

29 June 2021

## **Dometic Australia 2020 Modern Slavery Statement**

The Dometic Group's underlying principles are built on innovation, sustainability, compliance with international and national legislation, support & respect for the United Nations Global Compact as well as other international ethical guidelines.

While Dometic Australia has not identified any instance of Modern Slavery practices, the two areas of the business that are potentially susceptible to Modern Slavery risk are people and our supply chain.

In this statement Dometic Australia and the broader Dometic Group outlines any action taken to date and/or planned action that will enhance our ability to identify and address the risk of Modern Slavery in our operations and supply chain.

Within the broader Dometic Group, we take responsibility to further develop and refine processes and systems with our suppliers, our employees and external stakeholders, not only to reduce Modern Slavery risks, but also how we can identify and address them in advance.



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## 1. About Dometic Group

Dometic Group AB (“**Dometic**”) is a global market leader in branded solutions for mobile living in the areas of Food & Beverage, Climate, Power & Control and Other Applications.

Dometic operates in the Americas, EMEA and Asia Pacific, providing products for use in recreational vehicles, pleasure and workboats, trucks, and premium cars and for a variety of other uses.

Our motivation is to create smart and reliable products with outstanding design. We sell our products in approximately 100 countries and we have a global distribution and dealer network in place to serve the aftermarket.

Dometic employs approximately 6,500 people worldwide, had net sales of approximately SEK 16.2 billion in 2020 and is headquartered in Stockholm, Sweden.

## 2. Introduction

This Modern Slavery Statement (“**Statement**”) relates to Dometic Australia Pty Ltd ABN 62 086 366 305 (“**Dometic**”) and is published by Dometic Australia pursuant to the Modern Slavery Act 2018 (Cth) (Act). This is the first Statement made by Dometic and relates to the financial year ended 30 December 2020.

Dometic recognises the role that businesses play in understanding, addressing, and mitigating Modern Slavery practices throughout business operations and our global supply chain. Dometic is continually working with our employees, suppliers, contractors, and external stakeholders to identify instances of Modern Slavery and address the risks.

Dometic’s Code of Conduct and governing documents includes a number of policies and procedures that are intended to promote ethical and legally compliant business conduct. Dometic Group’s Annual report also contains additional information on ethics and our business partners.

## 3. Dometic Australia Business Summary

Dometic Australia is a wholly owned subsidiary of listed Dometic Group AB (DOM:SS). Dometic Group is a publicly listed company, headquartered Stockholm Sweden.

Dometic Australia is a primarily a retail and trade sales, import and distribution organisation with in-house technical service capabilities. Our Australian operations consist of warehouses and sales offices in Victoria, Queensland, and Western Australia. Dometic Australia employs 109 staff across Australia.

## Structure operations and supply chain

As part of a global group and importer, Dometic Australia has a diverse supply chain, purchasing finished goods and spare parts from a variety of countries across, Europe, the U.K., China, South East Asia, and North America. A very small proportion of goods (<1%) are locally assembled in Australia.

Finished goods and spare parts are distributed throughout Australia through company owned distribution centres and eCommerce stores, and also directly to third party Original Equipment Manufacturers (OEMs), wholesale trade & retail customers. A small number of products are also be exported to New Zealand.

In additional to the main range of Dometic branded products, Dometic Australia also distributes a small selected range of third-party brands.

Approximately 90% of goods are sourced from factories owned and operated by Dometic.

## 4. Potential Risk & Exposure

Dometic Australia has undertaken an assessment on the potential exposure points for Modern Slavery as per below. This assessment also considers any countermeasures that Dometic Australia is undertaking as an Australian entity and/or part of the broader Dometic Group.

Area	Potential Modern Slavery Risk	Countermeasures
<b>Sector and industry</b>	<p><b>Manufacturing operations &amp; global distribution of products</b></p> <p>The manufacture of goods (both in Australia and foreign jurisdictions) may necessitate the use of manual and/or low-skilled labour.</p> <p>Transport of goods from low or underpaid providers.</p>	<p><b>All Dometic employees must adhere to the Code of Conduct, Dometic owned factories have robust internal governance on employment and procurement</b></p> <p>Dometic's labour workforce has a high degree of oversight, both within the applicable country and from our Swedish head office. Employment conditions are routinely benchmarked to ensure compliance with local labour laws.</p> <p>Dometic also has established relationships with reputable logistics and freight carriers that are also subject to the Code of Conduct.</p>
<b>Product &amp; Services</b>	<p><b>High-risk providers</b></p> <p>Dometic may utilise third party service providers in overseas locations that are globally associated with instances of Modern Slavery – e.g. catering, cleaning, or transport services.</p>	<p><b>Supplier due diligence &amp; compliance with the Dometic Code of Conduct</b></p> <p>Dometic assesses and engages service providers that have signed and agreed with the Code of Conduct and have a proven track record of compliance.</p>

Area	Potential Modern Slavery Risk	Countermeasures
	<p><b>High-risk products</b></p> <p>Dometic may source components or products from suppliers that have operations in countries implied with Modern Slavery conditions – e.g. South East Asia, China.</p>	<p><b>Supplier visits from Dometic Supplier Quality Engineers (SQE) &amp; compliance with the Dometic Code of Conduct</b></p> <p>Dometic has an explicit policy of using reputable suppliers of purchased parts that do not engage or use child or prison labour or other sources that would be categorised as a Modern Slavery risk in their manufacturing operations.</p> <p>Dometic has a team of SQE employees that undertake site visits and maintain strong relationships with suppliers.</p>

## 5. Dometic Australia and Dometic Group Actions

Dometic’s Code of Conduct and additional governing documents lay out the framework for how the Group acts and follows up business practices. The Code of Conduct applies to all employees as well as business partners.

In 2020, a new revised version of the Code of Conduct was rolled out in the organisation. The Dometic Group board also approved and rolled out a new policy, the Dometic Code of Conduct for Business Partners, such as suppliers. The new Code of Conduct for Business Partners clarifies Dometic’s requirements of business partners in terms of ethical business practices.

Dometic is a signatory to the UN Global Compact and committed to working with the ten universally accepted principles in the areas of human rights, labour, the environment and anti-corruption.

### Anti-corruption

Dometic’s Code of Conduct strictly prohibits engaging in or facilitating any kind of corruption, including fraudulent actions, bribery, facilitation payments or money laundering. Dometic’s relationships with business partners are based on high ethical standards and business practices that aim to prevent unethical behaviour throughout the value chain. These practices strengthen the Dometic brand and contribute to fair market competition.

### Training and Awareness

All Dometic employees are trained in the Code of Conduct. The training program provides hands-on examples from the workplace to practice expected behaviours in difficult situations. No matter where they are in the world, new employees are invited and expected to complete the training program within their first few weeks of employment. In 2020, a new training program was launched to better reflect the new Code of Conduct.

Ninety-five percent of white-collar workers and ninety five percent of blue-collar workers completed the Code of Conduct awareness program in 2020. The KPI for white-collar workers is on track towards target, however there was a reduction in 2020 mainly due to timing of registrations. The Dometic engagement survey carried out in late 2019 confirms that there is high awareness and a good understanding of the Code of Conduct in the organisation.

### **Whistleblowing**

The Dometic whistle-blower system, called the Dometic SpeakUp Line, is available for reporting in all Dometic Group languages. It offers Dometic's employees an anonymous channel in which to report any business activities or behaviours that are potentially in breach of the Code of Conduct or applicable laws and regulations. Dometic's SpeakUp Line is managed by a third-party vendor to ensure full privacy. The whistle-blower system is confirmed to be widely known and used throughout the organization.

In 2020, about half of the reported cases led to investigations and actions.

The other cases were guided to other appropriate channels or closed due to irrelevance.

At the end of 2020, a new awareness campaign was launched internally to maintain high awareness of the SpeakUp Line and how to report breaches.

### **Business Partners**

Working with business partners who share Dometic's high standards regarding business ethics, quality and resource efficiency is necessary to effectively manage risks and enhance efficiency in the value chain.

As a global company, Dometic sources from countries with varying levels of risk exposure to corruption, human rights abuses, and Modern Slavery. The Group has around 3,200 suppliers of direct material in around 43 countries. The biggest categories of material bought by Dometic are metal components, plastic components, electronic components and traded products.

To ensure that suppliers meet the standards for responsible and ethical business practices, suppliers are required to comply with the principles set forth in the Dometic Code of Conduct for Business Partners.

The Group's Sourcing Council and regional sourcing organisations monitor compliance with the Code of Conduct for Business Partners through supplier self-assessments and on-site audits. In 2020, 95 percent of suppliers confirmed compliance with the Dometic Code of Conduct and 82 percent of the direct material supplier spend in low-cost countries has been audited in the past two years.

Dometic’s strategy to reduce complexity and the number of suppliers enables better assessment and follow-up of suppliers. In conjunction with the roll-out of the Code of Conduct for Business Partners, an internal training program for sourcing and the supplier audit organisation was introduced in order to ensure a good understanding of the supplier requirements of the Code of Conduct for Business Partners and how to conduct audits to verify compliance with these requirements.

To further strengthen due diligence and evaluate the effectiveness of the internal processes, Dometic has piloted a partnership with third party auditors to assess a selection of suppliers with a focus on business ethics, social conditions and environmental compliance.

Continue to implement the Code of Conduct WHITE-COLLARS		Continue to implement the Code of Conduct BLUE-COLLARS		Continue to implement the Code of Conduct SUPPLIERS		Conduct supplier audits	
Target	100%	Target	100%	Target	100%	Target	90%
Actual	95%	Actual	95%	Actual	95%	Actual	82%
Baseline	98%	Baseline	0%	Baseline	34%	Baseline	Not applicable

- FOCUS AREA ETHICS TARGETS 2019–2021**
- ▶ **Continue to implement the Code of Conduct**  
100 percent of employees (white-collar and blue-collar) complete e-learning on the Code of Conduct.  
100 percent of suppliers of direct material adhere to the Dometic Code of Conduct.
  - ▶ **Implement training program on anti-trust and export control**  
100 percent of the senior managers and sales employees complete e-learning on anti-trust and export control.
  - ▶ **Conduct supplier audits**  
90 percent of the spend of direct material suppliers in low-cost countries to be audited every second year.

- KEY ACTIVITIES 2019–2021**
- ▶ Ensure that all blue-collar workers receive training on the Code of Conduct.
  - ▶ Develop e-learning courses on anti-trust and export control regulations.
  - ▶ Strengthen the supplier audit organization.
  - ▶ Develop new global audit template and plan for supplier audits.
  - ▶ Accelerate supplier audits.
  - ▶ Implement structured ESG screening as part of the due diligence process for acquisition targets.
  - ▶ Continue to ensure GDPR compliance.

## 6. Future Actions

Dometic Australia will continue to update and review this Modern Slavery Statement on an annual basis. We will continue to uphold and implement the Dometic Group Code of Conduct especially on ethical sourcing and Modern Slavery.

Further information can be found at:

[www.dometic.com/en-us/us/about-us/our-company/sustainability/sustainability-reports](http://www.dometic.com/en-us/us/about-us/our-company/sustainability/sustainability-reports)

This Statement forms part of Dometic Australia's risk management and corporate governance framework and has been approved by the board of Dometic Australia Pty Ltd as its principal governing body on 28-June 2021.

A handwritten signature in blue ink, appearing to read 'Trent Rowe', is positioned above the printed name.

Trent Rowe

Managing Director (Australia & New Zealand) and member of the board of Dometic Australia Pty Ltd

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