



“Doing Things Differently”



**MODERN SLAVERY
STATEMENT 2024**

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1. Background

Total Ventilation Hygiene (TVH) Pty Ltd is committed to being a good corporate citizen, guided by strong governance and business ethics principles. Respecting human rights is embedded in our core values and organisational culture.

As a key component of our overall Environmental Social Governance (ESG) strategy, we are committed to contributing to eradicate modern slavery where it may exist in our operations and supply chain. TVH recognises that modern slavery can occur in every industry and sector and has a severe consequence for victims, and that we may be at risk of indirect exposure. We do not tolerate slavery, human trafficking, forced or child labour or child exploitation, and are continuously improving our understanding of the risk and our effort in identifying, minimising and mitigating this risk.

2. Purpose

This Modern Slavery Statement (Statement) is made pursuant to the Modern Slavery Act 2018 (Cth) in relation to the operations and supply chains of Total Ventilation Hygiene (TVH) in the period from 1 July 2023 to 30 June 2024 and was approved by TVH's Board of Directors on 06/11/2024.

3. The reporting entity, operations and supply chain

The reporting entity

The reporting entity is Total Ventilation Hygiene (TVH) Pty Ltd (ABN 15 149 359 437), a company registered in Australia at Unit 1, 25-33 Alfred Road Chipping Norton NSW 2170. This Statement is made by TVH on behalf of 100% owned and controlled entities (collectively, "TVH").

Our operations

Commenced in 2011, TVH provides Heating Ventilation Air Conditioning & Refrigeration (HVAC & R) systems servicing, maintenance and installation, HVAC hygiene and remediation, duct and kitchen exhaust cleaning services and maintenance, electrical, fire, commercial plumbing and general handyman and ground maintenance services across government, defence, commercial, retail, educational, health and aged care facilities across all states and territories.

TVH employs over 600 staff (including full time, part time, casual and shift workers) nationally across 42 locations in Australia.

Our supply chain

TVH continues to have many direct and indirect suppliers that contribute to the ongoing functioning and operations of the business, both by way of subcontracted labour hire and the purchase of equipment, parts and accessories, and tools. We define direct (or Tier 1) supplier as an organisation who provides labour, goods and services directly to TVH and with whom TVH has a contractual agreement in place. Our Tier 1 suppliers are further categorised as below.

Category characteristics

Trade Services

This group of suppliers (also referred to as subcontractors) represents around 40% of TVH spend in the reporting period. Services provided by these vendors primarily include labour-based services in HVAC mechanical, air conditioning maintenance, electrical maintenance, hydraulic (plumbing) maintenance and fire systems maintenance. TVH engaged the service of 410 subcontractors in the reporting period.

Industrial Consumables, Plant Hire & Equipment

This category includes suppliers of industrial consumables and tools of trade, parts/components, uniforms, Personal Protective Equipment & safety equipment, furniture and temporary plant hire, vehicle leasing, consulting services. The goods and services of these suppliers contributed directly into TVH services provided to our customers. TVH engaged with 650 suppliers in this category in the reporting period.

Corporate Services

This category includes suppliers of goods and services that were used directly in own operations, such as travel & accommodation, IT software and equipment, telecommunication, electricity, rent, stationery, waste disposal, cleaning and professional services such as recruitment, finance, legal and other consultants (such as tax accountant). TVH engaged with 90 suppliers in this category in the reporting period.

4. Modern slavery risks in our operations and supply chain

Our employees

TVH direct workforce is predominantly made up of skilled employees who have full working rights in Australia which are verified prior to commencement of their employment. In addition, each employee's employment at TVH is covered either by a specific industry award administered by the Fair Work Commission, or the National Employment Standards. Therefore, we consider the inherent risks of modern slavery within our own operations to be very low.

Trade services category

TVH engaged with about 410 Australia based labour hires/subcontractor companies in the reporting period to complement the facility management services we provide to our clients where necessary or where we did not have the expertise in house. We have a prequalification process prior to engagement, and our subcontractors are required to acknowledge and sign TVH's Supplier Code of Conduct which includes provisions for modern slavery.

Due to the specialist nature of trade services, all subcontractors are required to maintain valid and appropriate trade contractor licences, occupational licences and insurances. Therefore, the risk of modern slavery within our subcontractor base is assessed to be low.

Other supply chain categories

TVH had 740 suppliers of goods and services in the reporting period and acknowledge that the highest concentration of modern slavery risk in TVH's supply chain is within this segment. We continue to review and qualitatively assess the modern slavery risk associated with our suppliers based on several parameters

- Country Slavery Risk
- Category/Industry Risk

Country Slavery Risk

We rely on the Global Slavery Index, published by Walk Free (an international not-for-profit human rights advocate organisation) to assess the inherent risk by country of suppliers. We source all our goods and services from suppliers who are based in Australia. According to the Global Slavery Index, Australia is among the least vulnerable countries to modern slavery in the Asia Pacific region and globally [Modern slavery in Australia | Walk Free](#).

Category/Industry Risk

Despite a relatively low country risk factor for Australia, there are known products categories that carry higher risk of modern slavery within their supply chains, such as electronics, garments, solar panels, textiles, and industry sectors which employ holders of working holiday, seasonal worker, international student, skilled temporary work and bridging visas. Thus, possible risks remain for TVH in this segment are:

- Geographical traceability of the product and equipment supply chain: our products are purchased from retailers/wholesalers and distributors with a varying network of suppliers.
- Accessibility and accuracy of information and our supplier's commitment to adhering to the Modern Slavery Act.

5. Our actions

A summary of TVH focus area and corresponding actions is presented below.

Focus Area	Actions to Date
Policy & Procedure	Our commitments to reducing modern slavery vulnerability in TVH operations and our supply chain are supported by policy, procedural and governance framework, including our Sustainable Purchasing Policy, Corporate Social Responsibility Policy, Code of Conduct, Supplier Code of Conduct, Supplier Evaluation Procedure and Subcontractor Questionnaire.
Supplier Engagement	TVH has implemented a risk management process that ensures all new and old suppliers adhere to our Supplier Code of Conduct, which outlines the requirements suppliers are expected to meet to do business with TVH, including requirements in relation to labour practices and human rights. We have created a supplier pack that provides a declaration of compliance to ensure that they are conforming with the requirements of modern slavery, human trafficking and human rights.

Grievance and Remediation	TVH has established a grievance policy, whistleblower policy and mechanisms that enable our direct employees as well as that of our suppliers to raise any concerns, including concerns regarding modern slavery and human rights.
Awareness and Training	TVH launched a compulsory Modern Slavery training for key staff members such as Area Managers, Operations Managers, Administration Managers and senior leadership to raise awareness among our employees about modern slavery.

6. Effectiveness assessment

In the reporting period, we achieved a reasonable level of compliance with our stated objectives, as follows:

- 100% of key employees completed modern slavery training
- 0 reports/incidents of suspected modern slavery within our operations and supply chain

7. Looking ahead

TVH has built a strong foundation for addressing modern slavery related risks, however we acknowledge that there is more work to be done, and the effort to identify and mitigate modern slavery risks in our operations and supply chain is ongoing. Our priorities for financial year 2024-2025 include:

- Investment in a resource dedicating to improving our modern slavery framework, supplier due diligence and risk assessment
- Establishing a formal supplier due diligence, engagement framework and playbook
- Improving data capturing in relation to supplier categories and spend
- Improving our internal training to make it more relevant to TVH’s operational context and the associated risks

8. Consultation

TVH’s modern slavery efforts continued to receive considerable attention from our Directors and senior leadership team, with progress on the supplier engagements regularly communicated among the operational leadership team. TVH also regularly provides our clients with information regarding our approach to mitigating modern slavery vulnerability.

9. Other information

This Statement has been issued on behalf of Total Ventilation Hygiene Pty Ltd by Joshua Leys, a Director of the entity, on 06/11/2024.



Joshua Leys
Managing Director