



**Modern Slavery Statement for the financial
year ending 30 September 2021**

Seeley International Pty Ltd

Table of Contents

1.0	Introduction.....	3
2.0	Reporting entity.....	3
3.0	Our Structure, Operations and Supply Chain	3
3.1	Organisational Structure and Business.....	3
3.2	Supply Chain	3
4.0	Risk Assessment	4
5.0	Our Approach	4
5.1	Policies.....	4
5.2	Implementation.....	5
6.0	Validation and Risk Management	5
7.0	Continuous Improvement	6
7.1	Our Key Actions to Date for FY21.....	6
8.0	Monitoring Effectiveness.....	6
8.1	Key Performance Indicators	6
8.2	Reporting Entities.....	6
9.0	Conclusion	7

1.0 Introduction

Seeley International Pty Ltd (Seeley) is a socially responsible company that strives to create products that are of significant benefit to our global population, and which are environmentally friendly to the planet, and to do this in a sustainable and ethical manner. It is committed to acting ethically and with integrity in all its business dealings, including with its customers, suppliers, and other third parties.

Seeley is Australia's largest air conditioning and ducted gas heating manufacturer and a global leader in developing ingenious, energy-efficient cooling and heating products.

Seeley's vision is to lead the world in creating climate control solutions which continue to be highly innovative, of premium quality and inspirational in their delivery of energy-efficiency.

2.0 Reporting entity

The reporting entity covered by this statement is Seeley International Pty Ltd (Seeley) a company incorporated under the laws of Australia with its registered office at 112 O'Sullivan Beach Road, Lonsdale, South Australia 5160.

This is Seeley's second modern slavery statement. It covers both Seeley and its wholly owned subsidiaries in Australia and overseas. It describes the risks of modern slavery in the operations and supply chains of Seeley and includes information about actions taken to address those risks for the financial year ending 30 September 2021.

3.0 Our Structure, Operations and Supply Chain

3.1 Organisational Structure and Business

Seeley's main business activities are the manufacture of climate control products in Australia and distribution of those products across Australia and the globe. With a global headquarters in Australia, over 500 employees and three manufacturing facilities, Seeley International exports to more than 100 countries around the world through its global distributor network. Together with sales offices in the USA, UK, France, Italy and South Africa, the company has delivered millions of products for installations around the globe.

Seeley has wholly owned subsidiaries in Australia and overseas. Seeley is the principal operating entity of the Seeley Group. Other significant operating entities in the Group are Design & Construct Mechanical Services Pty Ltd ("DCM") (Australia), Seeley International (Europe) Limited (the United Kingdom), and Convair Cooler Corporation (USA).

Assessed according to the Walk Free Global Slavery Index, 100% of Seeley's manufacturing and service delivery operations are in countries with low-risk potential for modern slavery and human trafficking.

3.2 Supply Chain

Seeley International has a global supply network. The execution of our everyday operations is supported by the procurement of refined and highly technical materials and electronics, as well as skilled labour and services. In 2021 Seeley International transacted with 1,640 suppliers of which, 80% of the annual spend was through 130 service providers.

Seeley undertakes the following key activities in its day-to-day operations:

- Sales and Marketing
- Customer Service and product servicing
- Australian based manufacturing
- Product design and improvement
- Research and development
- Procurement and Logistics
- Finance
- Engineering
- People and Culture
- Mechanical Construction Services (supplied by DCM)
- Business administration activities such as IT systems and networks

Our products are distributed across the globe through a well-established distribution network of agents who partner closely with Seeley in the delivery and installation of our products. We also oversee and deliver maintenance services to our customers through our own staff and trusted agents across Australia and internationally.

4.0 Risk Assessment

Our initial analysis has identified that most of our supply chain is managed through two countries, Australia and China. The remainder is spread across Europe (including Italy, Germany, the UK and Sweden), Thailand, India and the United States of America.

Seeley is aware that certain regions are more susceptible to issues associated with Modern Slavery, particularly those countries where migrant workers are more commonly used in industrial activities. The Walk Free Global Slavery Index provides information on which Seeley International has been able to undertake a high-level assessment of its supply chain, identifying potential areas of higher risk of modern slavery issues.

For example, China is now the second largest economy as well as the second largest importer in the world. Much of its rapid economic development has been the result of a domestic economy specialising in the production of labour-intensive, cheap goods for export. Forced labour sometimes occurs in the production of these goods, including in the manufacturing sectors.

Seeley will actively implement a program of seeking to educate and align suppliers from China and other moderate risk regions. We have begun doing this through sending a Modern Slavery questionnaire to all relevant suppliers, and over time, we will further implement a risk management program designed to aid the minimisation of potential modern slavery issues.

5.0 Our Approach

5.1 Policies

Seeley International's Modern Slavery Policy States that:

- A. it abhors any form of conduct or practice which would or might constitute modern slavery.
- B. it will fully comply with the Act and all legislative requirements relating to modern slavery.
- C. it has never engaged in any modern slavery practices and will never knowingly or deliberately do so.
- D. it is committed to taking reasonable steps to eradicate modern slavery, should it exist, from its supply chain.

Seeley International is committed to:

- establishing and maintaining procedures, training, policies and precautions to ensure its compliance with its modern slavery obligations under relevant legislation.
- keeping records that properly and accurately record all transactions, to be able to provide confirmation that it is not knowingly engaging with any entity involved in modern slavery; and
- taking reasonable steps to require its suppliers and subcontractors to comply with all applicable legislation relevant to the regions in which they operate.

5.2 Implementation

Our approach to the implementation of our Modern Slavery policy is progressive, enabling the company to ensure an acceptable ethical standard in all elements of our supply chain and to establish transparency in our execution of our duty of care and assurance and due diligence processes. The progressive approach will help us align our suppliers to our ethical standard, encourage open learning and create a deeper understanding of the challenge to combat modern slavery practices. Our process and performance will be continuously reviewed and improved to identify new opportunities to improve our supply chain integrity to the benefit of our customers and suppliers. As a starting point, Seeley International will engage with our key suppliers, sharing information and building understanding of Modern Slavery practices. We will encourage our suppliers to embrace and implement aligned due diligence processes to improve the management of human rights risks within the broader supply chain.

6.0 Validation and Risk Management

Seeley International will conduct an annual assessment of local suppliers to have them certify that where appropriate, they are operating in accordance with the requirements of the Modern Slavery Act and with relevant policies and procedures. This will include the review of contracts by referencing the need for our suppliers to comply with the Modern Slavery Act in our standard Terms and Conditions of Purchase and the application of a Modern Slavery questionnaire designed to help suppliers comply with the requirements of the Modern Slavery Act and help prevent the existence of modern slavery issues within Seeley's supply chain.

Future activities will also include review and monitoring of suppliers operating in higher risk regions. Applying a similar approach, Seeley will seek to do business with likeminded suppliers by providing support and education in the elements of modern slavery, implementing programs

to monitor performance against relevant local legislation and alignment with Seeley's values in this regard.

All employees of Seeley are required to undertake training in order to ensure we create and maintain a respectful and safe workplace. This includes mandatory training in the Company Code of Conduct, Workplace Bullying and Harassment and Equal Opportunity. Employees are also required to abide by our company policies and procedures to ensure all business activities are conducted in a manner in line with our ethical and moral principles.

Seeley has a Whistle-blower Protection Policy which has been established to encourage and enable concerns regarding illegal or improper practices, including modern slavery concerns, to be reported. Under the Policy reports can be made via an external whistle-blower hotline service. Reports can be made anonymously, and whistle-blowers will be protected under the Policy as required by the relevant provisions in the Corporations Act. Seeley will investigate reports and where the concerns are substantiated, take appropriate action.

7.0 Continuous Improvement

7.1 Our Key Actions to Date for FY21

- Commenced education of and discussion with Purchasing and Logistics on the risks, and identification in the supply chain, of modern slavery. Now progressed to 100% of relevant personnel having completed a Modern Slavery training module.
- Undertook a risk assessment of our exposure to modern slavery.
- Included Modern Slavery as part of our Corporate Risk Register which is regularly reviewed by Senior Management.
- Developed a Modern Slavery questionnaire for suppliers designed to (i) identify any modern slavery risks pertinent to that supplier; (ii) help suppliers comply with the requirements of the Modern Slavery Act; and (iii) help prevent the existence of modern slavery issues within Seeley's supply chain.

8.0 Monitoring Effectiveness

8.1 Key Performance Indicators

We will use key performance indicators (KPIs) to measure how effective our actions to identify and address modern slavery practices in any part of our operations and supply chains have been.

Over the reporting period, we assessed the effectiveness of our actions across three key performance areas:

- Procurement & supply chain
- HR practices, training & education
- Grievances and reporting

Against each of these focus areas we developed KPIs to assess the effectiveness of our actions. These include:

- Number of moderate risk suppliers completing our modern slavery questionnaire
- Completion rates for modern slavery awareness training
- The number of modern slavery cases identified and remediated.

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

Meanwhile, we also acknowledge that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward.

8.2 Reporting Entities

Seeley consulted the relevant companies it owns or controls in the development of this statement.

9.0 Conclusion

Seeley acknowledges how important it is to address modern slavery risks in its supply chain and take all reasonable steps to eradicate it. The steps that we have taken continue our efforts in this area. Seeley is committed to the ongoing delivery of these initiatives and working with its suppliers and other relevant parties to achieve these goals.

This statement has been reviewed and approved by the Board of Seeley International Pty Ltd.

Signed:



Jon Seeley
Group Managing Director
Seeley International Pty Ltd

Date: 25 March 2022

