

# Modern Slavery Statement - 2022

## 1. About this Statement

SEW-Eurodrive Pty. Ltd. ACN 006 076 053 (**SEW-Eurodrive**) is pleased to provide its first modern slavery statement (**Statement**) under the *Commonwealth Modern Slavery Act 2018* (Cth) (**Act**).

SEW-Eurodrive is part of the global group (**Group**) which is ultimately owned by SEW-Eurodrive GmbH & Co. KG (**SEW KG**), headquartered in Bruchsal, Germany.<sup>1</sup> SEW KG is expected to report under the German Supply Chain Due Diligence Act.

In this Statement, the use of the words “we”, “us” and “our” refers to SEW-Eurodrive.

This Statement covers the actions we have taken to identify, assess and manage modern slavery risks in our operations and supply chain during the financial year commencing on 1 January 2022 to 31 December 2022 (**reporting period**). It is our first reporting year under the Act, and many actions we undertook occurred towards the end of the reporting period when it became evident that we may have to report under the Act. Due to this, many actions began in the reporting period but were completed or remain ongoing outside of the reporting period.

## 2. About SEW-Eurodrive

The history of the Group first begins on 13 June 1931 when banker Christian Pähr founded Süddeutsche Elektromotorenwerke, SEW, in Bruchsal, North Baden.<sup>2</sup> The Group has grown exponentially since then, presently employing over 19,000 staff and operating in 52 countries.<sup>3</sup>

Our operations in Australia began when SEW-Eurodrive was registered as an Australian company in Victoria on 11 August 1982.<sup>4</sup> SEW-Eurodrive operates in Melbourne, Queensland, New South Wales, South Australia and Western Australia. As at December 2022, SEW-Eurodrive employed 283 people across Australia.<sup>5</sup>

SEW-Eurodrive does not own or control any other entities.

### 2.1 Operations

SEW-Eurodrive is primarily engaged in the assembly, sales, distribution, and post-sales support of gear motors and drive solutions in Australia.<sup>6</sup> As part of this, SEW-Eurodrive purchases semi-finalised goods and is responsible for order processing, warehousing, inventory management, and sales and marketing activities.<sup>7</sup>

SEW-Eurodrive is headquartered in Melbourne and is supported by a network of offices in New South Wales, Queensland, South Australia and Western Australia. SEW-

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<sup>1</sup> Source: section 1.2.1 of the Transfer Pricing Document dated 7 July 2022 (**Transfer Pricing Document**); Source: ASIC Historical Search.

<sup>2</sup> Source: [https://www.sew-eurodrive.com.au/company/our\\_drive/history/history.html](https://www.sew-eurodrive.com.au/company/our_drive/history/history.html)

<sup>3</sup> Source: section 1.2.1 of the Transfer Pricing Document.

<sup>4</sup> Source: ASIC Historical Search.

<sup>5</sup> Source: section 1.2.2 of the Transfer Pricing Document.

<sup>6</sup> Source: section 1.2.2 of the Transfer Pricing Document.

<sup>7</sup> Source: section 1.2.5 of the Transfer Pricing Document.

Eurodrive owns a total of 12 properties and leases 2 properties. These properties include offices, servicing facilities and a heavy industrial solutions service centre.<sup>8</sup>

## 2.2 Supply chain

We received approximately over 80% of our supplies from our parent company, SEW KG. More than 84% of our supplies come from the combination of SEW KG and our sister companies located in China, America and Finland.

The remainder of our materials are purchased locally in Australia, including gaskets and seals. The material categories of our suppliers are:

- Consumables such as bearings, oils, nuts and bolts, paints;
- Packaging including cardboard and wood (pallets);
- Freight forwarders;
- Temporary labour hire;
- Metals fabrications;
- Mechanical products repair services;
- General assets including office equipment, plant equipment, furniture, computers; and
- Equipment maintenance including A/C, test and tag, calibrations, office equipment.

SEW-Eurodrive has approximately 1,300 local suppliers which includes government agencies.

## 3. Introduction to Modern Slavery

The Act defines Modern Slavery to include trafficking in persons, slavery servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.<sup>9</sup> Modern slavery is often linked to other crimes and activities that adversely impact human rights, for example corruption or environmental damage.<sup>10</sup>

The 2021 Global Estimates of Modern Slavery indicate there are 49.6 million people living in situations of modern slavery on any given day.<sup>11</sup> Forced labour accounts for 27.6 million of modern slavery victims.<sup>12</sup> These numbers have increased since the 2017 Global Estimates of Modern Slavery partly due to multiple crises including the COVID-19 pandemic, armed conflicts and climate change.<sup>13</sup>

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<sup>8</sup> [https://www.sew-eurodrive.com.au/company/our\\_drive/on\\_site\\_at\\_sew-eurodrive\\_australia/on\\_site\\_at\\_sew-eurodrive\\_australia.html#Locations](https://www.sew-eurodrive.com.au/company/our_drive/on_site_at_sew-eurodrive_australia/on_site_at_sew-eurodrive_australia.html#Locations)

<sup>9</sup> page 8 of the Commonwealth Modern Slavery Act 2018 - Guidance for reporting entities.

<sup>10</sup> page 9 of the Commonwealth Modern Slavery Act 2018 - Guidance for reporting entities.

<sup>11</sup> Source: <https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/#:~:text=Forced%20labour%20accounts%20for%2027.6,150%20people%20in%20the%20world>

<sup>12</sup> Ibid.

<sup>13</sup> Ibid.

All companies, no matter their incorporation jurisdiction, operate in this global context and must act in order to reduce the risk of modern slavery in their supply chains. We are committed to upholding the Convention concerning Minimum Age for Admission to Employment (Convention 138 of the International Labour Organization (**ILO**)) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Convention 182, ILO).<sup>14</sup>

SEW-Eurodrive refuses the use of forced labour, slavery and child labour and we aim to ensure that our processes reflect this.<sup>15</sup> SEW-Eurodrive has adopted a Code of Conduct on Human Rights that sets out the company's stance on human rights (**SEW Human Rights Code**). The SEW Human Rights Code covers forced labour, slavery, child labour, unlawful discrimination, support for training and personal development of employees, health and safety regulations, confidentiality and security of personal information (including health information), bribery and corruption and environmental impact

SEW KG has a code of conduct (**Code of Conduct**), which applies to SEW KG's branches, business units and affiliated companies in Germany and is binding on every individual within SEW-Eurodrive across the globe (in accordance with the applicable local legislation).<sup>16</sup> On this basis, SEW-Eurodrive adheres to and supports the Code of Conduct. The core principles of the Code of Conduct are:

Principle	Description
Abiding by the law	Strict compliance with the applicable laws in each country and relevant provisions such as government directors. The Group is committed to the 10 core principles of the Global Initiative of the United Nations ( <b>UN</b> ).
Management culture	Management acts as role models and base their behaviour on the Code of Conduct, including reporting any violations of the Code.
Human rights / ban on child labour and forced labour	The Group respects and complies with internationally recognized human rights at all times, observing the respective national regulations and the regulations of the UN on children's rights and the ban on forced labour.
Employee rights	Respect for national statutory requirements on labour rights. The Group complies with the fundamental employee protection rights, whose principles are expressed in the international conventions of the UN and in the standards of the ILO, among other things.
Health and safety	The Group ensures compliance with occupational health and safety at the workplace in accordance with the applicable national provisions. The Group considers that we are all responsible for preventing hazards for people and the environment.
Cooperation and the ban on discrimination	We treat each other with humanity and respect at all times. We want our dealings with each other to be unprejudiced and open, and we are committed to opposing any form of

<sup>14</sup> Source: Germany Code of Conduct page 12.

<sup>15</sup> Source: sections 2-4 of the SEW Eurodrive Code of Conduct on Human Rights.

<sup>16</sup> page 9 of the Code of Conduct.

	discrimination in line with the applicable law. The Group particularly rejects discrimination against people on the basis of their gender, race, any disability, ethnic or cultural origin, religion or world view, age, or sexual orientation.
Environmental protection	Sustainability is a major part of the Group's philosophy. The Group is committed to the goal of sustainable environmental protection, which is just as important an objective as achieving the highest quality work products and efficient health and safety work policies.  For this reason, we base our actions on ISO standards 14001 (environmental protection) and 50001 (energy management).
Tax compliance	Fulfilling tax obligations is an important element of social responsibility.  We promote ethical and transparent business conduct. We pay all taxes and levies as well as submitting tax declarations in compliance with the respective applicable local legislation and other regulations in the countries in which the Group operates.

#### 4. Addressing risks of modern slavery practices in our operations and supply chain

As this is SEW-Eurodrive's first reporting year, we focused our attention on identifying key modern slavery risks and assessing the status and effectiveness of our current actions and frameworks.

It is important to note that as SEW-Eurodrive is part of a global group it is possible that modern slavery risks may arise in countries where we operate and source our supplies due to issues present in those nations. As a result, our modern slavery risk profile continually evolves and changes over time.

In order to assess the key risks of modern slavery practices in our operations and supply chain, we have engaged Informed 365 to conduct a data analytics assessment of the inherent risks in our supply chain. When it became apparent that we would be required to report under the Act we engaged Informed 365. Due to the timing of the engagement, the data we obtained was assessed after the reporting period. However, it is noted that the data we obtained did include supplier data from the reporting period and that we took active steps to engage Informed 365 so as to capture data for the reporting period.

When we measured our suppliers by value, SEW-Eurodrive's largest expenditure (being 63% of our total supplier expenditure when considering all forms of supplies including the acquisition of assets) was found to be with companies that were within the Group. In our first reporting period we focused on assessing our Tier 1 suppliers with whom we had the largest spend in order to build a better understanding of our potential exposure to modern slavery.

The UN's Guiding Principles on Business and Human Rights (**UN Guiding Principles**) sets out the following ways to identify human rights impacts:

- » a company may cause the impact through its own activities;

- » a company may contribute to the impact through its own activities (either directly or through some outside entity); or
- » the company may neither cause or contribute to the impact, but be involved because the impact is caused by an entity with which it has a business relationship and is linked to the company's own operations, products or services.<sup>17</sup>

Based on our strong governance policies and our visibility of our supply chain in Australia we consider the risk slim to none that SEW-Eurodrive causes or contributes to modern slavery practices in our own operations.

The area that may be of higher concern to SEW-Eurodrive is that we may be indirectly linked to modern slavery practices through the supplies of goods and services we obtain from our Tier 1 and deeper supply chain. We recognise that we could in particular contribute to this risk if SEW-Eurodrive were to engage in irresponsible business practices for example, by placing unreasonable time or cost restraints on our suppliers.

#### 4.1 Geographical risk

Our largest supplier SEW-KG is based in Germany and received a low score of vulnerability to modern slavery (noting that in this scoring system the lower the ranking score the better).<sup>18</sup> SEW-KG operates in a country that was ranked 158 out of 160 for estimated prevalence of modern slavery by country (noting that in this scoring system the higher the ranking number the better).<sup>19</sup> This places our largest supplier SEW-KG as ranked in the bottom 2% of countries with estimated prevalence of modern slavery.

Geographic location is a factor commonly used to identify a supplier who may be at risk of modern slavery. Some countries may have higher risks of modern slavery due to:

- (a) poor governance;
- (b) weak rule of law;
- (c) conflict;
- (d) corruption;
- (e) migration flows; and
- (f) socio-economic factors (such as poverty).<sup>20</sup>

SEW-KG procures from the following countries:<sup>21</sup>

Argentina	Australia	Austria	Belgium
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<sup>17</sup> Page 15 of The Corporate Responsibility To Respect Human Rights: An Interpretive Guide by the United Nations Human Rights Office of the High Commissioner.

<sup>18</sup> Pages 2 and 32 of the [Global Slavery Index 2023](#).

<sup>19</sup> Page ii of the [Global Slavery Index 2023](#).

<sup>20</sup> Addressing Modern Slavery in Government Supply Chains – A toolkit of resources for Government procurement officers, pg 7, available at < <https://modernslaveryregister.gov.au/resources/>>.

<sup>21</sup> [https://www.sew-eurodrive.de/company/procurement/procurement.html#image\\_map\\_filter](https://www.sew-eurodrive.de/company/procurement/procurement.html#image_map_filter)

Bulgaria	Canada	China	Croatia
Cyprus	Czech Republic	Denmark	Finland
France	Germany	Hong Kong	India
Ireland	Israel	Italy	Hungary
Japan	Liechtenstein	Malaysia	Netherlands
New Zealand	Poland	Portugal	Romania
Singapore	Slovenia	Spain	South Korea
Sweden	Switzerland	Taiwan	Thailand
Turkey	USA	United Kingdom	

We note that out of the countries identified above, only Turkey was included in the top 10 countries with the highest prevalence of modern slavery from the Global Slavery Index 2023.<sup>22</sup> However, we also note that countries with the largest estimate of absolute numbers of people in modern slavery (noting the large populous in these regions) include China and India.<sup>23</sup>

We also acknowledge the widely reported modern slavery risk associated with products sourced from the Xinjiang Autonomous Region of China. SEW-Eurodrive (the reporting entity that operates in Australia) does not have any tier 1 suppliers located in this region.

Of the countries identified above to be of highest-risk, these countries represent 0% of SEW-Eurodrive's total spend in 2022.

## 4.2 Industry risk

Certain industries may have higher modern slavery risks due to their products and processes.<sup>24</sup> We recognise that industries which are unregulated are generally considered to be of higher risk of modern slavery.

Of the industries that are commonly identified as being at a high risk to modern slavery,<sup>25</sup> textiles and fashion (in regards to uniforms), electronics and cleaning services were identified as relevant to SEW-Eurodrive.

Manufacturing and logistics that are produced within Australia carry a lower risk, due to the comparatively low prevalence of modern slavery in Australia.<sup>26</sup>

<sup>22</sup> Page ii of the [Global Slavery Index 2023](#).

<sup>23</sup> Pages 203 - 205 of the [Global Slavery Index 2023](#).

<sup>24</sup> Addressing Modern Slavery in Government Supply Chains – A toolkit of resources for Government procurement officers, pg 7, available at < <https://modernslaveryregister.gov.au/resources/>>.

<sup>25</sup> Including extractives, textiles and fashion, fishing, electronics, cleaning, and agriculture. See page 44 of the [Guidance for Reporting Entities](#).

<sup>26</sup> Pages 203 - 205 of the [Global Slavery Index 2023](#).

However, manufacturing globally accounts for nearly one-fifth of all forced labour exploitation of adults, 18.7% or around 3.2 million people.<sup>27</sup> Manufacturing involves transforming raw materials as well as the transformation of other manufacturing products into new products. Most forced labour cases occur in the production in the lower tiers of domestic or global supply chains.<sup>28</sup> SEW-Eurodrive acknowledges this risk and aims to mitigate through the actions detailed throughout this modern slavery statement.

### 4.3 Product and services risk

The most salient areas of product and services risk for SEW-Eurodrive that we self-identified in our modern slavery training in accordance with the UN Guiding Principles were:

Area	Commentary
Electronics and technology	<p>We source electrical devices including computers and mobile phones for our office staff.</p> <p>The electronic industry is a globally recognised as being high-risk.<sup>29</sup> The components that are used in each device may involve rare metals or raw materials that can be linked to modern slavery practices and the manufacturing of the products may occur with negligible oversight. This is compounded by the fact that investment in the production of electronics has increased and developing countries are increasingly manufacturing more electronic products with ever increasing cost and time pressures being applied to suppliers.</p>
Cleaning and security services	<p>We use cleaning and security services at our Australian offices. We also utilise such services for our equipment calibration, testing and tagging of electronic equipment, air-conditioning maintenance, and plumbing and electrical repairs.</p> <p>Cleaning and security services are recognised as high risk industries. These industries often use foreign workers, temporary workers or unskilled labour to carry out work that is not always visible, for example the work is conducted at night time or in remote locations. It is also</p>

<sup>27</sup> Pages 30-31 of the [Global Estimates of Modern Slavery September 2022](#).

<sup>28</sup> Page 30 of the [Global Estimates of Modern Slavery September 2022](#).

<sup>29</sup> Page 147 of the [Global Slavery Index 2023](#).



	<p>common practice to have sub-contracting arrangements within these industries, leading to a lack of visibility down the supply chain. Foreign workers face barriers of reporting modern slavery including language, level of education and visa insecurity.</p>
Agricultural products	<p>The agricultural industry is a recognised industry at a high-risk for modern slavery and 13% of all adult forced labour exploitation occurs in agriculture.<sup>30</sup> The industry utilises labour hire contractors (who recruit seasonal workers for picking produce on farms) and often exposes workers to poor working conditions including the use of bonded labour and implements the practice of passport retention.<sup>31</sup> In some instances, workers have had their wages stolen from them.<sup>32</sup> Agricultural products do not feature prominently in our immediate nor even in our deeper supply chain and other than the provision of staff amenities (i.e. coffee, tea, sugar etc.) we do not have agricultural products in our manufacturing processes.</p>
Coffee	<p>We supply coffee in our Australian offices.</p> <p>The production and harvesting of coffee beans has often been linked to practices of modern slavery.<sup>33</sup></p>
Stationary, uniforms and office furniture	<p>Fashion and textiles is recognised as a high risk industry globally.</p> <p>Particularly, in 2022 there were reports of systemic repression against Uyghurs and other Turkic Muslims in the Xinjiang Uyghur Autonomous Region of China, including widespread use of forced labour in cotton and garment production (in addition to several other high-risk sectors).<sup>34</sup> As identified above, SEW-Eurodrive (the reporting entity that operates in Australia) does not have any tier 1 suppliers located in this region.</p>

<sup>30</sup> Page 31 of the [Global Estimates of Modern Slavery September 2022](#).

<sup>31</sup> <https://www.abc.net.au/news/2015-05-04/supermarkets-food-outlets-exploit-black-market-migrant-workers/6441496>

<sup>32</sup> <https://greens.org.au/magazine/dangers-farm-work-australia>

<sup>33</sup> Page 147 of the [Global Slavery Index 2023](#).

<sup>34</sup> Page 12 of [Broken Promises Report 2022](#).

SEW-KG procures the following products or materials:<sup>35</sup>

Purchased motors	Rotary encoders	Cables	Couplings
Fans	Printed circuit boards (PCBs)	Plastic parts	Extruded parts
Active components	Passive components	Lubricants	Deutsches Institut für Normung (known as DIN or German Industry Standards) parts and standard parts
Copper	Castings	Bronze	Steel
Magnets	Laminated cores	Machined parts	Sealing technology
Packaging material	Rolling bearings	Forged parts	

## 5. Actions taken to assess and address the risks of modern slavery (including due diligence and remediation processes)

### 5.1 Supplier Due Diligence

#### (a) SEW-Eurodrive

SEW-Eurodrive has engaged Informed 365 in order to facilitate a supply chain assessment for modern slavery risks. Specifically, SEW-Eurodrive has joined an industry specific consortium to utilise the suppliers and experts already participating in that consortium. Informed 365 provides self-assessment questionnaires, developed by leading human rights experts, for suppliers to provide responses. Suppliers are automatically scored on their responses. We are finalising our data analytics arrangements with Informed 365 under which data is to be collected for deeper analysis. We intend to inform suppliers who are assessed to be at a higher risk of modern slavery that their business practices include risks of modern slavery and to engage further with targeted action to resolve issues if issues are identified.

Informed 365 also apply a filter to suppliers through the "Integrated high-level Informed 365 Index". This filter is generated from a weighted combination of country and industry risks. This assists us to identify risks of modern slavery practices.

SEW-Eurodrive intends to continuously monitor its supplier's ratings and responses and address any areas of concern as they arise. It is hoped that Informed 365's assessment will lead to a greater alignment between a supplier and our way of working as well as provide an assessment of their ethical practices.

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<sup>35</sup> [https://www.sew-eurodrive.de/company/procurement/procurement/procurement.html#image\\_map\\_filter](https://www.sew-eurodrive.de/company/procurement/procurement/procurement.html#image_map_filter)

## (b) The Group

Our parent company utilises a system called Procurement 360° which is an integrated, process-focused approach to the Group's procurement system.<sup>36</sup> Procurement 360° reflects the philosophy of the holistic approach, according to which our procurement department thinks and operates successfully on an international basis.<sup>37</sup>

The system has 8 process fields as follows:



Procurement is incorporated into the entire value creation chain at SEW-Eurodrive.<sup>38</sup>

The entire supplier pool is monitored via the "Critical Supplier Watchlist". SEW-KG also observes procurement markets, political events and technology trends to enable proactive and efficient initiatives to be implemented.

## 5.2 Accountability, Governance and Policies

Governance is a key mechanism for our modern slavery response. Our Human Rights Policy and the other policies detailed below further demonstrate and support our commitment to respecting human rights. Respect for human rights is a responsibility that is shared by all at SEW-Eurodrive.

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<sup>36</sup> [https://www.sew-eurodrive.de/company/procurement/procurement/procurement.html#image\\_map\\_filter](https://www.sew-eurodrive.de/company/procurement/procurement/procurement.html#image_map_filter)

<sup>37</sup> [https://www.sew-eurodrive.de/company/procurement/procurement/procurement.html#image\\_map\\_filter](https://www.sew-eurodrive.de/company/procurement/procurement/procurement.html#image_map_filter)

<sup>38</sup> [https://www.sew-eurodrive.de/company/procurement/procurement/procurement.html#image\\_map\\_filter](https://www.sew-eurodrive.de/company/procurement/procurement/procurement.html#image_map_filter)

SEW-Eurodrive's Board is ultimately responsible for approving our modern slavery statement and the implementation of our modern slavery response. The Company Secretary is responsible for modern slavery risk management at SEW-Eurodrive.

Our policies and governance mechanisms are comprehensive and represent the culture that we aim to uphold at SEW-Eurodrive. Our policies and governance aim to ensure the health and safety of our employees.

**(a) Whistleblower policy**

We have a whistleblower policy (**Whistleblower Policy**) that can be utilised by any "Eligible Whistleblower". Our Whistleblower Policy includes anyone who is or has been:

- an employee or officer (whether full time, part time or casual) of SEW-Eurodrive;
- a **supplier of goods or services to SEW-Eurodrive, or an employee (whether paid or unpaid) of such a person;**
- an associate of SEW-Eurodrive, such as a person with whom SEW-Eurodrive acts in concert;
- a relative, dependent or spouse of an individual who otherwise constitutes an Eligible Whistleblower; and
- any other person who is an eligible whistleblower in accordance with applicable legislation, including the *Corporations Act 2001* (Cth), from time to time.<sup>39</sup>

An Eligible Whistleblower can utilise the Whistleblower Policy when disclosing Disclosable Conduct. Disclosable Conduct is information that the Eligible Whistleblower has reasonable grounds to suspect concerns misconduct or an improper state of affairs or circumstances in relation to SEW-Eurodrive. This includes, but is not limited to, conduct which:

- constitutes fraud, negligence, default, a breach of trust or breach of duty;
- represents a danger to the public or financial system;
- constitutes an offence against any other law of the Commonwealth, State or Territory;
- is dishonest or illegal;
- is materially or potentially damaging to SEW-Eurodrive's financial performance or reputation;
- impedes internal or external audit processes; or
- is a breach of SEW-Eurodrive's Code of Conduct or other governance policies.<sup>40</sup>

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<sup>39</sup> SEW-Eurodrive Australian Whistleblower Policy.

<sup>40</sup> SEW-Eurodrive Australian Whistleblower Policy.

The whistleblower tool, which can be easily accessed from SEW KG's website, is available in 90 languages and provides suppliers and employees from all regions of the world with an opportunity to voice any concerns regarding modern slavery.<sup>41</sup> Most importantly, this tool provides a channel of communication for any potential whistleblower and provides anonymity to ensure and encourage accurate reports of instances of modern slavery within SEW-Eurodrive.<sup>42</sup>

## (b) Supplier code of conduct

In 2022, we undertook the process of drafting a supplier code of conduct (**Supplier Code**) that established our corporate values and outlines the expectations we have of our suppliers with respect to key issues including human rights.

The Supplier Code sets out our commitment to ethical procurement practices which meet the standards of business ethics and integrity as identified in the Ten Principles of the UN Global Compact.

SEW-Eurodrive does not condone the use of slavery, trafficking, child or forced labour within its supply chain or its own operations. Any suppliers that are engaged by SEW-Eurodrive must comply with the requirements of the Act and have the necessary infrastructure in place to assess and address the risk of modern slavery within their operations. SEW-Eurodrive reserves the right to take action if a supplier is not compliant with the Supplier Code, including corrective action, suspending engagement or terminating engagement. This is inclusive of being able to conduct due diligence and action appropriate remediation processes.

Under our Supplier Code, SEW-Eurodrive's suppliers must:

- (i) not discriminate against workers based on gender, age, ethnic origin, nationality, religion, disability, personal beliefs, marital status, union membership, political affiliation or sexual orientation;
- (ii) respect all employee rights, including the right to freely associate, bargain collectively and to establish or join industrial organisations without interference, harassment or discrimination;
- (iii) not use or condone the worst forms of child labour<sup>43</sup> in any of its operations and comply with the relevant legal minimum legal working age (or where there is no legal minimum, the supplier must comply with the International Labour Organisation (**ILO**) Minimum Age Convention (No. 138));
- (iv) not use any forced labour, bonded labour, indentured labour, debt bondage or prison;

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<sup>41</sup> Page 89 of 2022 Sustainability Report [https://master.sew-eurodrive.com/media/sew\\_eurodrive/unternehmen\\_und\\_karriere/unser\\_drive/nachhaltigkeit/sew-eurodrive-sustainability-report-2022.pdf](https://master.sew-eurodrive.com/media/sew_eurodrive/unternehmen_und_karriere/unser_drive/nachhaltigkeit/sew-eurodrive-sustainability-report-2022.pdf)

<sup>42</sup> Page 90 of 2022 Sustainability Report [https://master.sew-eurodrive.com/media/sew\\_eurodrive/unternehmen\\_und\\_karriere/unser\\_drive/nachhaltigkeit/sew-eurodrive-sustainability-report-2022.pdf](https://master.sew-eurodrive.com/media/sew_eurodrive/unternehmen_und_karriere/unser_drive/nachhaltigkeit/sew-eurodrive-sustainability-report-2022.pdf)

<sup>43</sup> As defined in Article 3 of the *International Labour Organisation Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour* (No. 182).

- (v) ensure workers are not required to pay recruitment fees or other fees for employment;
- (vi) adhere to the legal requirements for working hours and overtime (and in absence of an applicable law must be according to any relevant ILO Hours of Work (Industry) Convention<sup>44</sup>), with overtime not being excessive and not requested on a regular basis. Documentation for working hours must be accurate and transparent; and
- (vii) respect the freedom of movement of its workers and not restrict such movement by controlling personal identity papers (including passports, financial or other identification documents), holding monetary deposits or taking other similar action to prevent workers from ending their employment. Workers must be free to leave their employer upon providing reasonable notice.

### (c) Policies of the Group

Our parent company and largest supplier, SEW KG, has a Statement on Conflict Minerals even though it is not subject to the rules of the *Dodd-Frank Wall Street Reform and Consumer Protection Act* (US).<sup>45</sup>

Under this statement, SEW KG is committed to:

- » identifying which SEW KG products are impacted and targeting its efforts accordingly;
- » not buying products and materials containing Conflict Minerals (known as 3TG - Tantalum, Tin, Tungsten and Gold) directly from Conflict Mines; and
- » asking its suppliers to work towards ensuring that any Conflict Minerals contained in the products and materials supplied to SEW KG do not originate from Conflict Mines.<sup>46</sup>

SEW KG has taken active steps towards fulfilling these commitments by:

- » obliging its suppliers to avoid the use of Conflict Minerals by a retrospective provision within its general terms and conditions of purchase; and
- » where there is doubt regarding the use of Conflict Materials:
  - requiring its suppliers to complete the CFSI form; and/or
  - conducting an in-depth review of the supplier and its products.<sup>47</sup>

Suppliers must be able to provide SEW KG with a Conflict Minerals Reporting Template for its product portfolio.<sup>48</sup>

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<sup>44</sup> Or any other applicable ILO Convention.

<sup>45</sup> Source: [https://master.sew-eurodrive.com/media/sew\\_eurodrive/pdf/unternehmen\\_1/en\\_3/statement-on-conflict-minerals-17133645.pdf](https://master.sew-eurodrive.com/media/sew_eurodrive/pdf/unternehmen_1/en_3/statement-on-conflict-minerals-17133645.pdf)

<sup>46</sup> Ibid.

<sup>47</sup> Ibid.

<sup>48</sup> page 3 of product compliance guideline [https://www.sew-eurodrive.de/media/sew\\_eurodrive/lieferantenhandbuecher/supplier-information-for-product-confirmity-11-2022.pdf](https://www.sew-eurodrive.de/media/sew_eurodrive/lieferantenhandbuecher/supplier-information-for-product-confirmity-11-2022.pdf)

SEW KG has auditing processes and policies in place. These enable SEW KG to check that suppliers are abiding by the commitments they have made.<sup>49</sup> Further, auditing processes such as the sales process are implemented throughout the core SEW-Eurodrive processes and includes auditing operational and administrative steps and checks.<sup>50</sup> Audits provide verification that risks and internal controls are being managed effectively.

SEW KG also undertakes external ethical audits as part of its regular SEDEX certification process.

#### **(d) Supplier terms and conditions of purchase**

The suppliers engaged by SEW-KG are not entitled to have third parties (including sub-contractors) carry out the service for which it is responsible, without SEW-KG's written consent.<sup>51</sup> This means we have better visibility on our suppliers to enable us to be confident in knowing which entity is carrying out the service or providing the product we requested.

It is a contractual obligation that our suppliers must adhere to the laws of the respective legal system in which they operate.<sup>52</sup> Furthermore, our supplier terms and conditions of purchase contain the statement that "supplier[s] shall neither actively nor passively, directly nor indirectly be involved in any form of corruption, violation of its employees' basic rights or in child labour."

### **5.3 Building Awareness and Training**

We engaged an independent third party to conduct modern slavery training for key management staff and procurement staff. Our staff are of critical importance in identifying and helping us to address any instances of modern slavery. The training was designed to assist staff to understand the key signs of modern slavery and identify those who are most likely to be exposed to it.

We conducted this training during the reporting year. The training:

- » was conducted in a workshop-style which enabled our staff to engage and ask questions in relation to the topic;
- » explained the requirements of the *Modern Slavery Act 2018* (Cth);
- » detailed the Australian and international definition of modern slavery and examples of modern slavery;
- » covered supply chains and tips for identifying modern slavery; and

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<sup>49</sup> Page 93 of 2022 Sustainability Report [https://master.sew-eurodrive.com/media/sew\\_eurodrive/unternehmen\\_und\\_karriere/unser\\_drive/nachhaltigkeit/sew-eurodrive-sustainability-report-2022.pdf](https://master.sew-eurodrive.com/media/sew_eurodrive/unternehmen_und_karriere/unser_drive/nachhaltigkeit/sew-eurodrive-sustainability-report-2022.pdf)

<sup>50</sup> Page 90 of 2022 Sustainability Report [https://master.sew-eurodrive.com/media/sew\\_eurodrive/unternehmen\\_und\\_karriere/unser\\_drive/nachhaltigkeit/sew-eurodrive-sustainability-report-2022.pdf](https://master.sew-eurodrive.com/media/sew_eurodrive/unternehmen_und_karriere/unser_drive/nachhaltigkeit/sew-eurodrive-sustainability-report-2022.pdf)

<sup>51</sup> Clause 5(1) of Terms and Conditions of Purchase - [https://master.sew-eurodrive.com/media/sew\\_eurodrive/pdf/allgemeine\\_geschaftsbedingungen/en\\_2/terms\\_and\\_conditions\\_of\\_purchase.pdf](https://master.sew-eurodrive.com/media/sew_eurodrive/pdf/allgemeine_geschaftsbedingungen/en_2/terms_and_conditions_of_purchase.pdf)

<sup>52</sup> clause 13 of Terms and Conditions of Purchase - [https://master.sew-eurodrive.com/media/sew\\_eurodrive/pdf/allgemeine\\_geschaftsbedingungen/en\\_2/terms\\_and\\_conditions\\_of\\_purchase.pdf](https://master.sew-eurodrive.com/media/sew_eurodrive/pdf/allgemeine_geschaftsbedingungen/en_2/terms_and_conditions_of_purchase.pdf)

- » detailed specific policies and procedures that SEW-Eurodrive has which relate to modern slavery.

We also provide training to our employees on our whistleblowing policy on an online training system called "Learning Base".

## **6. Assessing the effectiveness of our actions**

SEW acknowledges that assessing the effectiveness of modern slavery actions is a key component in improving the ability to properly assess and address modern slavery risks. Although a complex process, assessing our effectiveness ensures that SEW-Eurodrive continues to improve our modern slavery mitigation processes and practices.

SEW is committed to maintaining systems that effectively identify, assess and address such risks in accordance with the Act and other relevant regulatory obligations.

A summary of the actions we have taken and the measures we take to assess the effectiveness of these actions are listed below.





Area	Actions	Assessing effectiveness	Commentary
Increase education and mitigate risks	Formally adopt supplier code of conduct	<ol style="list-style-type: none"> <li>1. Maintaining and periodically reviewing policy and its frameworks against key risks and the market.</li> <li>2. Taking into account feedback from suppliers and any key stakeholders for changes and improvements.</li> <li>3. Monitoring compliance with the Supplier Code.</li> </ol>	During FY22, we began drafting our Supplier Code. We intend to formally adopt the Supplier Code in FY23.
	Conducting staff modern slavery training	<ol style="list-style-type: none"> <li>1. Key managers and procurement staff are aware of our obligations under the Modern Slavery Act. They also now better understand the issues and factors of modern slavery.</li> <li>2. Provide opportunity for feedback and engagement during the training.</li> </ol>	During FY22, we conducted modern slavery training for our key managers and procurement staff.
Robust framework and SEW systems to address risks	Already established policy framework, including: <ul style="list-style-type: none"> <li>• Human rights policy.</li> <li>• Code of Conduct.</li> <li>• Whistleblower policy.</li> <li>• Supplier Code of Conduct.</li> <li>• Statement on Conflict Minerals.</li> </ul>	<ol style="list-style-type: none"> <li>1. Monitoring compliance with policies.</li> <li>2. Regularly assess if our policies are fit for purpose.</li> <li>3. Take remedial action for breach of policies as required on a case by case basis.</li> </ol>	During FY22, we conducted a review of our policies for mention of modern slavery. We also began drafting our Supplier Code, which we expect to adopt in FY23.
	Introduction of Whistleblower Hotline and online tip-off tool (in 90 languages)	<ol style="list-style-type: none"> <li>1. Comply with procedures in place and properly investigate any acquisitions made.</li> <li>2. Take remedial action as required on a case by case basis.</li> </ol>	There were no whistleblower disclosures during the 2022 reporting year.

	Board oversight of modern slavery response	<ol style="list-style-type: none"> <li>1. Board approves the modern slavery statement.</li> <li>2. Board discusses actions taken and reviews SEW-Eurodrive's actions at Board meetings</li> </ol>	During FY22, the Board discussed and approved the proposed modern slavery response. During FY23, the Board approved this modern slavery statement.
Assess and audit risks, and due diligence	SEW KG intends to audit strategic suppliers to ISO standards 45001 for occupational health and safety and for sustainability. <sup>53</sup>	<ol style="list-style-type: none"> <li>1. Check in with SEW KG regarding the audit process and outcomes and support any actions taken or initiatives introduced following this audit.</li> </ol>	This is a commitment made by our parent company in its Sustainability Report for 2022.
	Third party assessment of our modern slavery risks.	<ol style="list-style-type: none"> <li>1. Updating data as required.</li> <li>2. Periodically assessing supplier updates for dynamic risks.</li> <li>3. Monitoring any suppliers that are medium or high risk and taking appropriate remediation and due diligence as required for those suppliers.</li> </ol>	During FY22, we undertook an analysis of third party data assessment companies. We started to engage with Informed 365 in FY22. We expect the data to be assessed in FY23 and details of the results of such assessment included in our FY23 modern slavery statement.
Stakeholder Engagement	Engage external advisers to assist in our modern slavery response	<ol style="list-style-type: none"> <li>1. Engage with advisers as required.</li> <li>2. Implement recommendations as required.</li> <li>3. Joining the Peer Informed 365 Industry initiative</li> </ol>	During FY22, we engaged external advisers to assess our current modern slavery response and to recommend future outcomes and actions. This allowed us to independently assess our modern slavery response and receive industry expertise on the gaps in our response.

<sup>53</sup> Page 93 of 2022 Sustainability Report [https://master.sew-eurodrive.com/media/sew\\_eurodrive/unternehmen\\_und\\_karriere/unser\\_drive/nachhaltigkeit/sew-eurodrive-sustainability-report-2022.pdf](https://master.sew-eurodrive.com/media/sew_eurodrive/unternehmen_und_karriere/unser_drive/nachhaltigkeit/sew-eurodrive-sustainability-report-2022.pdf)

## 7. Consultation with other entities and Board Approval

SEW-Eurodrive does not own or control any other entity and therefore does not need to describe the process of consultation with such entities.

This Statement has been approved by the Board of Directors of SEW-Eurodrive (the reporting entity). David O'Halloran, as a Director of the reporting entity, was authorised to sign this Statement on behalf of SEW-Eurodrive.

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David O'Halloran

Director, SEW-Eurodrive Pty. Ltd. ACN 006 076 053