



**TRIVANTAGE**

Trivantage Group

**Modern  
Slavery  
Joint  
Statement  
2020**

## **Trivantage Group opposes all forms of slavery and forced labour in its operations and the operations of its suppliers.**

This Modern Slavery Statement is made on behalf of Trivantage Group pursuant to the *Modern Slavery Act 2018* (Cth). This Statement sets out the proposed actions by Trivantage to assess and address modern slavery risks across the operation and business procurement.

### **Our Business, Structure & Operations**

Formed through the merger of S.J. Electric and SEME Solutions in November 2008, Trivantage Group has had a long and successful history in the electrical industry in Australia. Trivantage Group is one of Australia's leading providers of national electrical low voltage solutions and comprises of three integrated divisions.

**Trivantage Manufacturing** – Switchboard Manufacturing

**S.J. Electric** – Commercial Electrical Services

**SEME Solutions** – Building Security

Trivantage Group has been delivering the highest standard switchboard manufacturing, electrical installations and maintenance and building security and healthcare technologies to Australian businesses for over 50 years. Today, the Trivantage Group is at the leading edge of many aspects of electrical service solutions, switchboard manufacturing, data communications, nurse call and security (CCTV and access control) technology.

Trivantage has locations across Australia and the bulk of our workforce is made up of qualified electricians, professional engineers and specialist technicians.

### **Policy framework**

Trivantage is a reporting entity as defined under the Commonwealth's *Modern Slavery Act 2018*, so is required to submit its first modern slavery statement by March 2021, and annually thereafter.

Trivantage is pleased to publish its inaugural Modern Slavery Statement in response to the requirements of the Act. The information presented in this statement covers the proposals to be undertaken by Trivantage in the FY19/20 reporting period.

In preparation, a working group will be established during the current reporting cycle with cross functional representation to provide an effective modern slavery framework, that meets legislative requirements and supports the promotion of human rights in its business and supply chain.

Trivantage proposes:

- (a) To undertake a focused review on what Trivantage terms as 'Tier One' suppliers. These are suppliers who provide most of the materials and highly specialised equipment to be incorporated into Trivantage's products and services.
- (b) To publish our Modern Slavery Policy on our internal and external website.
- (c) To conduct an internal review of Trivantage for compliance.
- (d) To introduce controls to assess and manage modern slavery risks.
- (e) To work with our labour service providers to identify compliance.
- (f) To rollout communications and education to Trivantage management and staff.
- (g) It will take a risk-based approach that its procurement practices support its approach to minimising the risk of modern slavery within the operation and business procurement.

Trivantage will continue to refine the criteria for assessment as its knowledge of suppliers and the risks in these areas develops.

Trivantage recognises the importance of protecting human rights and is committed to protecting the rights of all people including its employees, the communities in which the Company operates, those who may be impacted by its activities, its customers, and those within its supply chains.

Modern slavery has the potential to exist in the supply chain through a variety of circumstances including:

- Forced labour
- Child labour
- Debt bondage
- Human trafficking
- Abuse of requirements for a minimum living wage
- Discriminatory employment practices

Trivantage management of modern slavery risks falls within its overall approach to protecting human rights. The foundation documents for human rights protection are contained within company Policies.

These documents outline Trivantage's approach to establishing the essential standards of personal and corporate conduct and the behaviour expected of everyone who works for or with Trivantage including directors, employees and suppliers.

Trivantage will seek to establish procedures that require suppliers to complete a risk and compliance checklist as an additional commitment to work with Trivantage. This will be an important tool in raising awareness, understanding and where required their obligations.

## **Governance**

Good corporate governance is critical to the long term, sustainable success of Trivantage. It contributes to value creation and positive outcomes for all stakeholders. Good governance is

embedded throughout Trivantage and is the collective responsibility of the Board and all levels of management.

Trivantage seeks to adopt leading governance standards and apply these in a manner consistent with its culture and values.

Trivantage's organisation and supply chain is assessed within Trivantage's risk management framework. One key focus of senior management will be to work collaboratively with Trivantage's suppliers, that expectations and standards are understood.

### **Trivantage's suppliers**

Trivantage aims to build supportive, transparent and collaborative relationships with suppliers and strategic partners. We will expect our suppliers and strategic partners take appropriate steps that their organisation does not engage in, or inadvertently condone, modern slavery, including that their employees and contractors work in decent and safe conditions, and that no human trafficking, forced labour, child labour or other forms of modern slavery is employed in the delivery of products or services to Trivantage. We encourage our suppliers and strategic partners to manage their business and supply chain in a manner that upholds human rights and rejects modern slavery.

Over 99% of Trivantage's total procurement spend occurs within Australia. To manage the risk of modern slavery in our supply chain we will implement the following steps:

- communicate to 'Tier One' suppliers and encourage them to manage their business and supply chain in a manner that rejects modern slavery,
- where we appoint new suppliers, we will introduce new supplier checklists, in order to gain a proper understanding of the measures they have in place that modern slavery is not occurring within their own businesses; and
- Trivantage will implement a process to capture and review data.

### **Due Diligence & Remediation**

Due diligence is implemented to prevent and mitigate adverse impacts and the Company provides access to remedy through effective grievance mechanisms.

The due diligence process will be initiated by an assessment of any new supplier prior to engagement.

Trivantage has mechanisms for employees to anonymously report suspected or actual illegal activity or breaches of Company Policy, including the Company's Code of Conduct. Each employee can access the whistle-blower process through our online portal TriHub. Each whistle-blower disclosure received is investigated and reported to the executive. The instances and outcomes of the whistle-blower investigations are reported to the Board.

Trivantage's approach to remediation is to address each issue as it arises, on a case-by-case basis in a systematic, fair, timely and transparent manner.

There have been no reports of modern slavery or human trafficking through our whistle blower arrangements as of the date of this Statement.

## Looking Forward & Continuous Improvement

Assessing our practices and procedures against the requirements of the *Modern Slavery Act 2018* (Cth).

Our aim is to create an enhanced understanding of modern slavery risks within our business operations and supply chains.

Trivantage's Anti-Slavery Working Group will introduce the following priorities throughout the initial cycle:

### Policy review

Review the current policy framework to identify, assess and address modern slavery risks across the operation.

### Training

Deliver targeted modern slavery education to all procurement staff.

### Engagement and Collaboration

Engage and encourage with suppliers to manage their business and supply chain in an ethically, environmentally and socially responsible manner.

### Assurance

Trivantage recognises that tackling modern slavery requires a continuing commitment. Trivantage will continue to collaborate with internal and external stakeholders to address modern slavery risks, as well as strengthening the group's ability that modern slavery risks are notified and acted upon.

This Modern Slavery Statement was approved by the Directors of Trivantage Group.

Signed for and on behalf of the Directors of Trivantage Group



Russell Stanley  
CEO



Ben Weston  
CFO/Director