

**Shimano Oceania Holdings Pty Ltd**

**Modern Slavery Statement - Modern Slavery Act 2018**

**Reporting Period: 1st January 2021 - 31st Dec 2021**

**Reporting Year: Year 2**

**SHIMANO**

## **Mandatory Criterion 1 - The Reporting Entities**

This statement meets the requirements for approval & signature as set out in section 14 of the Commonwealth Modern Slavery Act 2018.

### **Shimano's Human Rights Commitment**

Modern Slavery is a heinous crime & a morally reprehensible act that deprives a persons liberty, dignity for another persons gain.

It is a real problem for millions of people around the world, including many in the developed countries, who are being kept & exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations & its supply chain.

At Shimano Oceania Holdings Pty Ltd, we have a zero tolerance approach to modern slavery & are fully committed to preventing slavery & human trafficking in our local operations & in our Shimano global supply chain.

Shimano is a global operating group, as such not all companies are subject to the Australian Modern Slavery Act.

As a global operating company in manufacturing & sales, Shimano has taken concrete steps in it's global operations to tackle modern slavery, as outlined in our statement.

To strengthen the confidence in 'Team Shimano' from all stakeholders & business partners by complying with our daily business activities through the application of Shimano's 'Global Code of Conduct'.

By adhering to Shimano's Code of Conduct, Shimano maintains a sound work force, promotes cooperation and provides a safe working environment.

As stated in the 'Code of Conduct'; Shimano complies with applicable labour-related laws and regulations, which does not accept forced labour or child labour and will work towards the realization of harmony between work and personal lives, and strive to create a fair and lively workplace where employees can share a sense of accomplishment and joy.

Based on the spirit of "prioritizing safety and health above all else", we create a comfortable work environment that secures employees' health and safety, and strive towards the prevention of workplace accidents.

Details of Team Shimano's global 'Code of Conduct' can be obtained from its global website, 'shimano.com'.

This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, both locally within Australia & in our global operations.

And to implement steps to prevent slavery & human trafficking during the financial year of operations.

## **Mandatory Criterion 2 - Structure, Operations & Supply Chains.**

### **Structure in Australia**

All of the Australian Shimano reporting entities operate under the parent company 'Shimano Oceania Holdings Pty Ltd'.

### **Operations in Australia**

Shimano in Australia is a local sales & marketing company with a warehouse facility located in Sydney providing Shimano branded goods to all locations in Australia. Shimano does not manufacture any of its Sporting goods or products. Shimano's operations provides to the Australian market a diverse range of Fishing & Bicycle related products that caters for all types of user levels.

### **Our Overseas 'Product Supply Chains'.**

The overseas supply chain that provides goods to the Australian market is varied & complex coming from a number of locations. The products acquired from Shimano Australia's global affiliates range from a number of locations throughout the world. The procurement of the material needed to make the products is sourced through-out the world including; Asia, Europe & the US. Specifically Shimano Oceania Holdings imports the Fishing & Bicycle related products from Shimano Global' companies. Shimano Inc, located in Japan is Shimano's global Head Office for its operations. Shimano Australia Fishing sources some fishing tackle from Local or Overseas vendors that have met Shimano Global Standards.

### **Our Local 'Operations Supply Chains'.**

Generally, our local suppliers & service providers provide services such as;

- \* Professional Services & Administrative Support.
- \* Sales & Marketing.
- \* Logistics services.
- \* Information Technology Services & Support.
- \* Facilities Management.

Locally, Shimano Oceania Holding's suppliers are subject to the same Workplace & Employment Laws & regulatory requirements, Including abiding by all minimal award payment and conditions.

We establish a relationship of trust & integrity with all our suppliers, which is built upon mutually beneficial factors.

Our supplier selection & on- boarding procedures includes due diligence of the suppliers reputation, respect & compliance with the local law, compliance with health, safety & environmental standards & regulations.

If Shimano is made aware of any allegations of human trafficking/ slavery activities against any of its suppliers, procedures are in place, for immediate action against the supplier & report it to the authorities.

**Mandatory Criterion 3 - Describe the Risks of Modern Slavery Practices in the Operations & Supply Chains of the Reporting entities & any Entities the Reporting entity owns or controls.**

**Risk Assessment**

Shimano Oceania Holdings continually conducts risk assessments in its Supply Chain.

To help in the evaluation of the risks Shimano looks at specific known risk factors as outlined in the Australian Government Guidance.

This guidance is consistent with the UN Guiding Principles on Business & Human Rights.

Shimano Oceania Holdings locally takes into account;

- \* The business services rendered by our suppliers.
- \* The presence of vulnerable demographic groups.
- \* Analysis & insights of labour & human rights groups.

Shimano Oceania Holdings within its Global Supply Chain will continually apply the follow risk factors in its global suppliers;

- \* Product Sector & Industry risks.
- \* Geographic location with understanding of the 'Global Slavery Index'.

**Mandatory Criterion 4 - Actions taken to assess & Address Modern slavery & human trafficking risks, including due diligence & remediation processes.**

**Policies;**

Shimano Oceania Holdings operates the following policies for identifying & preventing slavery & human trafficking in our operations;

- \* Ongoing training of employees on appropriate business undertakings and processes on new vetting suppliers
- \* Whistleblowing Policy - we encourage all employees, customers & suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.  
We provide a confidential helpline to protect the identity of whistle-blowers.
- \* Shimano Global Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions & behaviour expected of them when representing the business.  
We strive to maintain the highest standards of employee conduct & ethical behaviour when operating abroad & managing our supply chain.

**Supplier Due Diligence**

Shimano Oceania Holdings conducts due diligence on all new suppliers during on boarding & on existing suppliers at regular intervals.

Also at a global level due diligence is undertaken in a similar framework for on boarding & on existing suppliers.

This includes;

- \* Assessing risks in the provision of particular services.
- \* Acknowledging the position of the suppliers & their Health & safety Standards, labour relations & employee contracts.
- \* Communication where necessary for improvements to sub-standard employment practices.
- \* Corrective action to Suppliers that fail to improve their performance in line with our requirements.
- \* Shimano requires all suppliers to attest/ affirm that;
  - \* They don't use any form of forced, compulsory or forced labour.
  - \* Their employees work voluntarily & are entitled to leave work.
  - \* They profile each employee with an employment contract that contains a reasonable notice period for terminating their employment.
  - \* They don't require employees to post a deposit/ bond & don't withhold their salaries for any reasons.
  - \* They don't require employees to surrender their passports or work permits as a condition of employment.

## **Mandatory Criterion 5 - How Shimano Assesses the effectiveness of its actions to address the risks.**

### **Measuring how we're performing**

Shimano Oceania Holdings has identified a set of key performance indicators & controls to combat modern slavery & human trafficking in our organisation & supply chain. These include;

- \* How many employees have completed awareness training & have access company handbook resource ?.
- \* Awareness if our suppliers have rolled out an awareness & training programme that is equivalent to ours ?.
- \* How many reports have been made by our employees that indicate their awareness of & sensitivity to ethical issues ?.

## **Mandatory Criterion 6 - Shimano's process of Consultation.**

### **Awareness**

Shimano Oceania Holdings has raised awareness of modern slavery issues in various ways outlined in the Global Shimano Code of conduct'.

By outlining in our Staff Handbook & website appropriate behaviour & risks that will help in Shimano's;

- \* Commitment in the fight against modern slavery.
- \* Red flags for potential cases of slavery or human trafficking.
- \* How employees should report suspicions of modern slavery.

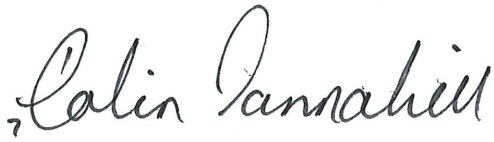
### **Training**

In addition to the awareness programme, Shimano Oceania Holdings has engaged staff in various e-learning courses & group training & resource access such as the staff handbook that at times contains context that raises awareness to limit the risk of enforced labour occurring such as;

- \* Various forms of modern Slavery in which people can be held & exploited
  - \* The size of the problem & the risk to Shimano Oceania Holdings
  - \* How employees can identify the signs of slavery & human trafficking, including unrealistically low prices.
  - \* How employees should respond if they suspect slavery or human trafficking.
  - \* How suppliers can escalate potential slavery & human trafficking issues to the relevant people within their own organisation.
  - \* What terms & guidance should be provided to suppliers in relation to slavery policies & controls.
  - \* What steps Shimano Oceania will take if a supplier fails to implement anti-slavery policies or controls
- # Acknowledgement from employees that they will abide by Shimano Oceania's staff handbook which outlines proper anti-slavery behaviour.

This Statement covers the period 1st Jan 2021 to 31st Dec 2021.

This Statement was approved by the Australian Directors of the principal governing body of Shimano Oceania Holdings located in Australia for 2021 Year period.



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**Colin Tannahill**  
Managing Director  
Shimano Oceania Holdings Pty Ltd  
Date: 26th September 2022



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**Matthew Bazzano**  
Director  
Shimano Oceania Holdings Pty Ltd  
Date: 26th September 2022