



**RFI**  
TECHNOLOGY SOLUTIONS

# Modern Slavery Statement

## FY 2019/20

## Purpose

This statement, pursuant to the *Modern Slavery Act 2018* (Cth), sets out the actions taken by RFI Technology Solutions (RFI) to address modern slavery and human trafficking risks in our business and supply chain over the financial year ending June 2020.

## Our Approach

This is our first statement, and it has been developed in consultation with RFI's business units. It outlines our continued efforts to detect the risk of modern slavery across our business and supply chain and ensures that we have the most appropriate responses to that risk.

RFI values and promotes responsible corporate citizenship and shall work with our supply chain partners to always maintain the highest ethical standards throughout our business.

## About RFI

RFI is a family-owned Australian business founded in 1979 as a manufacturer of two-way radio antenna systems. With our origins in manufacturing over the past 40 years, our business has evolved into a leading global technology solutions company in Australia.

Our core business in the first decade was in the manufacture of mobile and base station antennas for the Australian two-way radio market. We opened a manufacturing facility in Victoria, Australia, and transformed this into a state-of-the-art facility which still operates today.

It was also in the first decade that we started selling solar panels – to power remote base station antenna sites all over rural and outback Australia. Power was an absolute necessity in outback Australia. We supplied and installed remote base station radio sites all over rural and outback Australia. This started our journey into the world of solar energy.

Today, our scope of operations includes the design and manufacture of radio communications products, project management, installation and commissioning of RF and Solar installations, warehousing and distribution. We consistently maintain our *AS/NZS ISO 9001*, *AS/NZS ISO 14001* and *AS/NZS ISO 45001* certifications.

RFI's headquarters is based in Sydney with approximately 250 employees across Australia.



## Our Values

RFI promotes the RFI Blue Values within the business.

### Blue Sky

#### **Open Our Minds to New Ideas**

At RFI we will look towards the future for new technologies and market trends. We look for innovative and creative solutions and listen openly to new ideas and opinions.

### Blue Ribbon

#### **Nail It in Service & Quality**

At RFI we put our customer first by listening and delivering to our customer's needs. We work to deliver the best quality product and service – always. We will thoroughly investigate and work together to resolve issues. We will work safely at all times.

### True Blue

#### **Integrity, Team Spirit & A Fair for All**

At RFI we give our colleagues a 'fair go' and treat each other with respect. We speak openly and honestly and call each other out on poor behaviours. We celebrate team successes. We work hard, play hard and have some fun.

## Our Process

During the reporting period for this statement, RFI commenced the planning and assessment phase of its modern slavery responsibilities which included the following:

- Introduction of our Social Accountability Policy;
- A review and update of our Ethical Standards and Social Responsibility Procedure;
- A review and update of our Whistleblower Policy;
- A review and update to our Supplier Code of Conduct; and
- The process and documentation for our Supplier Modern Slavery Self-Assessment Questionnaire.

RFI has developed training content specific to modern slavery practices and our policies and procedures to control the associated risks. This content is included in our initial employment inductions and during refresher training.

A more detailed course is being prepared for employees who require specific knowledge and capabilities to successfully implement and administer associated operational activities during the course of their employment.

## Our Policies and Governance

RFI possesses a robust governance framework that is underpinned by policies and procedures aimed at addressing modern slavery. This includes:

### **Risk Management Framework**

Our Risk Management Framework adopts a risk-based approach to our operations and supply chain, decision making and compliance obligations.

### **Code of Conduct**

Our Code of Conduct is outlined in the Employee Handbook provided at commencement of employment and available to all employees on our Intranet.

The Code of Conduct applies to all employees of RFI, including permanent full time, part time employees and casuals. The Code of Conduct provides a framework of principles for conducting business and dealing with customers, colleagues, and other stakeholders.

### **Social Accountability Policy**

Our Social Accountability Policy demonstrates our commitment to upholding the human rights of our own workforce and supply chain.

This policy is based on The Universal Declaration of Human Rights, The International Labour Organization's Declaration on Fundamental Principles and Rights at Work, The United Nations Convention against Corruption and Occupational Health and Safety Management Standard *AS/NZS ISO45001*.

### **Ethical Conduct and Social Responsibility Procedure**

This procedure details the processes required to report on and address the risks associated in RFI operations and supply chains in compliance with the *Modern Slavery Act 2018*. It also provides information and instruction on ethical behaviour.

### **Supplier Code of Conduct**

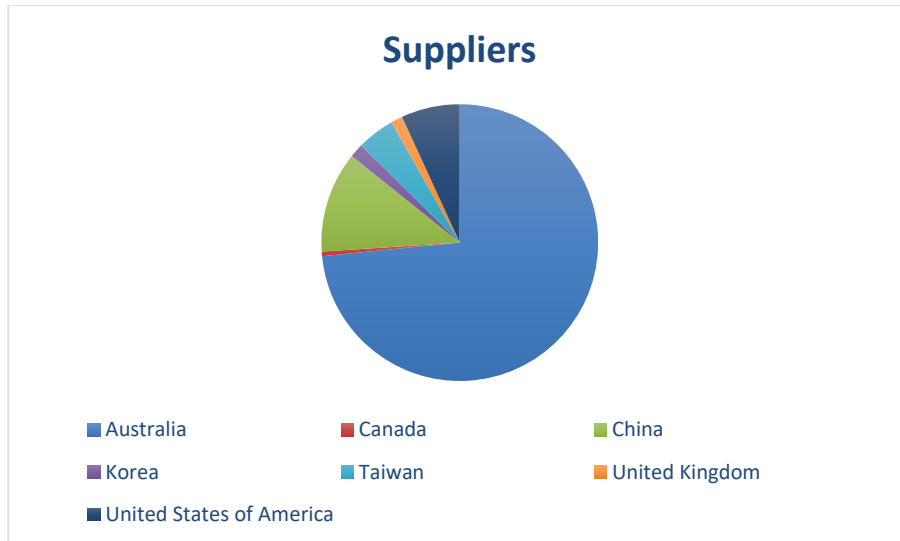
Our Supplier Code of Conduct outlines our expectation that our suppliers will act in a manner that is consistent with the principles for socially responsible, sustainable, and ethical business practices and that these principles are adopted throughout the supply chains.

### **Whistleblower Policy**

Our Whistleblower Policy demonstrates the importance RFI places on ensuring a safe and supportive environment, creating a culture within RFI that encourages our people to speak up and raise breaches of internal rules or policy, disclosable conduct relating to the company, its branches, officers, or employees.

## Supply Chain Overview

RFI manages approximately 375 suppliers around the globe. Our supply chains are diverse, with both domestic and international suppliers in the Asia-Pacific region, the UK and USA.



For the purpose of this statement, our key business supply chains provide materials and components for the following.

- Communications & Wireless – cables, connectors, cellular antenna, CB antenna, GPS antenna, GSM antenna, ISM antenna, marine antenna, UHF & VHF antennas, batteries, and chargers.
- Energy – DC/DC converters, energy storage, HV & LV battery inverter, industrial batteries, microinverters, small area modules, solar modules, solar mounting systems, solar regulators, string inverters and monitoring systems.

## Our Due Diligence

The steps we have taken to assess and mitigate modern slavery risks have focused on assessing and improving our supply chain assurance programme through the review and update of our Supplier Code of Conduct, provisions for the adherence with modern slavery laws and implementation of supplier risk assessment tools.

The Supplier Code of Conduct is communicated to suppliers as part of our tender process and is incorporated into our due diligence process. Activities undertaken as part of this process assists in identifying potential risk.

New and renewed supply agreements include modern slavery and Supplier Code clauses. This requires, amongst other things, that suppliers and their third-party suppliers, adhere to the principles in the Supplier Code, implement due diligence processes and take reasonable steps to minimise modern slavery risk in their operations or supply chain.

We will continue to explore opportunities to ensure we are identifying, assessing and mitigation the risk of modern slavery within our supply chains.

## Assessment of Modern Slavery Risks

The practices that comprise modern slavery include trafficking of persons, slavery, servitude, force marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour.

Our management of modern slavery risks in our operation and supply chains fall into our wider organisational risk management framework.

RFI uses a Modern Slavery Risk Factor Self-Assessment form which suppliers are requested to complete and submit on an annual basis to assist in its reporting requirements under the *Modern Slavery Act 2018*.

The completed forms are assessed to determine the risk rating for the individual supplier for the reporting year. All documents are securely maintained in the individual supplier profile within our ERP system.

During the FY2019-2020 reporting period, RFI has assessed that approx. 75% of its suppliers are based in Australia and due to established Australian labour regulations, minimum employment standards, and regulatory infrastructure to enforce associated statutory obligations, were deemed low risk.

## Measuring Effectiveness

Whilst there is extensive work being undertaken at a global level to understand and value respect for human rights, there are currently no fundamental units of measurement or international standards for measuring human rights impact. This is a complex issue that presents a challenge for all corporates in terms of providing credible measurements as to their effectiveness in addressing modern slavery risks.

On an annual basis reviews, the submitted Supplier Self-Assessment Questionnaires (SAQ) to determine the level of risk to our business. Results of the SAQ's are communicated to the RFI Operations team who will update the supplier status within our ERP system and address any concerns with those suppliers raised during the SAQ process.

## Grievances and Remediation Processes

We are committed to the protection and respect of human rights across our business and supply chain. Where we identify that RFI has caused or contributed to adverse impacts such as modern slavery, we will seek to address human rights grievances in line with the relevant policies, procedures, and legislative requirements.

Where risks are identified in our supply train, RFI's preferred approach is to work with supplier to develop a corrective action plan with agreed timeframes rather than terminating supplier arrangements.

## Other Relevant Information




During 2020, the COVID-19 situation around the globe provided some significant challenges for not only RFI but its suppliers as well. RFI strived to proactively manage the risks to our business and to those of our suppliers.

Travel and operational restrictions both locally and overseas enforced by State and Federal Governments, prevented RFI from undertaking the full supply chain assessment. Many suppliers closed for extended periods and with restrictions looking to ease in the early stages of 2021 and many of our suppliers resuming operational activities, RFI will proactively seek to continue the assessment of its supply chain.



## Approval

This Statement has been approved by the Board of RFI Holdings Limited.

 _____	Scott Magee CEO	<u>20 May 2021</u>
 _____	Steve Jaques Executive Director	<u>20 May 2021</u>
 _____	Duncan MacLean Director	<u>20 May 2021</u>
 _____	Lloyd Zenari Director/ Head of Services	<u>20 May 2021</u>
 _____	Bruce Crane Chairman/ Director	<u>20 May 2021</u>
 _____	Greg Young Independent Non-Executive Director	<u>20 May 2021</u>