



Dexion Modern Slavery Statement

Message from the Group Managing Director

Dexion's culture is based on respect for the rights, freedoms, safety and health of our employees, and we recognise that these values are important to convey through our supply chain.

We also understand the importance of knowing where raw materials, product components and services are sourced from. It's not just a matter of quality assurance. Building strong relationships with our suppliers provides us with a window into their operations and the opportunity to influence positive change for workers.

Dexion first developed its Code of Ethics in 2017 with the objective of gaining transparency and the accountability of its suppliers as to worker welfare.

Importantly, Dexion's supply chain includes companies which are either owned or commonly controlled by Dexion's parent company, the Tech-Link Group. No one knows or understands our manufacturing facilities and sourcing of material like we do.

Our continued commitment to identifying and addressing any modern slavery risks in our supply chain is supported by a robust human rights framework in our own operations and ensuring that these are shared by others in our supply chain.



Damian Cross
Group Managing Director
Dexion Asia Pacific

**“Nothing is more important
than the welfare of our people.
No commercial decision takes
priority over their health and safety.”**

This Modern Slavery Statement is published in accordance with Australian Modern Slavery Act 2018 (Cth) for Dexion headquartered in Sydney, Australia. It covers financial reporting year 2020 and is a joint statement applying to Tech-Link Storage Engineering (Australia) Pty Ltd and its wholly owned subsidiary companies conducting business in Australia.

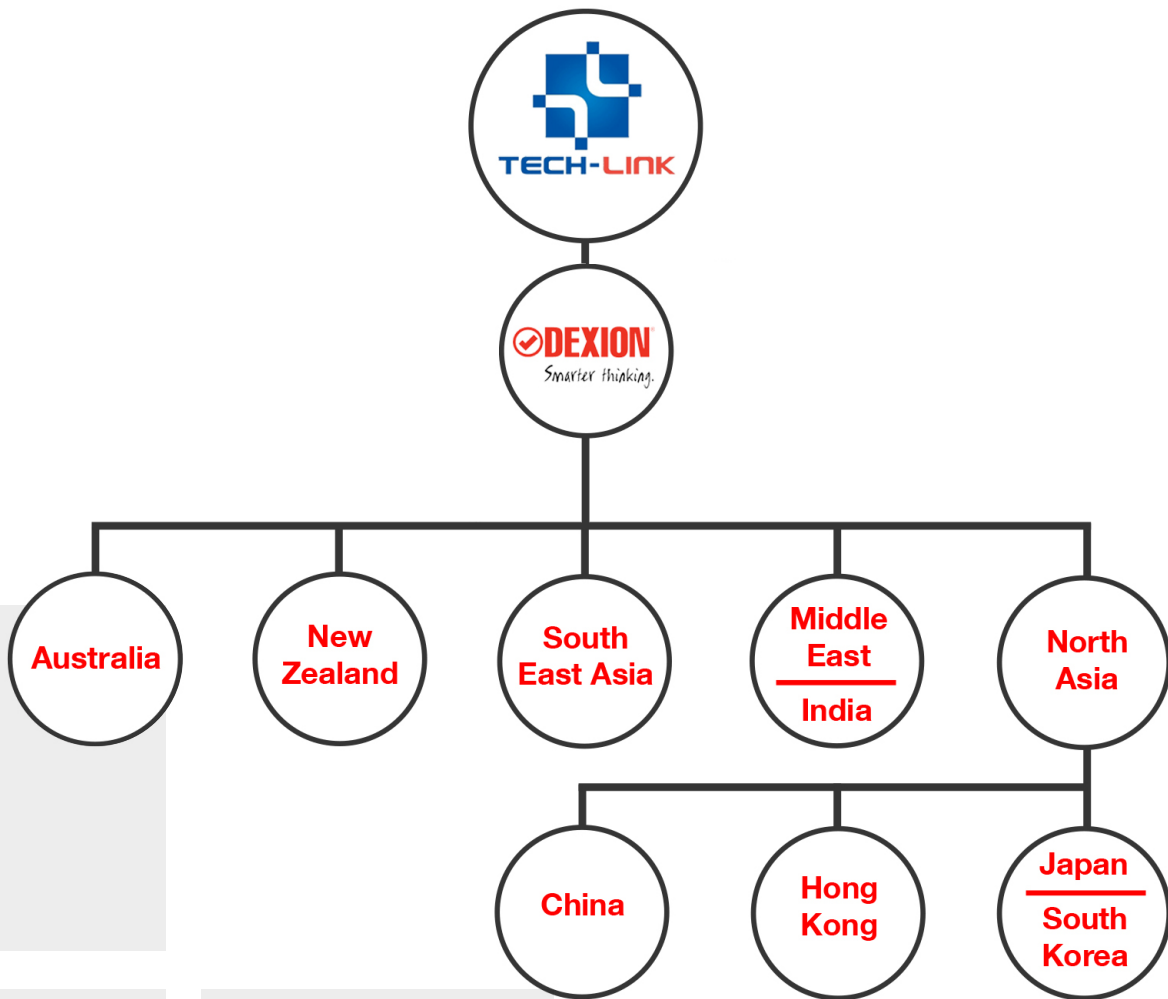
Dexion's Corporate Structure

Tech-Link Storage Engineering (Australia) Pty Ltd is the parent company of the following Australian companies:

- **Dexion (Australia) Pty Ltd**
- **Dexion Commercial (Australia) Pty Ltd**
- **Dexion Integrated Systems Pty Ltd**

Tech-Link Storage Engineering (Australia) Pty Ltd also owns subsidiary companies which operate in New Zealand, Malaysia and China.

Some of these companies, such as Dexion Malaysia Sdn Bhd, manufacture products and supply product components which are sold in Australia by Dexion. Accordingly, Dexion is in the unique position of having direct knowledge of a significant proportion of its first tier supplier's operations.





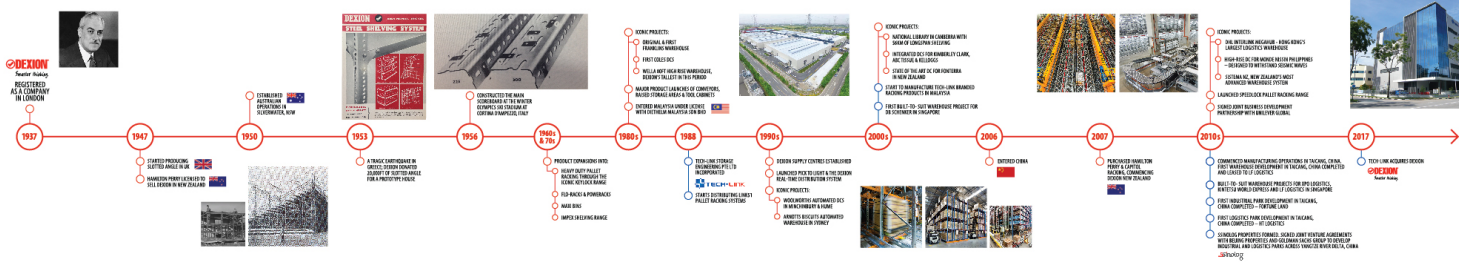
About Tech-Link

Dexion Asia Pacific was acquired in 2017 by the Tech-Link Group.

Founded in 1988, Tech-Link has progressed from an importer of storage equipment to a global storage, distribution and material handling specialist.

The Tech-Link Group is engaged in the research, design and development of logistics supply chain systems and solutions. Leveraging on this expertise, Tech-Link has also successfully developed Built-to-Suit logistics facilities for leading international third party logistics operators and high quality industrial and logistics facilities in Asia.

The acquisition of Dexion complemented Tech-Link's portfolio and has resulted in synergies and opportunities which has benefitted the group. Together with Dexion, Tech-Link Group's annual turnover exceeds \$200 million.



About Dexion

Dexion is a leading international industrial and commercial storage solutions provider headquartered in Australia with over 80 years of history.

From the first slotted angle shelving system invented by Dexion founder Comino Demetrius in 1937, Dexion has been built on innovation and a commitment to excellence. Dexion products and services are designed to help businesses and industries around the world manage complex requirements for safe and secure storage, space optimisation and profitability.

Dexion has partnered with some of the world's most recognised companies to provide them with customised storage and materials handling solutions. With a team of over 300 highly skilled professionals and a presence across Australia, New Zealand and Asia, Dexion delivers seamless, integrated solutions that companies rely on to protect their investments and streamline operations.

Dexion's manufacturing and supply operations span three areas:

- **Industrial**
- **Systems Solutions**
- **Commercial**

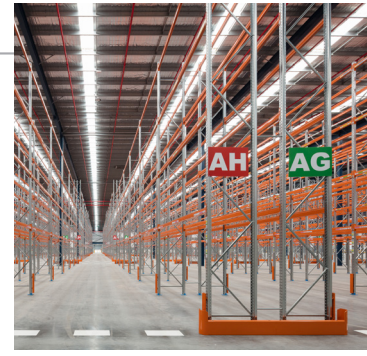
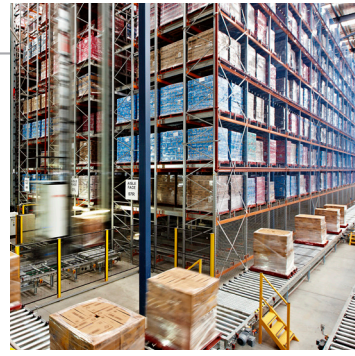
Dexion Industrial

Going back to its beginnings, Dexion has been a leader in quality and reliable industrial storage and shelving solutions. With ingenuity and purposefulness Dexion develops smarter solutions to meet specific business needs for industrial storage and shelving, materials handling and inventory management.

Industrial racking components supplied by Dexion are subject to extensive testing for structural strength and serviceability carried out at the Materials and Structural Testing Laboratories of the University of Technology, Sydney.

Dexion Industrial products include:

- Pallet racking to suit selective or high-density rack designs with a range of accessories to protect and optimise space utilisation
- Narrow aisle and cantilever formats to suit products of all sizes
- Multi-purpose roller flow storage systems for pallets and cartons
- Customised steel or rack supported raised mezzanine decks to provide uninterrupted space on the floor and above ground storage
- Long span shelving for small parts pick and pack

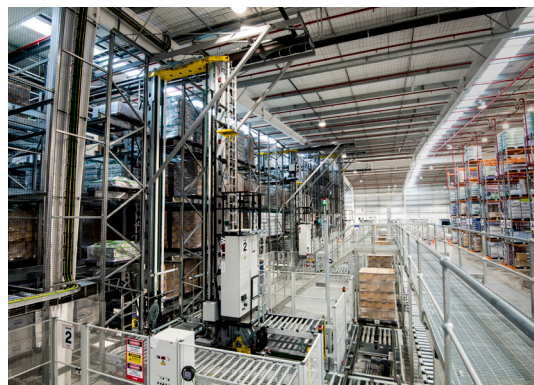


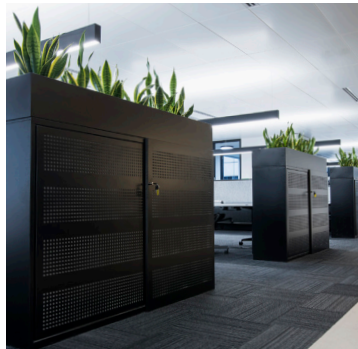
Dexion System Solutions

Dexion System Solutions designs, develops and implements integrated automation solutions such as zone routing solutions, automated storage and retrieval solutions and goods to person solutions. It has expertise in logistics system design, software development and engineering, solution implementation and logistics operations.

Dexion System Solutions products include:

- Automated storage and retrieval systems
- Goods To Person systems
- Zone routing systems
- A range of specialised solutions tailored to customer needs





Dexion Commercial

Dexion Commercial specialises in the design, manufacture and sourcing of storage solutions for commercial environments. Dexion products are designed and built to optimise space whilst performing to the highest standards, ensuring our customers enjoy long-term value for money. Dexion Commercial's extensive product offer allows us to solve virtually any storage need for customers in any industry.

Dexion Commercial products include:

- Shelving
- Compactus
- Cabinets & planter boxes
- Lockers
- Locks
- a range of specialist products for storage of Artefacts, Art Works, Weapons and Medical

Our product solutions

 **DEXION** | INDUSTRIAL DOORS

 **DEXION** | HDS SHUTTLE

 **DEXION** | HVLS FAN

EASY FIT
BY DESIGN

 **DEXION**[®]
Smarter thinking.

compactus[®]

 **DEXION** | RDSL^T WMS

 **DEXION** | HDS OMNI

 **DEXION** | Smart Roller CONVEYOR

Dexion Supply Centres

Dexion Supply Centres are independently owned businesses which provide retail outlets for Dexion products and solutions all over Australia and New Zealand.

Dexion Supply Centres have long established relationships with Dexion, a deep understanding of Dexion products and are specialist service providers.

From commercial storage and shelving, to warehouse pallet racking and automated materials handling systems, Dexion Supply Centres offer solutions to businesses of all different sizes.



Values - The Dexion Advantage

Quality

Lifetime Warranty, Quality assured and compliant to Australian and European steel storage standards

Experience

With over 80 years of storage and logistics expertise, we're trusted by leading companies locally and globally

Innovation

Engineering products that embrace smarter thinking and better, safer processes

Dexion's Code of Ethics

In 2017, well before the federal or NSW modern slavery legislation, Dexion demonstrated its early commitment to ethical sourcing, by developing its first Code of Ethics. The Code defined minimum standards to be met by manufacturers and suppliers of Dexion's products.

Firmly based on the respect for Human and Labour Rights the Dexion Code of Ethics reflected standards sourced from International Labour Organisation Conventions prohibiting:

- Forced labour
- Financial Bonding
- Restrictions on ability to leave employment
- Restrictions on ability to leave work or housing facilities
- Child Labour
- Retention of identity documents
- Discrimination
- Harsh or inhumane treatment
- Excessive working hours

Dexion's Code of Ethics also extended to other areas of ethical and responsible conduct including setting standards for:

- Safe and hygienic working conditions
- The availability of first aid equipment
- Safe and appropriate housing conditions
- Full and proper payment of wages and benefits
- Environmental protections and sustainability
- Ethical business conduct, including anti-bribery and corruption

Dexion's Code of Ethics is expressly based on principles that all persons who maintain any type of direct or indirect kind of employment, economic, social and/or industrial relationship with Dexion are treated fairly and with dignity.



Governance

The Board has high level oversight of compliance issues with international implications including associated with supply chain quality.

Dexion has a specifically convened Ethical Sourcing Group comprised of representatives across Dexion's various operations in the following roles:

- Chief Financial Officer
- Head of Industrial and Shared Services
- Head of Commercial Solutions
- Head of Systems Solutions
- National Marketing Manager
- WHS Manager

The Ethical Sourcing Group's activities include supplier risk assessment, review and implementation of the Code of Ethics and investigation and addressing modern slavery issues. The Group has been guided in their activities with specialist legal and compliance support.

The Ethical Sourcing Group meet regularly and the Chief Financial Officer reports progress to the Group Managing Director, Dexion Asia Pacific.

The Ethical Sourcing Group includes senior representatives from each of the reporting subsidiary companies conducting business in Australia, who have direct knowledge of the operations and supply chains of these companies.

During the reporting period this statement covers every company conducting business in Australia which is owned or controlled by Tech-Link Storage Engineering (Australia) Pty Ltd. Each business was actively engaged in Dexion's ethical sourcing compliance activities and was regularly consulted as to progress.

Accordingly, in preparing this Statement, Dexion has been able to co-ordinate and confirm the actions and reporting of each entity in relation to ethical sourcing and the identification of any modern slavery risks in their supply chains.

Our Supply Chain

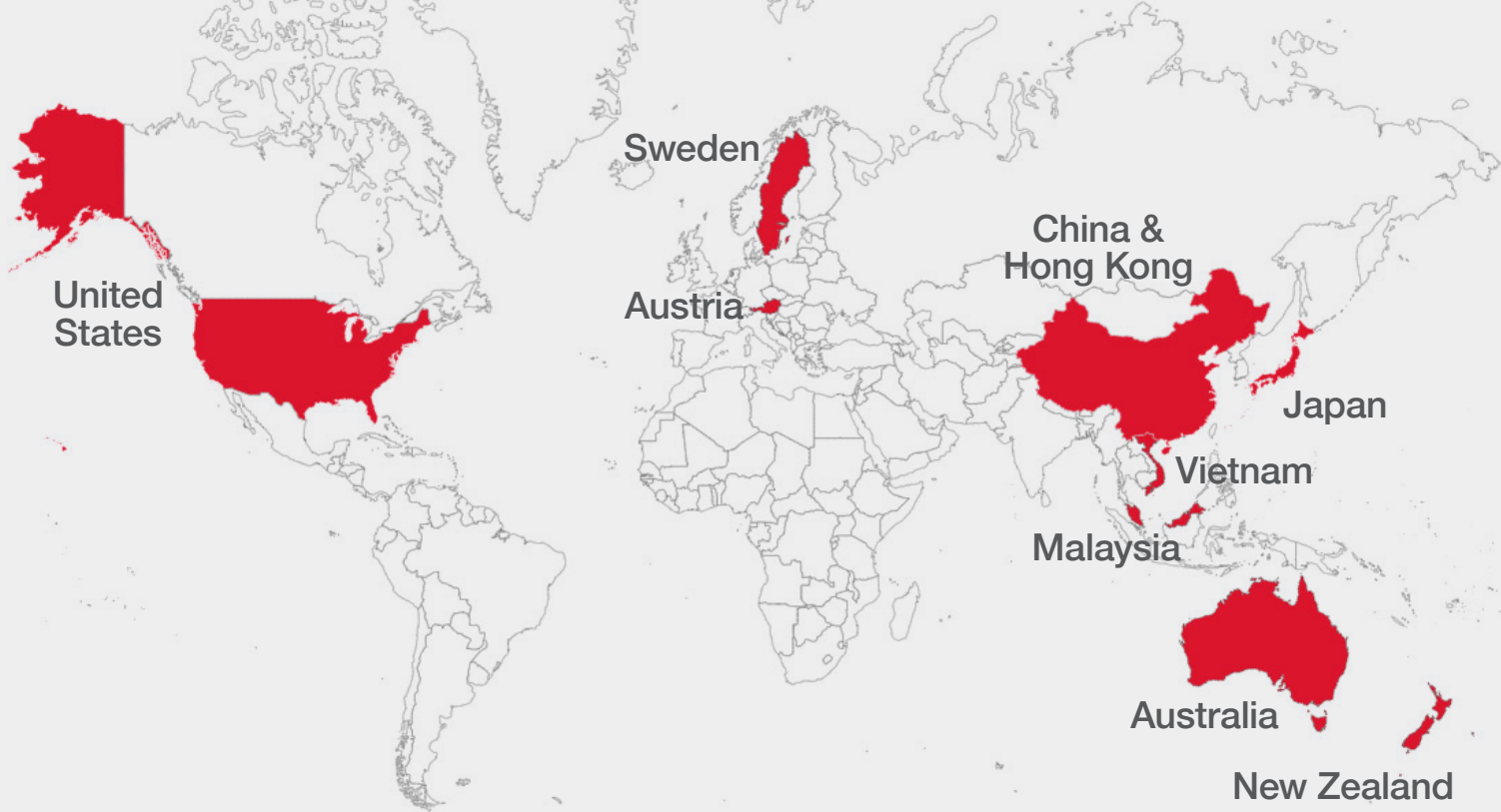
Dexion has longstanding relationships with its suppliers, and understands that strong commercial relationships create opportunities to influence supplier conduct on ethical sourcing issues. Each division of Dexion manages its own procurement needs, although there are synergies and shared suppliers across the group.

Industrial Supply Chain

- The Industrial division of Dexion boasts a well-established supply chain with a high level of consistency across annual spend year to year. The annual supplier spend demonstrates a strong bias toward owned or related company manufacturing facilities with the vast majority of manufactured product originating from only two facilities which are located in Malaysia and China. Due to this structure, we have a very high level of confidence and surety around our understanding of our supply chain.
- Importantly, Dexion has owned and managed factories in these regions for over 20 years, actively pursuing consistent improvement and adhering to best practice. Both the Chinese and Malaysian operations continue to benefit from a high level of ongoing investment in both manufacturing equipment and the facilities themselves. They source steel and small component parts from a variety of suppliers in China, Malaysia and Japan.
- The largest supplier of manufactured product is the Dexion owned facility located in Malaysia. Accounting for approximately 70% of our annual spend and accredited under ISO9001, this facility is also home to a number of Dexion's key strategic functions including Dexion's Procurement, Manufacturing Design and Engineering teams.
- The second largest supplier of manufactured product is a related company which manufactures in China. Representing approximately 15% of our annual spend, the high calibre of this facility is also evidenced by accreditation such as ISO9001 and ISO14001.
- The "tail" of the Industrial supply chain originates from primarily Australia and a related company in New Zealand. Given the non-related companies in this tail are all long standing partnerships and Australia based, we monitor and manage them with relative ease through regular interaction.

Commercial Supply Chain

- The Commercial division of Dexion employs a supply chain primarily within the southern hemisphere but also including the USA and Canada. In the majority, this supply chain consists of manufacturing facilities which are either a related company or who we have been working with for an extended period of time. These facilities set a high industry benchmark, boasting accreditation such as ISO9001 and ISO14001, in addition to meeting the stringent demands of globally recognized environmental certifications such as GECA and Greentag which include regular and in depth audits across a wide range of demanding criteria.
- The single largest supplier of manufactured products is a related company which manufactures in China and represents approximate 30% of our annual spend. The investment in this facility including state of the art manufacturing machinery places it among the most impressive Dexion has encountered anywhere in the world over its 80 plus year history.
- The partnerships with the two suppliers which represent a further 25% of our annual spend, boast a working history spanning an average of over 20 years. In addition to the independent third party audits conducted on Dexion's behalf by recognized bodies, we regularly visit these suppliers in their facilities to ensure we remain closely connected to their operations.
- The remaining "tail" of suppliers typically each represent 4% or less of our annual spend. We visit and meet with these suppliers at every opportunity so we can ensure we have an intimate understanding of our entire supply chain.



Systems Supply Chain

- Whilst the Systems division of Dexion is heavily biased toward tailored customer solutions which can result in notable year to year changes to our top suppliers by annual spend, there was a consistent trend among the top six suppliers for the 2020 period, which together account for in excess of 60% of that annual spend.
- Within these top six suppliers, four have their operation based in Australia and in aggregate they accounted for approximately 45% of the annual spend in the reporting period. Each of these partnerships span decades resulting in an intimate understanding of these local businesses.
- One of our top six suppliers is a related company which is based in China. Representing approximately 7% of annual spend, this facility is considered by Dexion to be one of the most impressive in our industry due to the investment in both the facility and state of the art machinery.
- The last of our top six suppliers is based in Austria. Whilst our partnership with this business spans fewer years than our top four, they boast state of the art operations and are recognized on the world stage as being one of the leaders in their field.
- The “tail” of suppliers represent an average of approximately 3% each of our annual spend. As a result of our regular collaboration while developing tailored customer solutions we have a very high level of familiarity with these suppliers and their full operation.

Supplier Relationships

From this foundation, Dexion is well placed to use direct influence to increase awareness about modern slavery risks in its supply chains.

Dexion Industrial

With over 85% of Dexion Industrial's spend on product components being sourced from Dexion-owned facilities and related entities, it has unparalleled insights as to the working conditions and treatment of those engaged to work at its primary suppliers. This includes wholly owned Dexion companies in Malaysia, China and New Zealand, as well as companies related to Tech-Link.

Dexion Commercial

Dexion Commercial works with trusted component suppliers and service providers (associated with distribution, installation and servicing) which are primarily located in Australia. Component suppliers are also located in the USA, China and Vietnam. Dexion Commercial's supplier relationships are very stable and it has a history of trading with these suppliers spanning up to 25 years. Dexion's primary key supplier in China, Sin-Sino Logistics Systems, is related to Tech-Link.

Dexion System Solutions

Dexion System Solutions secures services and sub-contracted labour from Australia, and its product components are also predominantly sourced from Australia. Components are also sourced from Austria, Sweden, USA, Canada, China and Japan from a select and limited group of suppliers – including related companies. Similar to Dexion Commercial, these relationships are long term and stable.

Dexion also has a long standing practice of requiring evidence of current certification to related ISO standards (such as ISO9001 and ISO14001). While these are for environmental and quality standards they do require the supplier to have established internal protocols to manage such issues, and as such they tend to sit at the top percentile in their industries.

Environmental Certification

Dexion prides itself in offering environmentally responsible and sustainable commercial storage solutions. An increasing number of its products (and supply chain) are certified by globally recognised bodies as meeting some of the most stringent environmental standards in the world. This includes but is not limited to complete factory and supply line audits by qualified independent auditors. This extends to secondary tier suppliers (tracking raw material to its source) and investigation of the supplier factories including obtaining staff payslips and random staff welfare interviews, with annual compliance updates for certification to remain valid.

Monitoring Supply Chain Risks

Dexion's initial engagement with suppliers in relation to compliance with the Code of Ethics was direct and facilitated by in person visits.

In pre-pandemic times Dexion maintained visits to factory premises of its suppliers on a regular basis. This provided Dexion with unique opportunities to observe, identify and assist suppliers in understanding and managing any modern slavery issues in their operations.

With the travel restraints created with the Covid-19 pandemic, Dexion decided to focus on a more formal approach of written assurance of compliance with its Code of Ethics and this assurance and compliance confirmation has been the primary objective for the 2021 Ethical Sourcing program.

Modern Slavery Risks & Remediation

Dexion's supply chain human rights risk assessment started with equating supplier location with inherent slavery practices risk, using resources such as the Global Slavery Index developed by the Minderoo Foundation's Walk Free initiative.

The Global Slavery Index uses prevalence estimation techniques, including nationally representative surveys, risk-model extrapolation and multiple systems estimation to measure modern slavery globally.

Suppliers to Dexion are primarily geographically located in low risk countries, including Australia, New Zealand, the USA, Austria, Sweden, Japan and China. In addition, Dexion requires various independent certifications of its foreign suppliers.

Where Dexion's suppliers are located in higher risk countries Dexion has the unique advantage of understanding and being able to directly control working conditions. For example, Dexion's Malaysian factory is the home of the Dexion Group Procurement, Manufacturing Design and Engineering.

Human rights issues prevalent in Malaysia include debt bondage and forced labour - especially amongst migrant workers. Accordingly, Dexion's Malaysian steel factory is meticulous in its hiring practices and a very high proportion of its staff come from local labour. This is a deliberate policy undertaken by Dexion to both support the local community and to actively mitigate against the risk of modern slavery which can arise with imported labour practices. Dexion is currently investing significant funds to build a new factory in Malaysia which is due to be completed in 2022.

Dexion is aware that placing expectations of performance on suppliers which include unreasonable time-frames or exceptionally low pricing is more likely to create pressure on its suppliers to engage in modern slavery practices.

Dexion remains closely involved with its suppliers to ensure that its demands are reasonable and commercial – without creating undue pressure on them to engage in modern slavery practices in order to meet demand.

Because Dexion has a manageable number of established long standing suppliers it has the opportunity to gain direct insights into modern slavery practice risks – which gives it an advantage over companies with large or variable numbers of suppliers.

Dexion is in the process of formalising its risk assessment and mitigation practices. Given the constraints of in person engagement at the factory level and for in-site visits due to the Covid-19 pandemic, Dexion has started the development of risk assessment tools to allow it to formally record and monitor:

- any modern slavery risks including risks caused, contributed to or directly linked to its operations:
- identify how these risks are addressed externally
- steps to integrate findings in the business and take action to address them

Dexion's 2021 Modern Slavery Statement will report more fully on these issues, including its progress with a direct engagement ethical sourcing program.

Ethical Sourcing Program 2021

- Update and review of Dexion's Code of Ethics
- Risk Assessment of Dexion service providers, product and component suppliers
- Implementation of the Dexion's Code of Ethics through direct assurance engagement across Dexion's tier 1 suppliers

Director signature

Approved and signed on behalf of the Board.



Damian Cross
Group Managing Director
Dexion Asia Pacific

Annexure 1: Modern Slavery Act 2018 (Cth) Mandatory Criteria Checklist

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of as defined by the Modern Slavery Act 2018 (Cth) (“the Act”)¹ on 30 June 2021.

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of as defined by the Act².

Mandatory criteria

The table below outlines where information related to each of the mandatory criteria in section 16 of the Act can be found:

Mandatory criteria	Page
a) Identify the reporting entity	3
b) Describe the reporting entity’s structure, operations and supply chains.	4-8, 11-12
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	11-13
d) 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.	9-14
e) Describe how the reporting entity assesses the effectiveness of these actions.	14
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	10
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant. ³	13

¹ Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

² Section 4 of the Act defines a responsible member as: (a) an individual member of the entity’s principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator;

³ You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.