

## Modern Slavery Statement

### INTRODUCTION

Modern slavery can occur in every sector and industry and, like many human rights violations, is often hidden in plain sight. Given the prevalence of modern slavery globally, it is highly likely that companies and organisations are exposed to modern slavery risks. To address this global human rights issue, the Australian Government passed the Modern Slavery Act 2018 (Cth), which entered into force on 1 January 2019.

The objective of the Modern Slavery Act is to increase transparency and accountability by establishing an annual reporting regime. Flick Anticimex is committed to ensuring our procurements and purchases promote supply chains that are free from exploitation and send a clear message that modern slavery is unacceptable. We will build on our response over the coming years by being an advocate and working with key partners to raise awareness of modern slavery practices. Our core component of this commitment is with the end goal of ending modern slavery.

This statement is made in accordance with section 13 of the Modern Slavery Act 2018 and covers the period 1 October 2023 to 30 September 2024.

Modern slavery is a crime that deprives an individual's liberty and dignity for another's gain. The Australian Government estimates that there are approximately 1500 victims of modern slavery in Australia at any time. The United Nations estimates that at least 40 million people around the globe are in modern-day slavery. Those most at risk include women and children who may have little or no capacity to protect themselves.

This statement sets out the actions we have taken to address modern slavery risks and the strategies we will implement to prevent slavery and human trafficking within our operation and supply chains.

### OUR VALUES

Our values are the core of our business which glues all other pieces together. They are the guideline for action. Through our values we empower all employees to make decisions, take responsibility and take an active role in the continual growth and development of the company.

- Trust
- Innovation
- Passion

### POLICIES



Our commitment to mitigating the effects of modern slavery is upheld by our frameworks, policies, and procedures. These include but are not limited to the below Flick Anticimex's policies.

Code of Conduct Policy – which outlines the principles of expected behavior and conduct of Flick Anticimex employees, sub- contractors, and business partners.

Industrial Relations Policy – this includes, but is not limited to, protecting employees from unfair treatment and discrimination by ensuring compliance with legal obligation, providing accessible and effective grievance and dispute resolution procedures, and recognising the right to freedom of association and the right to be represented. Flick Anticimex commits to abide by the legally required minimum wages and to respect limitations on the hours of work and overtime obligations.

Whistle Blower Policy – which supports our people to observe high standards of good governance and ethical behavior and feel supported to safely disclose matters which may be inconsistent with modern slavery laws.

## OUR OPERATIONS

Flick Anticimex commenced operations in 1918, and we now have over 1,000 technicians & 500 administration staff, servicing over 300,000 customer sites annually. We protect over 55,000 commercial sites and 180,000 residential customers from pests every year. We also keep our commercial customer's premises hygienically clean by servicing over 54,000 washrooms sites. Flick Anticimex is regarded as Australian No. 1 and one of New Zealand's Leading Pest Control & Hygiene companies.

## OUR SUPPLY CHAIN

Flick Anticimex obtain goods and services from both domestic suppliers as well as international suppliers in the Asia Pacific Region, Europe, North and Central America. This includes finished goods, packaging, freight services, IT Services, utilities, and consulting services.

The supply of products is managed internally by our Australian procurement team using Australian suppliers to supply chemical & goods. Our SMART range of products are developed & manufactured in Sweden by our parent company Anticimex.

We reject modern slavery in all its forms, and we seek to manage this through appropriate controls embedded in our procurement processes and procedures. We are not aware of any issues of modern slavery in our supply chain, but we recognise the importance of continuing to be vigilant in managing the risk. We have long-standing relationships with many of our suppliers, which was founded on transparency and supply reliability.

## POTENTIAL RISKS WITHIN OUR SUPPLY CHAINS



## **1. Labor Exploitation and Forced Labor in Supply Chains**

**High-Risk Sectors:** Certain industries are more prone to modern slavery, including agriculture (e.g., fruit picking), construction, manufacturing, mining, and garment/textile production. These sectors may involve workers who are vulnerable to exploitation, such as migrant workers or those in temporary and low-skilled roles.

**Overseas Suppliers:** Entities that source goods or services from overseas, particularly from countries with weak labor laws or poor enforcement of labor rights, may inadvertently be linked to forced labor, child labor, or other forms of exploitation.

**Subcontracting Chains:** Modern slavery risks can be hidden deeper in supply chains, especially when companies use subcontractors or operate in countries with less stringent labor laws. Even indirect or tiered suppliers may be involved in practices such as forced labor, debt bondage, or human trafficking.

## **2. Vulnerable Worker Populations**

**Migrant and Temporary Workers:** Migrants, especially those on temporary or precarious work visas, are particularly at risk of exploitation. Vulnerable workers may face coercion, poor working conditions, unsafe environments, or be forced to accept low wages.

**Women and Children:** Women, particularly in domestic work, garment factories, or agriculture, and children, especially in sectors like mining, agriculture, and construction, are disproportionately affected by modern slavery practices.

**Indigenous Populations:** Indigenous workers in Australia or other regions within the supply chain may also face exploitation in terms of low wages, poor conditions, and lack of access to employment rights or protection.

## **3. Poor Working Conditions and Exploitative Practices**

**Wage Theft and Unpaid Labor:** Some entities may unknowingly source from suppliers who engage in wage theft, underpayment, or non-payment for labor, which can be a form of modern slavery.

**Overworking and Involuntary Overtime:** In certain supply chains, workers might face excessive working hours, often without proper compensation, which is a form of exploitation.

**Unsafe or Inhumane Working Conditions:** Conditions such as inadequate accommodation, lack of proper sanitation, or dangerous working environments can contribute to modern slavery risks.

## **4. Lack of Transparency and Due Diligence**

**Limited Visibility:** Modern slavery risks are often hidden in the deeper tiers of supply chains. Without robust due diligence and transparency, it can be difficult to detect and address exploitation.

**Weak Supplier Codes of Conduct:** Suppliers in some regions may lack clear or enforceable codes of conduct that address modern slavery, and reporting entities may not actively audit or monitor these suppliers.

## **5. Governance and Accountability Risks**

**Inadequate Risk Assessment Processes:** If a reporting entity does not have a comprehensive risk management framework that includes modern slavery as a key focus area, it may fail to adequately assess or address risks in its supply chain or operations.

**Failure to Monitor and Act:** Businesses that do not continuously monitor their supply chains for signs of modern slavery or do not act swiftly to address identified issues may find themselves inadvertently complicit in such practices.

## 6. Geographic and Regulatory Risks

**Operating in High-Risk Jurisdictions:** Entities with operations or suppliers in countries with weak or poorly enforced labor laws may be more exposed to modern slavery risks. Businesses need to be aware of the legal, cultural, and social factors that increase vulnerability to exploitation in those regions.

**Changing Regulations:** The evolving regulatory environment in Australia and internationally may pose risks if entities do not adapt their practices to remain compliant with both local and global anti-slavery initiatives and legislation.

## 7. Reputational and Legal Risks

**Public Scrutiny:** Companies are increasingly held to account by consumers, investors, and civil society for their role in perpetuating modern slavery. Failing to address these risks can result in reputational damage, loss of consumer trust, and legal action.

**Legal Liabilities:** Non-compliance with the Modern Slavery Act or failure to disclose modern slavery risks in annual reports could expose entities to legal and regulatory sanctions.

## 8. Risks Associated with Entities Owned or Controlled by the Reporting Entity

**Subsidiaries and Affiliates:** Modern slavery risks can extend to entities owned or controlled by the reporting entity, especially in regions or sectors where the risks are higher. The reporting entity must ensure that subsidiaries adhere to similar standards and practices in terms of combating modern slavery.

**Acquisitions and Mergers:** When companies acquire or merge with other entities, there is a risk that modern slavery issues may be inherited or overlooked, particularly if the acquired entities were not previously subject to modern slavery reporting obligations.

## MITIGATION STRATEGIES

To address these risks, Flick Anticimex will:

Conduct thorough due diligence on their supply chains, particularly in high-risk areas.

Develop and enforce strong codes of conduct for suppliers that explicitly prohibit modern slavery practices.

Implement regular audits, monitoring, and transparency measures to identify and address slavery risks.

Work with local and international organizations, including NGOs, to combat exploitation and ensure compliance with the Modern Slavery Act.

Provide training to staff and suppliers on modern slavery risks and how to report concerns.

By addressing these risks effectively, businesses can reduce the likelihood of modern slavery occurring within their operations and supply chains, and ensure compliance with Australian law, while also contributing to global efforts to eradicate exploitation.

### Methods

- Setting Clear Objectives and Key Performance Indicators (KPIs) by Identifying high-risk suppliers or sectors for modern slavery.
- Implementing policies, codes of conduct, and training programs and increasing the transparency and traceability of supply chains.
- Engagement with Stakeholders, including suppliers, employees, industry groups, and NGOs
- Due Diligence and Risk Assessments by reviewing supplier practices, country risks, and industry-specific risks & conduct regular assessments of suppliers and contractors to ensure they adhere to contractual obligations related to human rights and modern slavery.

- Monitoring and Reporting Mechanisms such as Internal audits and reviews of anti-slavery policies, practices and reporting systems. such as providing training to staff and suppliers on modern slavery risks and how to report concerns.
- Transparency and Public Disclosure by assessing the effectiveness of its actions by reviewing how transparent and comprehensive its disclosures are compatible with international best practices and industry standards.
- Continuous Improvement and Remediation by assessing effectiveness also involves identifying areas for improvement and implementing corrective actions where necessary.

## MODERN SLAVERY AWARENESS PRACTICES

The following Modern Slavery Awareness Practices have been put in place:

- Compulsory training for all managers to raise staff awareness around modern slavery and the company's obligation under the current legislation.
- Engagement with classification I and II suppliers ensuring our suppliers' code of conduct is always understood and adhered to.
- Continue ongoing due diligence with classification I and II suppliers, identifying key risk areas via detailed supplier questionnaires, interviews, and site visits.
- Update supplier service level agreements with the implementation of modern slavery and code of conduct provisions.
- It is the duty of all Flick staff to report any potential breach of the act either from within Flick operations or suppliers to senior management or to the company ombudsman so it can be investigated by our internal audit team.
- Our Speak up & Whistle Blower systems uses a dedicated phone number to report any concerns anonymously. This system can be used by Flick employees or by our suppliers to report any breaches of the act. This system is managed by our parent company, Anticimex.



In the context of Australian Modern Slavery reporting, consultation processes are integral to ensuring that all relevant entities are involved in assessing and reporting the risks of modern slavery in the operations and supply chains. The Modern Slavery Act 2018 (Cth) requires certain entities to provide a Modern Slavery Statement, and this includes consultation with owned or controlled entities as well as other entities in certain circumstances.

Our Consultation process includes:

#### Consultation with Entities Owned or Controlled by the Reporting Entity

Under the Modern Slavery Act 2018 (Cth), if a reporting entity owns or controls other entities, there is an obligation to consult with these entities during the process of preparing the Modern Slavery Statement. This ensures a comprehensive approach to identifying and addressing modern slavery risks across the entire corporate group, including subsidiaries and any entities that may be directly or indirectly controlled by the reporting entity, and

#### Consultation with the Entity Giving the Statement (Section 14 Statement)

For entities that are covered by a statement under Section 14 of the Modern Slavery Act, the reporting entity must also consult with the entity that is preparing the statement. A Section 14 Statement is typically prepared by an entity that controls or owns the reporting entity, or by a parent company within a group, and

Coordination within the company as a whole, clarification of roles & responsibilities and working together in addressing group wide identified risks whilst having complete transparency and provide documentation to demonstrate compliance with the Act.

## MEASURING OUR PERFORMANCE

The specific processes required to assess and address the risks of modern slavery will be a new undertaking. To assess the effectiveness of these processes, applied to the entire procurement lifecycle, we will undertake the following:

- Quantify the number of existing suppliers that have completed the initial risk assessment, as this process will be incorporated into all future approaches to the market.
- Quantify the number of staff who undertake training.
- Statistics on the steps taken which will be provided in future modern Slavery Statements.

Flick Anticimex is committed to continually improving our policies and procedures to eliminate modern slavery and safeguard our sustainable procurement initiatives.

This statement has been approved by the board of directors of Flick Anticimex PTY LTD in their capacity as the principle governing body of Flick Anticimex PTY Ltd on the 9th of January 2025.



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Andreas Sahlbom  
Chief Executive Officer / President

A handwritten signature in black ink, consisting of a stylized 'G' followed by a long horizontal stroke.

Gordon Chan  
Chief Financial Officer