

This Modern Slavery Statement (**Statement**) has been prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). This Statement sets out the actions taken by Asplundh Holdings Pty Ltd (**Asplundh Australia**) and its related entities to address modern slavery risks and ensure responsible and transparent practices within its business and supply chains.

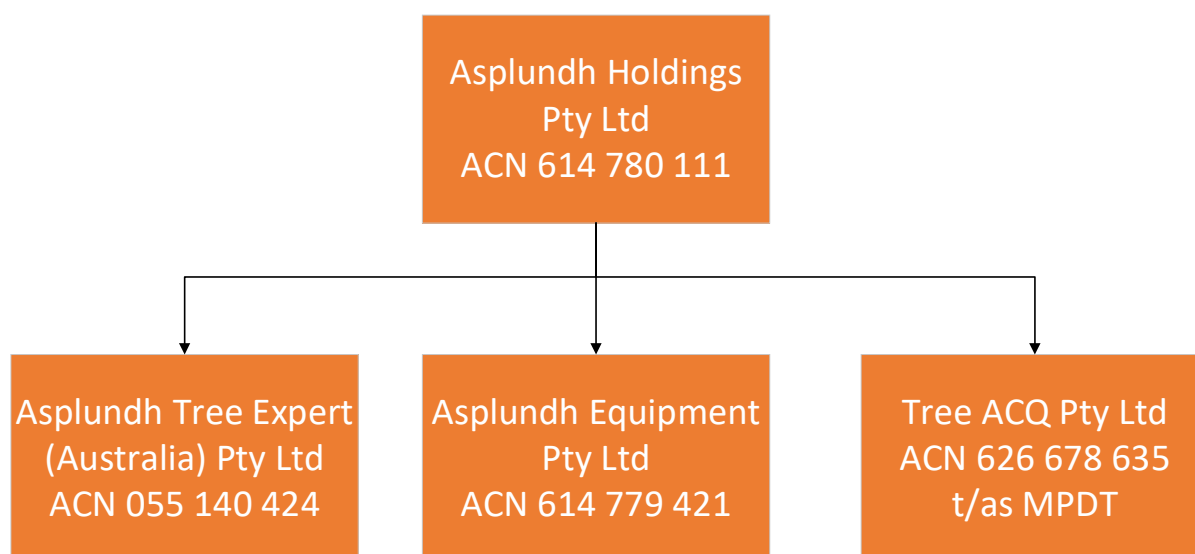
## Our Structure, Operations and Supply Chains

Asplundh Australia is a wholly owned subsidiary of Asplundh Tree Experts LLC. Asplundh Australia commenced operations in 1992.

Asplundh Australia's head office is located in Glendenning, New South Wales, Australia.

### Structure

## Australian Company Structure



### Operations

Asplundh Australia has over 1000 workers, including employees and sub-contractors as a part of its operations. Asplundh Australia services a diverse client base including Local Government Authorities, Rail and Road Authorities, Power Distribution corporations and commercial land clearing operations.

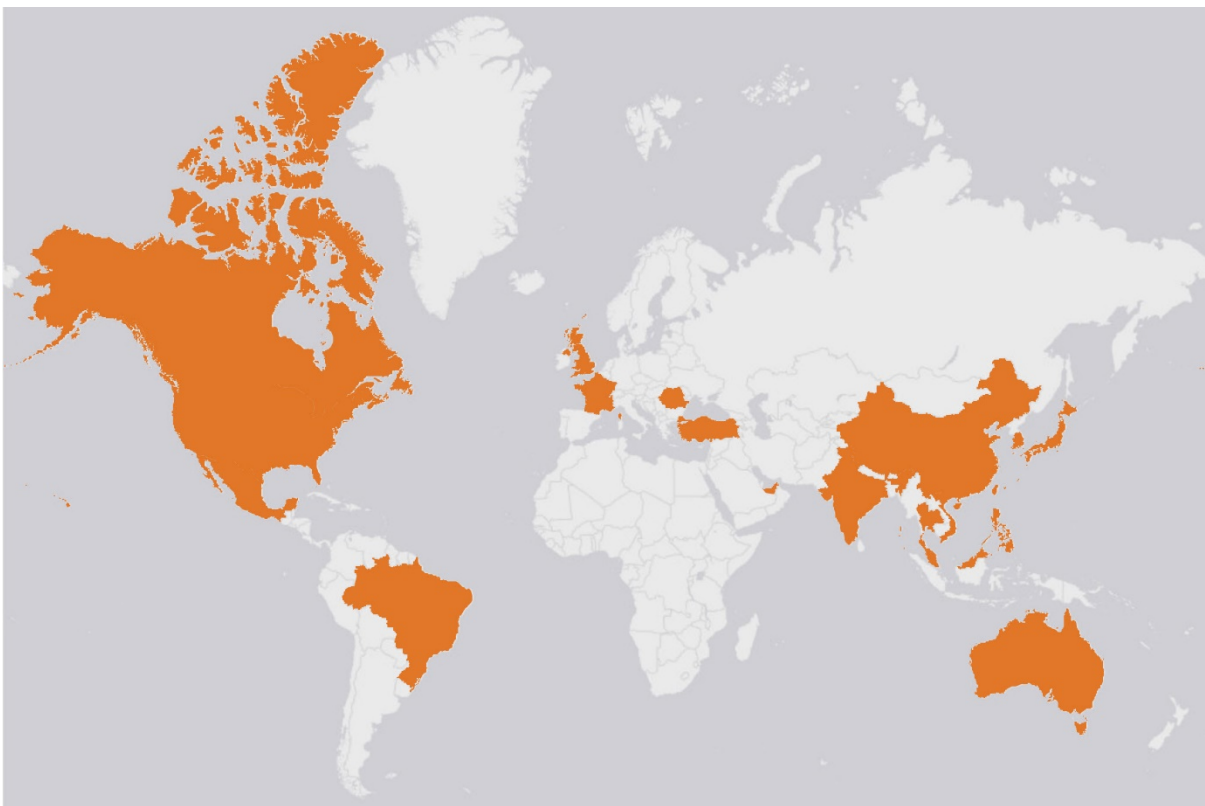
Asplundh Australia's operations are predominantly based in New South Wales, Queensland and Victoria in Australia.

## Supply Chains

Asplundh Australia's supply chains include:

- contractors in the maintenance, construction, transport and logistics, and cleaning industries;
- manufacturers of vehicles and vehicle components;
- producers of extractives, mining and bascal metal;
- manufacturers of uniforms, safety equipment and food;
- business-related and professional service providers;
- producers of electronics;
- contractors associated with outsourcing IT work;
- manufacturers of furniture, hardware and fittings;

Asplundh Australia relies on global suppliers from countries including:



## Identification of Modern Slavery Risks

In November 2020, Asplundh Australia commissioned Edge Environment to undertake an assessment of the modern slavery risks that exist within its supply chains and operations (**Risk Assessment**). In conducting the Risk Assessment, Edge Environment relied on Asplundh Australia's procurement data.

### Level of risk

The Risk Assessment identified 56 procurement categories utilised by Asplundh Australia to conduct its business during the period December 2019 to November 2020.

The Risk Assessment revealed that:

- 10 procurement categories carried a "very high" level of modern slavery risk domestically. This risk was primarily driven by the use of low-skilled workers, sub-contracting services and labour hire arrangements.
- 14 procurement categories carried a "very high" level of modern slavery risk within their respective supply chains. This risk was primarily driven by the use of global suppliers.
- 13 procurement categories carried a "high" level of modern slavery risk within their respective supply chains. This risk was primarily driven by the potential use of low-skilled labour in those categories.
- 16 procurement categories carried a "medium" level of modern slavery risk within their supply chains. This risk was primarily driven by the potential use of sub-contractors and short-term labour hire arrangements in those categories.
- 13 procurement categories carried a "low" level of modern slavery risk. This risk was primarily driven by the use of global suppliers in those categories, including suppliers from countries with poor human rights track records, and the use of base-skilled workers in low-skilled industries.

### Cause of risk

Asplundh Australia acknowledges that the use of:

- *Low-skilled labourers* are more likely to be irregular or migrant workers. This category of worker is particularly vulnerable to exploitation and abuse in the workplace, including by way of exposure to slavery-like practices.
- *Sub-contractor and labour hire arrangements* expose workers to an increased risk of exposure to unfair working conditions. This is likely caused by a lack of regulation and oversight in relation to the labour hire industry.
- *Global/overseas supply chains* carry an increased risk of exposure to modern slavery practices because of an increased reliance on countries with poor human rights track records.

## Stage of supply and level of risk

The **below** table sets out the key types of modern slavery risks identified in Asplundh Australia's supply chains and the stage at which those risks were most likely to be present.

| Type of modern slavery risk  | Stage at which identified risk most likely to be present   |
|--|--|
| <ul style="list-style-type: none"> <li>● Health and safety</li> <li>● Child labour</li> <li>● Forced labour</li> <li>● Debt bondage</li> <li>● Migrant labour</li> <li>● Excessive work hours</li> <li>● Poverty wage</li> <li>● Freedom of association</li> </ul> | <ul style="list-style-type: none"> <li>● Raw material extraction</li> <li>● Mining</li> <li>● Processing</li> <li>● Manufacturing</li> <li>● Transportation of goods</li> <li>● Onsite low-skilled labour</li> </ul> |

## Products/services and type of risk

The **below** table provides a summary of Asplundh Australia's supply chains, the common activities, materials or products within those supply chains, and the particular modern slavery risks associated with the reliance on those materials, products or activities.

| Risk proximity  | Asplundh's Products / Services   | Key modern slavery issues  |
|---|--|--|
| Direct Risk<br><br>(Risks identified in onshore and on-site activities) | <ul style="list-style-type: none"> <li>- Sub-contract services</li> <li>- Repair and maintenance</li> <li>- Construction</li> <li>- Transport and logistics</li> <li>- Cleaning</li> </ul> | <u>Labour rights</u><br>This issue presents a particular risk for workers in: <ul style="list-style-type: none"> <li>- repair and maintenance</li> <li>- construction</li> <li>- transport and logistics</li> <li>- cleaning</li> <li>- Use of sub-contractors and labour hire arrangements</li> </ul> |
|   | <ul style="list-style-type: none"> <li>- Business-related service</li> <li>- Professional services</li> </ul>  | <u>Labour rights</u><br>This issue presents a particular risk for workers in: <ul style="list-style-type: none"> <li>- business-related services; and</li> <li>- professional services (e.g. ICT, legal, financial, administrative, educational, and hospitality service)</li> </ul>                   |
| Supply Chain Risk   | <ul style="list-style-type: none"> <li>- Parts and equipment</li> <li>- Motor vehicles</li> </ul>  | <u>Labour rights, and Health and safety rights</u><br>These issues present a particular risk in overseas supply chains of: <ul style="list-style-type: none"> <li>- parts</li> <li>- equipment (for tractors, lifts, chippers,</li> </ul>  |

|  |             |   |
|--|-------------|---|
|  |             | <p>chainsaws etc.)</p> <ul style="list-style-type: none"> <li>- motor vehicles</li> <li>- vehicle parts</li> <li>- other manufactured goods (incl. production of metal products)</li> <li>- health and safety</li> </ul>  |
|  | Materials   | <p><u>Labour rights, Health and safety rights, and Human rights</u></p> <p>These issues present a particular risk in overseas supply chains of:</p> <ul style="list-style-type: none"> <li>- fuels</li> <li>- uniforms</li> <li>- food</li> <li>- building materials (incl. plastic, glass, cement, gypsum, hardware, metals, tiles, textiles, brick, stones and sand.</li> </ul> |
|  | Electronics | <p><u>Labour rights, and Health and safety rights</u></p> <p>These issues present a particular risk in electronics supply chains.</p>   |

## Actions to Address Modern Slavery Risks

### Due Diligence

The Risk Assessment has provided Asplundh Australia with invaluable insight into its exposure to modern slavery, the level of risk in relation to the same, and the steps required to mitigate that risk.

In response to the Risk Assessment, Asplundh Australia is working towards implementing the recommendations from the Risk Assessment, including:

- Ensuring contracts with key suppliers include provisions which require those suppliers to conduct their operations in a way which minimises the Modern Slavery risks in their relevant supply chain;
- Understanding where Modern Slavery risks exist in Asplundh Australia's supply chains, and the nature of such risks;
- Surveying and grading key suppliers in relation to the Modern Slavery risks they present, including (but not limited to) during the supplier onboarding process;
- Adopting a policy on Human Rights which sets out Asplundh Australia's position on Modern Slavery;
- Developing and delivering suitable information for its staff and suppliers in relation to Modern Slavery; and
- Reviewing Asplundh Australia's policies in relation to Procurement, Grievance and incorporating clear remediation steps

## Other steps

Asplundh Australia has a demonstrated and progressive commitment to the improvement of the rights and wellbeing of people across its operations and supply chains. This commitment is facilitated by Asplundh Australia's:

- Internal policies;
- Commitment to education and training;
- Obtaining legal and professional advice relating to managing the risks identified in the Risk Assessment;
- Formation of a Modern Slavery Committee with appropriate reporting to the Directors and key stakeholders; and
- Auditing of supply chain risks.

## *Policy development*

Asplundh Australia has a comprehensive framework of policies and procedures designed to incorporate Asplundh Australia's values and culture.

Asplundh Australia has implemented the following policies and procedures:

- Whistleblower Policy;
- Subcontractor Management Procedure;
- Grievance Investigation Policy;
- Equal Employment Opportunity Policy;
- Safety Policy; and
- Performance and Conduct Management Policy

These policies are generally reviewed by Asplundh Australia on an annual basis.

## Education and Training

Asplundh Australia is committed to providing education and training opportunities to its workforce in relation to modern slavery. Through the provision of education and training programs, Asplundh Australia's workforce are better equipped to monitor, identify and address any modern slavery practices they identify.

Asplundh has provided training and written documentation to its workforce regarding:

- Purchasing of products and services;
- Employment processes;
- Indigenous participation plans; and
- Continuing improvement processes.

Asplundh Australia will be ensuring all employees are trained in Modern Slavery through external providers by December 2021. Specifically, Asplundh Australia will endeavour to engage all relevant employees and subcontractors to complete online learning through Tap Into Safety. The Understanding Modern Slavery Course through Tap Into Safety uses mixed media to highlight the risks of Modern Slavery. Upon completion of the Course, a certificate will be issued and maintained in their employee training records.

## **Future Actions to Address Modern Slavery Risks**

For FY 2021/2022, Asplundh Australia has committed to undertake the following actions to address the risks of modern slavery in its business and supply chains:

- Implement a process for onboarding and vetting suppliers and sub-contractors across Asplundh Australia, including (but not limited to):
  - Ensuring long term suppliers meet or exceed Australia's modern slavery standards;
  - Encouraging short term and one-off suppliers to complete a credit account application;
  - Ensuring long term sub-contractors demonstrate appropriate safety, environmental and quality management systems.
- Update subcontractors' agreements and procurement policies to include modern slavery;
- Create an internal due diligence procedure for high-risk suppliers;
- Develop a formal process that provides clear steps for modern slavery remediation;
- Expand the grievance procedure to include modern slavery;
- Utilize the existing training tools that Asplundh Australia has at its disposal to train employees, sub-contractors and suppliers in modern slavery issues;
- Prioritise categories for modern slavery mitigation using knowledge of Asplundh's suppliers, contractors, and supply chain; and
- Prepare and implement a Human Rights Policy to cover all human rights related policies within Asplundh Australia.

## Effectiveness of Asplundh Australia's Actions

In FY 2019/20 Asplundh Australia received 0 reported instances of modern slavery breaches in its business or supply chains.


## Consultation Process

Consultative meetings have been held with the Asplundh Australia Leadership team which incorporates all General Managers, Human Resources, Safety, Fleet and the Information Technology Department to discuss Asplundh Australia's responsibilities under Modern Slavery. Throughout this process it was determined that Asplundh Australia would engage Edge Environment to complete a Risk Assessment and Gap Analysis of Asplundh Australia. A Modern Slavery Working Group was formed which included key stakeholders across all Asplundh Australia entities.

Each stakeholder consulted with Edge Environment through a series of meetings and document sharing exercises to enable Edge Environment to assess and analysis Asplundh Australia's supply chains.

Upon completion of the Risk Assessment and Gap Analysis a risk prioritisation evaluation was conducted with the Edge Environment to formalise the Asplundh Australia Action Plan. The Modern Slavery Working Group will implement the Action Plan by February 2022 and consult on a quarterly basis with stakeholders.

This statement was approved by the Board of Asplundh Australia on 10<sup>th</sup> June for the year ended 2021.



---

Gregory Fitzgerald  
Managing Director  
Dated: 10<sup>th</sup> June 2021



---

Lee Butler  
Company Secretary  
Dated: 10th June 2021