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23 December 2024

Joint Modern Slavery Statement 2024

TE Connectivity Australia Pty Ltd ACN 000 129 573 and Grangehurst Enterprises Pty Ltd ACN 091 454 527

1. Preliminary Matters

- 1.1. This is the second annual Modern Slavery Statement for TE Connectivity Australia Pty Ltd (**TECA**) and Grangehurst Enterprises Pty Ltd (**Grangehurst**). For this Modern Slavery Statement, a reference to TECA is a reference to both TECA and Grangehurst. This joint Modern Slavery Statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (**the Act**) for the period 1 July 2023 to 30 September 2024 (FY24) (**Reporting Period**).
- 1.2. TECA has obtained the Attorney-General Department's approval for an amended Reporting Period comprising an extended period of 15 months for this report only. This has arisen as a result of TECA entities moving to a 30 September financial year in order to align with the offshore parent entity. Thereafter, TECA will adhere to a 12-month reporting period to 30 September in each year. The A-G's approval in writing is found at **Annexure A** of this report.
- 1.3. TECA is committed to promoting and supporting a culture of corporate compliance and ethical behaviour and endorses the implementation and promotion of ethical business practices to protect the human rights of workers in our value chain.

2. About the reporting entity

TECA is a distributor of electrical components, including cable accessories, connectors and fittings, insulation and protection, and metering and installation. Grangehurst currently holds a 100% shareholding in TECA. TECA is however the primary operating entity for Australia.

3. Structure, operations and supply chains of TECA

- 3.1. TECA is an indirect wholly owned subsidiary of its global parent company, TE Connectivity plc (**TE**). TE is a public company listed on the New York stock exchange and is a global designer and manufacturer of connectivity and sensor solutions serving customers and selling products in approximately 130 countries.
- 3.2. In the Reporting Period, TE operated in the following business segments:

- a. Transportation Solutions;

Legal Entity name,
a TE Connectivity Ltd. company.



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- b. Industrial Solutions; and
- c. Communications Solutions.

3.3. In June 2024, TE Connectivity joined the Responsible Business Alliance (RBA) as an Affiliate member to further promote responsible and sustainable business practices throughout our global supply chain.

3.4. In the Reporting Period, TECA's supply chain comprised approximately 309 and direct and indirect suppliers, including suppliers of componentry, raw materials, commodities, hardware, accessories, plastics and metal manufacturing, and other services required to support its operations.

3.5. In the Reporting Period, TECA employed around 79 employees, including contract employees, situated in the Australia and New Zealand (**ANZ**) region. All TECA employees are required to comply with the *TE Connectivity Guide to Ethical Conduct* (explained below at paragraph 5.10 of this statement) as a condition of their employment and must undergo annual on-line ethics training and certification.

3.6. In the Reporting Period, TECA engaged 18 new vendors as a combination of direct and indirect suppliers.

4. Risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.

Risk assessment

4.1. In association with our legal advisors, TECA has created a process for assessing the risk posed by its suppliers in relation to modern slavery practices in its operations and supply chains (**Risk Assessment**). In summary, this Risk Assessment process involves:

- a. generating an exhaustive list of TECA's suppliers;
- b. conducting an initial risk assessment of TECA's suppliers on factors including geographic location and operation, and the nature of the industry in which they provide goods and/or services (see paragraph 4.3); and
- c. screening TECA's suppliers through the World-Check record, which is a database run by Refinitiv (a subsidiary of Thomson Reuters) in its capacity as one of the world's largest providers of financial markets data and infrastructure (**Refinitiv Screening**).

We step through each process of the above Risk Assessment below.



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4.2. **Mapping TECA's supply chains.** In mapping TECA's supply chains, we compiled an exhaustive list of suppliers that service the ANZ region (totalling 309 direct and indirect suppliers in the Reporting Period). This process will be bolstered in subsequent reporting periods by the creation and distribution of a Modern Slavery Questionnaire which TECA intends to provide to its suppliers with a focus on its 'high risk' suppliers (see paragraph 5.15).

4.3. **Applying our risk assessment criteria.** We are committed to ensuring that our business considers the diverse factors which may inform risks of modern slavery practices and as such, TECA's risk assessment is informed by the following factors:

a. **Geography**, with respect to:

- i. the extent to which a supplier's geographic location has implemented, or is subject to, human rights legislation or international human rights regimes;
- ii. the strength of enforcement regimes with respect to any applicable human rights legislation or regimes in the supplier's jurisdiction;
- iii. whether the supplier's jurisdiction is subject to conflict, corruption, or known human rights violations; and
- iv. the degree of transparency in that jurisdiction for the achievement of human rights-based outcomes, including with respect to the supply products or process, including products used in hotel operations;

b. **market**, with respect to:

- i. the extent to which that industry is subject to regulatory oversight (including in relation to the sourcing of inputs, and applicable labour laws); and
- ii. whether that industry is known to be particularly prone to modern slavery practices;

c. **size**, this metric acknowledges that Modern Slavery risks may be more pronounced in smaller suppliers with less regulatory interaction.

4.4. TE also screens business partners, including suppliers, as part of the onboarding process to determine if they are listed on any sanction or restricted party lists. We take a proactive risk management approach with certain material suppliers by monitoring their business conditions and using technology to receive alerts of potential associations with high-risk suppliers in their supply chain.

4.5. **Refinitiv World-Check Screening.** During this Reporting Period, TECA further expanded the scope of its Risk Assessment to include screening suppliers through the World-Check record, which is a database run by Refinitiv (a subsidiary of Thomson Reuters) in its capacity as one of



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the world's largest providers of financial markets data and infrastructure (**Refinitiv Screening**). The Refinitiv database platform is a comprehensive risk intelligence tool used to screen and monitor entities for their risk profiles, amongst other things. We ran our list of external suppliers through the World-Check database.

- 4.6. The World-Check database contains millions of profiles of entities gathered from public sources and proprietary research that is continually updated for accuracy. Crucially, the database turns up details of any adverse media, criminal activities, or reports of Modern Slavery against each entity searched through the platform. In addition, the platform runs our supplier list against information from global sanctions lists, law enforcement agencies, and regulatory bodies, which assists TECA to identify suppliers that may be subject to sanctions or other legal restrictions.
- 4.7. TECA applied its Refinitiv Screening process to suppliers that were deemed most active in its supply chain. This was determined by focussing on the suppliers with which TECA spent over \$50,000 on average on an annual basis. 53 of its 309 suppliers in the Reporting Period were captured in this category and were subject to the Refinitiv Screening.
- 4.8. The Refinitiv Screening produced two key metrics to assist TECA's assessment of the Modern Slavery exposure posed by our supply chain, being the Modern Slavery Risk Matrix, and the World-Check Results the findings of which are detailed below:
 - a. **Modern Slavery Risk Matrix.** The Risk Matrix flagged:
 - i. 24 suppliers who were deemed 'high risk' based on either their geographic location, or their Industry (cleaning, manufacturing, farming, recruitment); and
 - ii. 7 suppliers who were deemed 'medium risk' on the same basis.
- 4.9. In this regard, the Refinitiv Screening results show that TECA has ongoing work to be done to reduce the risk of exposure to Modern Slavery in its supply chains. TECA intends to work with the suppliers identified in the Modern Slavery Risk Matrix and the World-Check Results over successive reporting periods, including by providing a copy of the Modern Slavery Questionnaire to them and other Medium and High Risk suppliers (once that document is finalised for distribution, see paragraph 5.15 in relation to the Modern Slavery Questionnaire) to better understand and address any modern slavery risks posed by their respective supply chains. This is an ongoing workstream for TECA.
5. **Actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.**

Modern Slavery Educational Bulletins (Employee-Facing)



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5.1. TECA recognises that an informed workforce will allow a consistent, transparent, and uniform approach to managing and reducing Modern Slavery risk. On this basis, in the Reporting Period, TECA drafted an internal educational modern slavery bulletin which it has circulated to all staff and affixed to the staff noticeboard at the business premises of ANZ staff (**Modern Slavery Bulletin**).

5.2. The Modern Slavery Bulletin:

- a. defines Modern Slavery and sets out TECA's responsibilities and obligations under the Act;
- b. informs employees about how to detect modern slavery practices, including risk factors and guidelines for identifying modern slavery risk;
- c. encourages employees to report any suspected or actual practices of modern slavery, including among other things, by directing suppliers to the grievance and reporting mechanisms set out in the Supplier Policy (explained below at paragraph 5.16 of this statement); and
- d. directs employees to additional resources.

Staff-facing Modern Slavery awareness materials

5.3. TECA makes use of Modern Slavery information resources published by the Australian Red Cross and has made it available in a prominent location on the kitchen noticeboard in business premises for ANZ.

Modern Slavery compliance meetings

5.4. Currently, TECA's modern slavery risk is assessed by its ANZ operations management personnel, and legal team, assisted by its legal advisors. Together, they conduct an annual review of modern slavery compliance within TECA (**Modern Slavery Compliance Committee**).

5.5. This team met twice in the Reporting Period (5 March 2024 and 14 August 2024) to assess the status of its various compliance activities and policies and consider what further actions could be implemented over future reporting periods.

5.6. It is intended that over successive reporting periods, TECA formally establish a Modern Slavery Compliance Committee to open channels of communication across our internal functions and assess the effectiveness of measures we have implemented.

TE Global Policies (pertaining to all TE entities)



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5.7. As TECA is an indirect wholly owned subsidiary of TE, it is subject to TE Global Policies which are explained in the following paragraphs. TE is TECA's largest supplier and TECA relies upon its parent company's application of Global Policies in relation to this aspect of its supply chain.

5.8. All TE entities are required to adhere to TE's policies, including the:

- a. *TE Connectivity Guide to Ethical Conduct;*
- b. *Human Trafficking and Modern Slavery Policy (TEC-01-71);* and
- c. *Global Human Rights Policy (TEC-04-37).*
- d. *Reporting and Investigating Misconduct (TEC-01-57)*
- e. *Global Workplace Respect and Civility Policy (TEC 04-34)*

(TE Global Policies).

5.9. By way of example, the **TE Global Human Trafficking and Modern Slavery Policy (TEC-01-71)** states:

'TE Connectivity Ltd. and its subsidiaries and affiliates, including related companies, partnerships, and joint ventures in which TE Connectivity Ltd. has a direct or indirect controlling interest, anywhere in the world (collectively, "TE" or "TE Connectivity" or the "Company") are committed to a work environment and supply chain that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor.'

5.10. The ***TE Connectivity Guide to Ethical Conduct (Ethical Conduct Guide)*** outlines TE's position on fair treatment and human rights for employees.

- a. Amongst other requirements, the Ethical Conduct Guide sets out TE's commitment to respect for Human Rights, Social Responsibility, and Global Corporate Citizenship. It prohibits all forms of forced, trafficked or child labour, and any activity that violates individual dignity, and prohibits any form of physical punishment, abuse and harassment.
- b. Every TE employee is required to participate annually in a training session on the Ethical Conduct Guide, commit to acting in accordance with the principles outlined in the Ethical Conduct Guide when carrying out work activities, and to report any activity that may be deemed a violation of the Ethical Conduct Guide.

5.11. Also, the ***TE Connectivity Human Trafficking and Modern Slavery Policy:***



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- a. prohibits human trafficking and sets out TE's commitment to a work environment and supply chain that is free from human trafficking and slavery, which expressly includes forced labour and unlawful child labour;
- b. prohibits numerous practices connected with human trafficking;
- c. stipulates that TE will develop and deploy appropriate training, including annual training to employees and third-party contractor personnel who have direct responsibility for the Company's operations and supply chain management. At the date of this report, this is still in progress;
- d. provides that any personnel who violate the policy may be subject to appropriate disciplinary and/or corrective action up to and including termination of employment or contract;
- e. stipulates that TE will communicate the principles and requirements set forth in the policy to suppliers, subcontractors and agents.

Due Diligence Activities

5.12. **Human Rights Officer.** As part of TE's *Declaration of Principles on Human Rights of the German Operating Legal Entities of the TE Connectivity Group in Germany* for compliance with the German Supply Chain Act, TE has appointed a Human Rights Officer whose responsibilities include, but are not limited to:

- a. risk assessment;
- b. prevention of violations;
- c. the oversight and implementation of grievance mechanisms;
- d. remediation measures; and
- e. review and improvement of our measures with respect to human rights obligations.

5.13. **Supply Chain Mapping.** As part of the updates to the *TE Connectivity Supplier Code of Conduct (TEC-1015)* (explained further below in paragraph 5.16), new supply chain mapping criteria was introduced. Due to increasing business continuity, sustainability and compliance requirements, TE requires its suppliers to conduct and support necessary supply chain mapping initiatives, including but not limited to efforts sufficient to meet 'clear and convincing' documentation standards that demonstrate 'Supply Chain Mapping Evidence' which comprises:

- a. the identity and location of suppliers' subcontractors and suppliers; and



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- b. the origin of its products and any component and raw materials in its products.

Supply Chain Mapping Evidence must meet applicable regulatory requirements, supply chain security programs, directives, or guidance from the applicable government authorities. TECA continues to work to comply with this. The Refinitiv Screening and upcoming Supplier Questionnaire document are examples of activities supporting TECA's efforts in mapping its supply chain.

Supplier focused compliance mechanisms

5.14. TECA seeks to engage primary suppliers whose values and supply chain practices align with TECA's commitment to complying with Modern Slavery obligations. TECA has several compliance mechanisms aimed to address supplier compliance, explained in the following paragraphs.

5.15. **Modern Slavery Questionnaire for Suppliers.** In the Reporting Period, and with the assistance of its external legal advisors, TECA has formulated a supplier-facing Modern Slavery Questionnaire designed to give TECA a comprehensive understanding of that supplier's own operations and supply chains, exposure to modern slavery risks, and general compliance with the Act (**Supplier Questionnaire**). The Supplier Questionnaire is intended to be sent to suppliers deemed to be 'high risk'. Relevantly, it expressly requires suppliers to confirm whether or not they have detected any instance of modern slavery practices in their own operations or supply chains. TECA intends to implement this practice in future reporting periods.

5.16. **TE Connectivity Supplier Code of Conduct (TEC-1015).** The *TE Connectivity Supplier Code of Conduct* (formerly titled the *TE Connectivity Guide to Supplier Social Responsibility*) (**Supplier Policy**) was revised in June 2024. This Supplier Policy aligns with the RBA Code of Conduct, and sets out in detail TECA's expectations for its suppliers with respect to business conduct, decision-making, and business interaction. It outlines key principles and behaviours, based on TE's Core Values (set out in the *Ethical Conduct Guide*), and emphasises the principles and behaviours required of suppliers. It addresses TE's labour and human rights expectations as follows:

- a. freely chosen employment;
- b. prohibitions on child labour;
- c. working hours;
- d. wages and benefits;
- e. humane treatment;
- f. non-discrimination;



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- g. freedom of association;
- h. responsible sourcing of minerals and materials ;
- i. environmental impact on local people'
- j. unlawful eviction of land; and
- k. prohibits violent security forces.

5.17. **Supplier approval and onboarding processes.** As part of TECA's process in determining whether to engage a new supplier, TECA maintains and follows an internal Supplier Onboarding Process. The Supplier Onboarding Process, among other things, involves following the guidelines set out in TE's internal **Supplier Approval Policy** which sets out that all TE suppliers agree to comply with the Supplier Policy (referred to above).

Grievance Mechanism

5.18. The Office of the Ombudsman acts as an independent, impartial and confidential resource with whom employees, suppliers, investors, customers, and other third parties can ask questions or raise concerns about potential violations of the *Ethical Conduct Guide*. The Ombudsman reports directly to the Audit Committee of the TE Board of Directors and ensures that all reported issues are investigated and resolved in an appropriate manner.

5.19. The program explicitly refers to the reporting of Human Rights law violations, as well as other areas of law. The Ombudsman and Chief Compliance Officer routinely meet with members of TE Senior management and the Audit Committee / Nominating, Governance and Compliance Committee of the TE Board of Directors.

5.20. The Office of the Ombudsman services all TE entities globally. Therefore, TECA employees are encouraged to use this service to report any actual or potential breaches of Modern Slavery obligations.

5.21. Information about the program is publicly available on the TE website at [Office of the Ombudsman | TE Connectivity](#).

TE Supplier Responsibility Program

5.22. TE has established practices to help monitor its suppliers, including Supplier Responsibility Program (SRP) Audits performed by a third-party auditing firm with auditors who are appropriately qualified with technical expertise in vendor assessment and the technical audit process.



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5.23. The SRP Audits validate suppliers' values and principles outlined in TE's Supplier Policy and identifies areas of concern related to forced labour/human trafficking, child/young labour, discrimination, compensation, working hours, environment, health & safety, freedom of association, ethics and subcontracting. TE's third party auditor conducts detailed on-site audits and follow-up audits as needed to monitor corrective action plans.

Human Trafficking and Slavery Survey

5.24. TE conducts an annual Human Trafficking and Slavery Survey (**HTS Survey**) of certain suppliers using the Slavery and Trafficking Risk Template (**STRT**), an industry standard survey used to collect human trafficking and slavery data from supply chains. The HTS Survey and supplier information gathering is facilitated by a third-party compliance information gathering service (**TPCS**) provided by a leading software-as-a-service solution accessed by TE's suppliers. Supplier response to the HTS Survey is voluntary.

- a. In December 2021, TE launched its first HTS Survey. TE surveyed approximately 1,000 high-risk suppliers for the first year. This first campaign resulted in 137 responses or a 14% response rate.
- b. In December 2022, TE launched a second annual STRT campaign and sent surveys to over 3,700 suppliers. This campaign ran through December 2023. TE received approximately 1061 responses, which is equivalent to a 28% response rate, which tripled the number of surveys sent to suppliers and doubled our response rate.
- c. TE continues to dedicate data analytic tools and resources to sub-tier due diligence efforts to refine the HTS Survey process. In 2024, TE formed a cross-functional team to analyze risk factors across TE's supply chain and spent a considerable amount of time conducting Request for Proposals (RFPs) for a risk analytics tool and a due diligence data collection tool and explored other human rights survey options for its next campaign.
- d. TE is continuing to enhance our survey process in working to align any remediation plans, determined after the surveys are reviewed, with our SRP audit process, including any corrective action plans, audits, trainings, or any other actions necessary to ensure supplier compliance.

Further compliance mechanisms currently under development at the date of this report

5.25. **Establishment of TE Human Rights Committee.** Over the current Reporting Period, TE and TECA established an enterprise-wide Human Rights Committee whose functions include, but are not limited to:

- a. screening and assessing areas of the business to identify gaps or risks to the business in relation to Human Rights obligations;



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- b. preparing action plans to address any risks or gaps identified in relation to the above;
- c. reviewing current company policies and suggesting and implementing any changes required as a result of those reviews;
- d. implementing additional due diligence processes; and
- e. generally evaluating salient Human Rights issues that may arise from time to time in relation to TE's value chains.

The committee has been assembled and includes representatives from several functions, including Human Resources; Government Affairs; Procurement; Supply Chain Compliance; Operations; Environmental, Health & Safety (EH&S) and Legal. The committee began meeting in January 2024 and has assessed the results of the Enterprise Human Rights Risk Assessment conducted in FY2023 via a third party service provider in order to strengthen our human rights program, due diligence and remediation processes.

5.26. **Whistleblower Policy.** TECA has implemented a whistleblower policy, in addition to TE's Ombudsman Programme. It provides a confidential and fair process for TE's Australian based workers to report conduct that may breach company policy or TE's obligations under relevant rules and laws, which includes Modern Slavery obligations.

6. How the reporting entity assesses the effectiveness of such actions.

- 6.1. TECA is currently designing and implementing a framework to ensure it can review the effectiveness of the controls it has implemented. As part of this framework, TECA has engaged external legal advisors with expertise in this area. Construction of this framework is an ongoing workstream for TECA.
- 6.2. TECA is committed to implementing appropriate processes for investigating, assessing, and handling modern slavery risks in its business and supply chains. Accordingly, TECA intends to demonstrate its commitment to continuous improvement over successive reporting periods by:
 - a. Further developing and enhancing existing procedures and mechanisms; and
 - b. Supplementing its cohesive response to modern slavery with additional policies, mechanisms and strategies, as it deems necessary.
- 6.3. Strategies that TECA is currently working on for implementation over successive reporting periods includes the following:
 - a. Implementing the practice of sending **Modern Slavery Questionnaires** to its suppliers, with a particular focus on ensuring that new suppliers return a completed copy of the questionnaire for review;



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- b. **Creation and implementation of a Remediation Guideline Document.** TECA is continuing its efforts to develop a structured approach to remediation by the drafting of a remediation guideline document. This document will set out defined procedures in the event that a Modern Slavery event is detected or eventuates, and will prescribe guiding principles to be considered in any approach to remediation. This is an ongoing workstream for TECA;
- c. Continuing to enforce and promote awareness of the TE Connectivity Guide to Ethical Conduct and Global Human Rights Policy.

7. Describe the process of consultation with any entities that the reporting entity owns or controls.

7.1. TECA does not currently own or control any entities for the purposes of section 16 of the Act and interacts only with suppliers not owned nor controlled by TE.

8. Conclusion

8.1. TECA is demonstrably committed to ensuring that it complied with its Modern Slavery obligations. As described above, TECA takes active steps to review and improve its Modern Slavery processes on an ongoing basis.

8.2. This statement was approved by the Board of Directors of TECA and Grangehurst. The Boards of each reporting entity have the same board members and have each approved Adam Samuel Duncan as the responsible member to sign this statement.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Adam Samuel Duncan', written over a light blue horizontal line.

Adam Samuel Duncan

Director, Grangehurst Enterprises Pty Ltd

A handwritten signature in black ink, appearing to read 'Adam Samuel Duncan', written over a light blue horizontal line.

Adam Samuel Duncan

Director, TE Connectivity Australia Pty Ltd