022, a new training video was published that became a mandatory part of the learning curriculum for all purchasing associates in 2023. It provides an overview of the current strategy in purchasing and the requirements for suppliers in terms of climate action and human rights. More than 4,000 associates took part in this training in 2023.

Another training module that has already been in place for several years provides associates who manage suppliers not only with a general overview of topics, but also with information on the requirements expected from suppliers and the procedure for the quick scans. We offer training courses for suppliers so that they can further consolidate their knowledge of our expectations in relation to compliance with human rights and environment related standards. In 2023, the webinar on the topic of sustainability was accessed more than 2,600 times.

Stakeholder dialogue and involvement in associations

Bosch regularly presents awards to its best suppliers around the world in recognition of their performance. The Bosch Global Supplier Award is bestowed every two years. 46 suppliers from 11 countries were distinguished in 2023. The Supplier Award in the special “Sustainability” category was also awarded for the second time. Finalists in this category have at least an “A” rating from CDP and make an exemplary contribution to climate neutrality. Bosch is involved both in the VDA (Tisax) Sustainability Committee, the Responsible Supply Chain Initiative RSCI, and the “Sector Dialogue Automotive Industry” of the German Federal Ministry of Labor and Social Affairs. We are also active at a cross-company level in “econsense”. Within the forum’s “Human rights and supply chain” cluster, we work together with other partners on how to responsibly design global supply chains.

Preventing and Mitigating Risks Further Down the Supply Chain

We want to mitigate risks related to human rights and the environment that are inherent in raw materials extraction through our involvement in various programs and measures.

In the case of raw materials that can have adverse effects on people and the environment, we also regularly review the risk exposure and counteract potential risks, taking into account the corresponding OECD guidelines and the legal parameters.

We drew up a social study on human rights risks in the reporting year to complement the results of an environmental study conducted in 2022. The study creates transparency in relation to the generic supply chains of the 15 high-risk raw materials identified as well as the associated process-related and country-specific risks.

This resulted in the creation of a matrix of the identified raw materials and their weighted risks along their generic supply chains.

Conflict Minerals

As early as 2019, we issued the Bosch Group Policy for Conflict Raw Materials, which describes our approach to the conflict minerals cassiterite (tin), coltan (tantalum), tungsten, and gold. It is integrated in specific agreements for relevant suppliers.

Bosch participates in conflict minerals reporting and in cobalt reporting in accordance with the Responsible Minerals Initiative ([RMI](#)). In addition, we are working toward ensuring that suppliers of materials containing conflict minerals or cobalt have the smelters in their supply chains certified by the RMI.

Based on the resulting risk areas identified, the existing target visions for the materials 3TG 26, cobalt, and rare earth elements were examined in 2023 and, where necessary, adapted or confirmed. We are therefore continuing to pursue the vision of establishing 100 percent certified smelters in our supply chains in the future and have also begun to communicate the associated ambition to our suppliers.

Material-specific target visions were likewise defined for aluminium, graphite, and lithium, which were the focus materials in 2023. In 2024, we will devote ourselves to the materials copper, manganese, nickel, and platinum. As scarcely any certification standards exist on the market as yet for many materials, we will continue to closely monitor the situation so that we can take emerging standards into account in our strategy in due course.

In the case of lead, virtually 100 percent of direct suppliers and one tier-1 supplier for every direct supplier were audited in 2023 using a specific CSR quick scan ([CSR](#)).

In 2023, the reported certification rate for cobalt was increased to 81 percent from 69 percent the previous year, the certification rate among smelters was 91 percent for tantalum (prior year: 97 percent). At the same time, 67 percent (prior year: 87 percent) of tungsten smelters are certified, while the rate for tin smelters lies unchanged at 80 percent (prior year: 80 percent). The rate for gold was lower at 55 percent than in the previous year (60 percent).

We want to reverse this negative trend in 2024.

On request, Bosch provides customers with the RMI 's Conflict Minerals Reporting Template, which is recognized by authorities such as the U.S. Securities and Exchange Commission. It can be obtained via established platforms, such as iPoint and HP CDX, or it can be sent to individual requesting parties.

Further Mechanisms to Mitigate Risk

Code of Business Conduct Oceania

Robert Bosch Oceania's Code of Business Conduct is a mandatory training requirement for all employees of Robert Bosch Australia, Bosch Automotive Service Solutions and Motec Pty Ltd.

This code covers all aspects of our Corporate Social Responsibilities, compliance, and organisational responsibilities.

All employees must complete this training at least once every two (2) years.

Whistle-Blower Policy

Robert Bosch Australia's whistle-blower policy and compliance hotline allows all employees at all levels to raise issues relating to any matter anonymously. All information provided via this service is taken extremely seriously.

The Central Compliance and Central Security Managers investigate all whistle-blower / compliance issues raised.

Compliance Reporting

The Oceania Compliance Manager supplies a monthly report to the Central Compliance team in Germany on all compliance matters raised, including those from the whistle-blower and Global Business Partner Screening systems.

"Drum Cussac"

This system supplies country-by-country security information, risks, customs and identified issues. Whilst primarily used for travel security, it is now being more extensively used to review supplier countries to receive immediate and up to date information on current issues.

Global Corruption Risk Assessment

Robert Bosch Australia conducts a Corruption Risk Assessment every two (2) years. The results of this assessment are provided to our central compliance division to supply insight on global risks to our organisation.

Effectiveness Reviews

All identified risks are fully assessed, with corrective actions developed, discussed, and appropriately disseminated.

- All corrective actions are tracked to completion.
- Audits of the effectiveness of all systems are conducted regularly.
- Onsite effectiveness reviews are completed in selected suppliers.
- This is monitored via the Robert Bosch Australia finance and purchasing teams.

Compliance Training

Robert Bosch Australia conducts several compliance-based training sessions for staff. The following training is mandatory for those with roles relevant to the subject matter:

- Code of business conduct
- Dealing with classified information
- Anti-corruption
- Gifts and gratuities
- Product development code
- Product safety and liability
- Anti-trust law
- Export control

Consultation and Communication

During our compliance team meetings, the team (which may include a cross section of senior leaders from across the business) assesses and identifies company wide compliance topics, including modern slavery risks and mitigation measures, and works toward continuous improvement across all organisational divisions.

In addition to this process and introduced as part of our Code of Business Conduct training is our “Compliance Dialogue.”

Compliance Dialogue is where all managers and employees, at least quarterly, discuss compliance matters, risks, and risk mitigations within their working teams. This dialogue includes review and discussion of modern slavery for relevant personnel, and several other topical compliance matters.

The compliance dialogue is a vital component to ensuring that these topics remain “front of mind” for all Robert Bosch Australia personnel.

Supplier Information Australia

Robert Bosch Australia sources products and materials from around the world. Over 60% of our products and materials come from Bosch facilities in countries outside of Australia. Many products and materials come from, Germany, United States of America, Singapore, and Australia.

Within Australia, Bosch’s only manufacturing plant is dedicated to the production of automotive diodes and is located at the Clayton site. All other products / materials are sourced externally.

As of 31 December 2023, in relation to Robert Bosch Australia:

- 15 direct* suppliers.
- 351 indirect** suppliers.
- AUD\$25,145,504 of goods from direct suppliers.
- AUD\$68,242,779 of goods from indirect suppliers; and
- Top three (3) supplier countries:
 - o Australia
 - o Germany
 - o New Zealand

Our suppliers and supply chain fall into the following broad categories:

- Transport and Logistics
- Electrical manufacturing
- Facilities management
- Internet of Things (IOT) technology
- Automotive aftermarket
- Power tools
- Electric drive chain technology
- Automotive electronic safety features
- Engineering
- Mobility Solutions

**Direct supplier - Purchased material*

***Indirect supplier - Support items (e.g., labour hire, marketing, plant, transport)*

Conclusion

Robert Bosch Australia, in line with the global Bosch organisation, is dedicated to enhancing our Corporate Social Responsibility. As a group we have invested heavily in information systems and practices to ensure we set the standard in how a modern organisation should act locally and globally.

The information contained within this statement demonstrates our commitment to the elimination of modern slavery and criminal work practices, and our desire to have Corporate Social Responsibility at the forefront of all our operations.

Declaration

This statement is made in accordance with the Modern Slavery Act (Cth) (2018) and is accurate and correct as at the time of submission. This statement represents reporting for the period 1 January – 31 December 2023

Gavin Smith
Director

Nicole Sharman
Director

This statement was approved by the board of Robert Bosch (Australia) Pty Ltd.