



Modern Slavery

Modern Slavery Statement for
Australia/New Zealand (ANZ)



PROCESS DOCUMENT INFORMATION

Current Information

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Compiled by: Nicole Rindal, Customer Advocacy & Compliance Director, ANZ
Approved by: Belkin Limited Board of Directors

Document History

Name	Date	Revision	Notes
Ernie Roberts, Snr Manager Sustainability	August 2019	1.0	Initial Document
Stella Chang, Associate General Counsel	February 2021	1.1	Updated document in line with reporting requirements for Modern Slavery Register.
Nicole Rindal, Compliance Director/Company Secretary	25 June 2021	CPL012	Updated document control number. Approved by the Board of Directors for ANZ.



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PURPOSE & SCOPE

This statement is given to identify the steps Belkin Limited has taken to ensure slavery and human trafficking does not form part of our supply chains or anywhere within our business.

DOCUMENT OWNER

This document is owned by the Belkin Limited Board of Directors. Any questions should be discussed with the Managing Director or Compliance Director, ANZ.

REVIEW DATE

This Statement will be reviewed, and any updates made on or by 30 June 2021, and annually thereafter.

MODERN SLAVERY STATEMENT

This Modern Slavery Statement (“Statement”) is made in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) and covers fiscal year ending 31 December 2020. The purpose of this Statement is to identify the steps we have taken to ensure slavery and human trafficking does not form part of our supply chains or anywhere within our business.

This Modern Slavery Statement has been reviewed and approved by the Board of Directors of Belkin Limited on Friday 25 June 2021.

1. REPORTING ENTITY

Belkin Limited (“Belkin Australia”), a company limited by shares registered and incorporated in New South Wales, was established in December 2000 and serves as the base of operation for Belkin Group in Australia. Belkin Australia’s registered office is located at Suite 11, 14 Pioneer Avenue, Tuggerah NSW 2259.

As of 31 December 2020, Belkin Limited had a total of 42 employees.

2. STRUCTURE, OPERATIONS AND SUPPLY CHAINS

2.1 STRUCTURE

Belkin Limited is a company wholly owned by Belkin International, Inc. of United States of America.

Belkin Limited’s parent company, Belkin International, Inc., of 12045E Waterfront Drive, Playa Vista, California USA, (“Belkin USA”) designs, develops, manufacturers, markets and sells consumer electronics and networking devices and peripherals. Belkin USA is ultimately owned by Foxconn Interconnect Technology.



2.2 OPERATIONS

The principal activities of Belkin Limited consist of importing, distributing, marketing, selling, as well as providing before and after-sales services and support to consumers of consumer electronics and accessories, networking devices and peripherals.

The following operations were carried out by Belkin Limited in the fiscal year ending 31 December 2020:

Operation Type	Description of Activities
Purchase of Goods for Resale	<ul style="list-style-type: none">• Procurement of goods from Belkin Group.
Product Labelling and Packaging	<ul style="list-style-type: none">• Printing special label stickers• Rework packaging within our 3rd Party Distribution Centre
Warehousing	<ul style="list-style-type: none">• Storage and distribution of all Belkin Group Product• Management of returned products in line with Sustainability goals
Distribution and Delivery to Customers (including resellers, retailers, and end-user consumers)	<ul style="list-style-type: none">• Distribution of all Belkin products to channel partners and end-user purchasers.• Management of all customer orders placed for Belkin Products.
After-Sales Services	<ul style="list-style-type: none">• Provide customer service escalations support to channel partners and consumers.• Provide Sales Operations Support to channel partners.
Sales and Marketing	<ul style="list-style-type: none">• Create and distribute all brand marketing materials for channel partners and consumers including advertising campaigns, point-of-sale, PR, social, merchandise, web and digital & ecommerce elements.• Management of internal and external communication vehicles, web content, advertising (channel & end-user), social media, launch kits, Public Relations within region, including print media, television and radio.• Graphic design support for channel partners including packaging design creation.• Manage sales relationship with channel partners to ensure Belkin is represented appropriately and favorably in channel.• Sell in new product to Belkin customers and maintain legacy products in channel.



2.3 SUPPLY CHAINS

In the fiscal year ending 31 December 2020, Belkin Limited predominately worked with its main supplier, Belkin USA and/or its subsidiaries around the world, for procurement of goods for distribution and resale in Australia and New Zealand and other suppliers for business operational purposes.

Belkin USA and its group of companies (together referred to as “Belkin Group” and includes Belkin Australia) uphold highest ethical standards. These ethical standards upheld by Belkin Group play an integral part in guiding decisions and processes of its supply chain. Belkin Group partners with people and organisations that align with Belkin Group’s beliefs and standards.

With respect to the supply chains for the other types of operations and business activities undertaken by Belkin Limited in fiscal year ending 31 December 2020, Belkin Limited adopted practices to carefully and only choose the suppliers that aligned with not only its legal and contractual obligations, but also the code of conduct with respect to suppliers developed by Belkin Group. This code of conduct covers Human Rights topics such as labour, health and safety, ethics and also environment and management.

3. RISK OF MODERN SLAVERY PRACTICE IN THE OPERATIONS AND SUPPLY CHAINS

3.1 MODERN SLAVERY RISK IN BELKIN LIMITED’S OPERATION

Belkin Limited recognises the potential modern slavery risks in its operation in Australia. In its Australian operation, a portion of its workforce includes workers who are:

- the holders of temporary visa; and/or
- in the skill-based labour roles.

These are characteristics that could potentially put workers of Belkin Limited at modern slavery risk. However, all the employees are directly employed by Belkin Limited and paid in accordance with Fair Work legislation. Additionally, Belkin Limited does not offer unpaid internship or volunteer positions. Belkin Limited has developed internal guidelines and controls, in line with the applicable laws and regulations in Australia, to ensure fair work practices in its workforce and is committed to the continuous improvement of its own system and processes to eliminate any risk of modern slavery in its Australian operation. In this regard, the risk of modern slavery in Belkin Limited’s Australian operation is low.

3.2 MODERN SLAVERY RISK IN BELKIN LIMITED’S SUPPLY CHAIN

Belkin Limited acknowledges that modern slavery risks may exist within its Australian and international supply chain. In order to better understand where the likelihood of modern slavery risks sit within its supply chain, Belkin Limited maintains a strong, longstanding relationship with its suppliers. This allows Belkin Limited to leverage a deeper engagement in its supply chain to address modern slavery risk. Belkin Limited’s existing controls across its business units range from formal third party audits and vendor assessments, when



necessary, to scheduled and unscheduled ad-hoc internal audits and inspections of supplier facilities.

Belkin Limited has undertaken significant work this year to identify modern slavery risks and review its current risk management process and remains committed to continually developing its approach into the future.

4. ACTION TAKEN TO ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

Both Belkin Limited and Belkin Group do not tolerate modern slavery or human trafficking anywhere in its organisation and in its supply chain and are committed to take all necessary steps and measures to ensure the risk of modern slavery is eliminated, as far as possible.

4.1 CONDUCT OF BELKIN LIMITED

The Employee Code of Conduct of Belkin Group governs the conduct of every employee in the organisation. The Employee Code of Conduct is an agreement where the employees of Belkin Group attest their compliance and confirm they carry on business with high ethical standards and in compliance with the law.

Belkin Group has set up a dedicated reporting service, Belkin Ethics Hotline, in order for employees to anonymously report any potential breaches of the Employee Code of Conduct. An employee is also able to report a concern in relation to the Employee Code of Conduct by logging on to the dedicated 'Ethics Point' system online. The Belkin Ethics Hotline and Ethics Point is overseen by the Belkin Group's Human Resources group and the Compliance group who are devoted to analyzing the facts and circumstances provided in any report submitted by an employee and carrying out a thorough investigation.

4.2 SUPPLIERS' CONDUCT

Belkin Group's firm stance on eradicating human trafficking and modern slavery is echoed in the implementation and enforcement of a certification requirement for its suppliers. Belkin Group requires suppliers to certify that any materials incorporated into Belkin products and packaging comply with applicable laws regarding modern slavery and human trafficking, child labor, health and safety, working hours, and anti-discrimination legislation in every jurisdiction the supplier is carrying on business. This certification requirement is supported and verified by Belkin Group's supplier audit process which is described below in Section 5 of this Statement, as well as the mandatory contractual obligations Belkin Group impose on Belkin Group's suppliers in the standard supplier agreements.

5. HOW BELKIN GROUP ASSESSES THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS



5.1 DUE DILIGENCE AND RISK ASSESSMENT

Belkin Group is extremely careful when taking on a new supplier. Belkin Group will carry out thorough due diligence to ensure the potential supplier conforms to the Supplier Social Accountability Audit Checklist (SSAAC). Belkin Group's stringent audits are performed by Belkin Group's internal staff. In addition, Belkin Group is now part of the Responsible Business Alliance (RBA) as its parent company Foxconn is a member. In compliance with the RBA, Belkin Group has also incorporated third party agency audits. The results of the due diligence efforts are then further scrutinized by Belkin Group's compliance and on-boarding teams who make a determination as to whether the potential supplier conforms to the requirements of Belkin Group.

All new suppliers are carefully vetted by Belkin Group's respective teams in order to become an approved Belkin Group vendor. The procurement team of Belkin Group looks at price, capacity and capability, and has a Supplier Quality Assurance team that evaluates the quality processes to make sure the supplier is aligned with Belkin Group's high-quality standards. Furthermore, Belkin Group has environmental and social accountability standards that include identification of any risk of human trafficking or modern slavery entering its supply chain. The supplier is audited in accordance with these metrics. Based on the findings, Belkin Group can then make informed decisions to determine if the supplier is aligned with Belkin Group's principles in each respective area. If a supplier does not conform to standards and the Code of Conduct of the Belkin Group, such supplier will be rejected.

In addition to annually scheduled audits of both first and second tier suppliers and raw material suppliers, Belkin Group's internal quality, regulatory, environmental and social accountability teams complete a scorecard for the suppliers on a quarterly basis. Here issues are outlined by the respective department. Belkin Group performs social accountability audits by regularly conducting onsite inspections to assess the suppliers' practices with respect to treatment of its workers and assessing any potential risks including modern slavery and human trafficking. Belkin Group audits each supplier against the SSAAC. The content of the SSAAC is then used to create a Supplier Social Accountability Audit Report (SSAAR) in respect of each supplier. Each supplier's SSAAR report is assessed by Belkin Group's compliance experts who determines whether a supplier conforms to the requirements of Belkin Group.

As part of Belkin Group's continuous improvement program which Belkin Group follows, internally and with Belkin Group's suppliers, Belkin Group takes remedial actions if necessary when findings from the scorecards are reviewed with each supplier. Belkin Group also has a Corrective Action/Preventative Action (CAPA) procedure. Based on Belkin Group's findings from an audit, Belkin Group can deliver a CAPA to the supplier for any issue found. Depending on the severity, the corrective actions can vary from simple issues such as documentation updates, training and new procedures or more complex issues that can result in halting production and rejection of goods. Each team (quality, environmental, etc.) has the power to issue corrective actions at any point in time and prohibit the use of a supplier until the corrective actions are addressed.

Belkin Group maintains the utmost vigilance to extinguish potential risks of human trafficking and modern slavery within its supply chains and throughout its organisation. Belkin Group is committed to conducting standard and thorough due diligence processes on the suppliers and their supply chains and operations.



5.2 TRAINING

Belkin Group’s mandatory training must be completed by all employees annually and is designed to ensure all employees understand their obligations under the Employee Code of Conduct. For employees and managers who work in global supply chain roles, specific training relating to identifying and combatting the risks of modern slavery and human trafficking is provided. All the training is delivered to employees in a diverse range of mediums such as online courses, in-person meetings with management and written resources. The purpose of training is to educate the managers and employees of the Belkin Group to identify potential risks, especially during the supplier selection process.

5.3 KEY PERFORMANCE INDICATOR

Social accountability and environmental stewardship in the industry is a key priority for Belkin Group. This includes understanding the impacts of Belkin Group’s decisions and remaining accountable, mindful and responsible. Belkin Group listens to the needs of not only its customers and employees, but its suppliers as well. Since 2007, Belkin Group has maintained a whistleblower line to encourage reporting of all concerns regarding non-compliances in the workplace. All reported concerns are promptly reviewed and investigated.

Belkin Group measures the effectiveness of its high ethical standards by looking at certain key metrics. All new finished goods suppliers are audited before Belkin Group begins any work with them. New supplier training and qualification includes several topics such as worker rights, age of workers, wage of workers, safety and discrimination. Belkin Group’s internal Code of Conduct and company policies are reviewed regularly and updated as needed and then distributed to all suppliers. Supplier data is collected annually and then ranked in terms of risk profile and audit expiration dates. In addition, all suppliers of Belkin Group also have quarterly evaluations via Belkin Group’s scorecard.

In the fiscal year 2020, Belkin Group identified 67% of its supplier audits were done via a combination of 3rd party audits and/or internal audits within the last two (2) years. Both audit types include the ability for corrective actions to be identified and mitigated. The ultimate goal of Belkin Group is to have 100% of its suppliers audited via independent 3rd party auditors in the near future.

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ANZ