

Modern Slavery Statement

2023/24

Schweigen Pty Ltd

ABN 53 124 141 322

1. STRUCTURE

Schweigen Pty Ltd (Schweigen) is a 100% Australian owned and operated Australian Private Company. It has two offices in Australia - the headquarters and factory in Melbourne, an office and showroom in Perth, and a showroom in Brisbane.

Founded in 2007 by Thomas Mullan (Co-Owner) in Melbourne, Schweigen originally operated for third parties as a wholesaler and distributor for quality home appliances sourced overseas.

Identifying a gap in the local market, it started engineering Australia’s first Silent Rangehood system and marketed it along with other appliances and specialty accessories in the Australian market under the Schweigen brand.

Today, this award-winning line of Silent Rangehoods, together with onboard variants, silent exhaust fans, specialty ducting and filters are available from more than 900 stores nationwide and in New Zealand.

Along the way, Schweigen has partnered leading local players across industries to deliver world-class products and customer service – supporting local people and jobs in manufacturing, logistics, professional trades and retail.

2. PRODUCTS

The bulk of manufacturing is done in Germany, Spain, Italy and Turkey with R&D, assembly, packaging, marketing, distribution, service and support done locally in Australia.

Schweigen products include:

Rangehoods	Silent Rangehoods, Onboard Rangehoods and its spare parts.
Exhaust Fans	Silent Exhaust Fans and its spare parts.
Ducting	Specialty high-performance safety ducting for domestic, commercial and industrial applications.
Filters	Specialty antimicrobial-treated filters and baffles.
Vents	BAL-rated vents and rangehood installation kits.

3. CODE OF ETHICS

- Schweigen supports employee, social and economic development, including internationally recognized protection of human rights, non-discrimination, protection of children, prohibition of forced labor, protection of trade union rights, health and safety in the workplace, working hours and remuneration.
- Schweigen promotes a strong learning culture among its employees and provides them with ample opportunity for training and upgrading.
- Schweigen commits to creating a safe and peaceful work environment where everyone can work in compliance with the law.
- Schweigen guarantees confidentiality of information to employees and partners.
- Schweigen ensures that its employees and partners act and are likewise treated with dignity and respect within the framework of legal protections.
- Schweigen undertakes to comply with regulations on occupational safety and to promote such safety in all places that are part of the workplace.
- Schweigen does not tolerate any form of exploitation, harassment or discrimination by any employee or partner against another employee or partner. Sexual harassment of any kind will be severely punished, including by termination of employment and/or partnership.
- Schweigen prohibits any disciplinary action against employees and partners who legitimately refuse to perform activities unduly requested by any person linked to Schweigen, that would be unlawful, illegal or contrary to the principles set out in this Code of Ethics.
- Schweigen is opposed to discrimination or favoritism based on age, gender, race, nationality, language, color, ethnicity, faith, political affiliation, sexual orientation, marital status, disability, appearance and social-economic conditions.
- Schweigen is against the illegal employment, forced labor, child labor and any other conduct that constitutes an offense against the person. Every working relationship is established with a contract where all employees or partners are informed of their rights, duties and obligations.
- Schweigen assumes responsibility towards the community, customers, partners and employees.
- Schweigen maintains and develops a trustworthy relationship with all stakeholders, with open channels of communicating all issues that affect them.

4. RISKS OF MODERN SLAVERY PRACTICES

While we are not directly involved in the majority of the manufacturing process, Schweigen is significantly concerned about:

- A lack of transparency in supply chains that makes it difficult to trace the origin of raw materials and components used in its products. This creates opportunities for unscrupulous actors to exploit vulnerable workers through forced labor and human trafficking.
- Subcontracting and informal labor practices that makes it challenging to monitor labor conditions and ensuring compliance with labor standards.
- Inadequate monitoring leading to a lack of oversight, enabling modern slavery practices to persist undetected.
- Limited enforcement of labor laws and weak penalties for non-compliance contributing to the perpetuation of these practices.
- Unethical recruitment practices and debt bondage that make it nearly impossible for workers to escape exploitative conditions, especially in labour-intensive operations.

5. RISK MITIGATION

Schweigen's Code of Ethics defines how it conducts its business in an ethical manner to:

- Offer products and service that deliver the highest standards of safety, performance and innovation; and
- Safeguard the health, dignity and safety of workers making the above possible.

Adopting this Code of Ethics helps Schweigen:

- Establish a code of behaviour that prevents crimes related to Schweigen's business activities;
- Identify measures to monitor compliance with the Code; and
- Create stakeholder value based on trust and open communication.

Schweigen is constantly improving its business processes to better deliver on these commitments.

During this reporting period, we analysed our supply chains and operations to identify modern slavery related risks and established a risk register of the key risk areas identified.

During the assessment process, we also identified the areas with the lowest risk, specifically local operations handled by staff directly employed by us.

Currently, our highest risk area is offshore manufacturing and logistics organized by third party contractors in Europe and East Asia.

6. ASSURANCE PROGRAM

Schweigen undertakes quality control of its products sold in Australia and New Zealand. This includes defining and applying procedures that ensure products which do not comply with Schweigen's strict quality standards do not get sold.

Schweigen commits to selecting and retaining suppliers based on quality, convenience, price, ability, professionalism, efficiency, reliability; and avoiding agreements with suppliers of questionable reputation in environment-related issues, working conditions and/or human rights issues.

Schweigen collaborates with its suppliers to deliver sustainable solutions and promote responsible behaviour that protect the wellbeing of workers and the communities in which it operates.

Schweigen expects its suppliers and partners to adopt legal and ethical behaviors in line with internationally accepted standards and principles concerning the treatment of its employees and workers, particularly the protection of basic rights, non-discrimination, protection of children, prohibition of forced labor, protection of trade union rights, occupational health and safety, working hours and remuneration.

Schweigen acknowledges that open communication with the suppliers is a critical component in developing an appropriate plan to avoid a modern slavery situation.

In order to prepare this statement, Schweigen engaged with our supply chains and logistic partners to seek alignment and agreement on the above.

7. COMMITMENT

As Schweigen evolves its business over time, it commits to reviewing the effectiveness of its Modern Slavery Risk Management program by assessing its governance and risk assessment. Schweigen also commits to responding promptly to grievances and reporting the same to the Board of Directors.

Schweigen has a Whistleblower Policy in place that ensures an anonymous process for employees, customers and partners to report their concerns related to the direct activities, and/or Schweigen's supply chains. Our whistleblowing procedure continues to be designed to make it easy for employees to make disclosures without fear of retaliation.

To promote transparency and mitigate the Modern Slavery risk for Schweigen suppliers outside its direct control, Schweigen commits to regularly review and rationalize its product range and supply chain. Measures to be implemented include:

- Increasing engagement to include any reputable supplier;
- Confirming a governance committee for oversight and escalation of modern slavery issues;
- Working with key industry partners and exploring mechanisms to better measure the effectiveness of actions we undertake to address modern slavery and human trafficking risks;
- Sharing details relating to non-conformances and other findings through the risk assessment and due diligence processes;
- Subjecting all new and renewing suppliers to a due diligence process comprising first, a brief questionnaire. This helps Schweigen to identify areas of non-compliance with the Code of Ethics or potential areas of risk, and where identified, the supplier will be referred for further audits;
- Training of all employees that have interactions with high-risk groups on Modern Slavery Act requirements; and
- Inclusion of the above into annual reports.

8. ENDORSEMENT

This statement is made in accordance with Part 1 section 6 of the Modern Slavery Act 2018 and constitutes Schweigen's Modern Slavery Statement for the financial year commencing 1st July 2023 and ending 30th June 2024.

This statement was approved by the Board of Directors of Schweigen Pty Ltd.

Thomas Mullan

Thomas Mullan
Managing Director