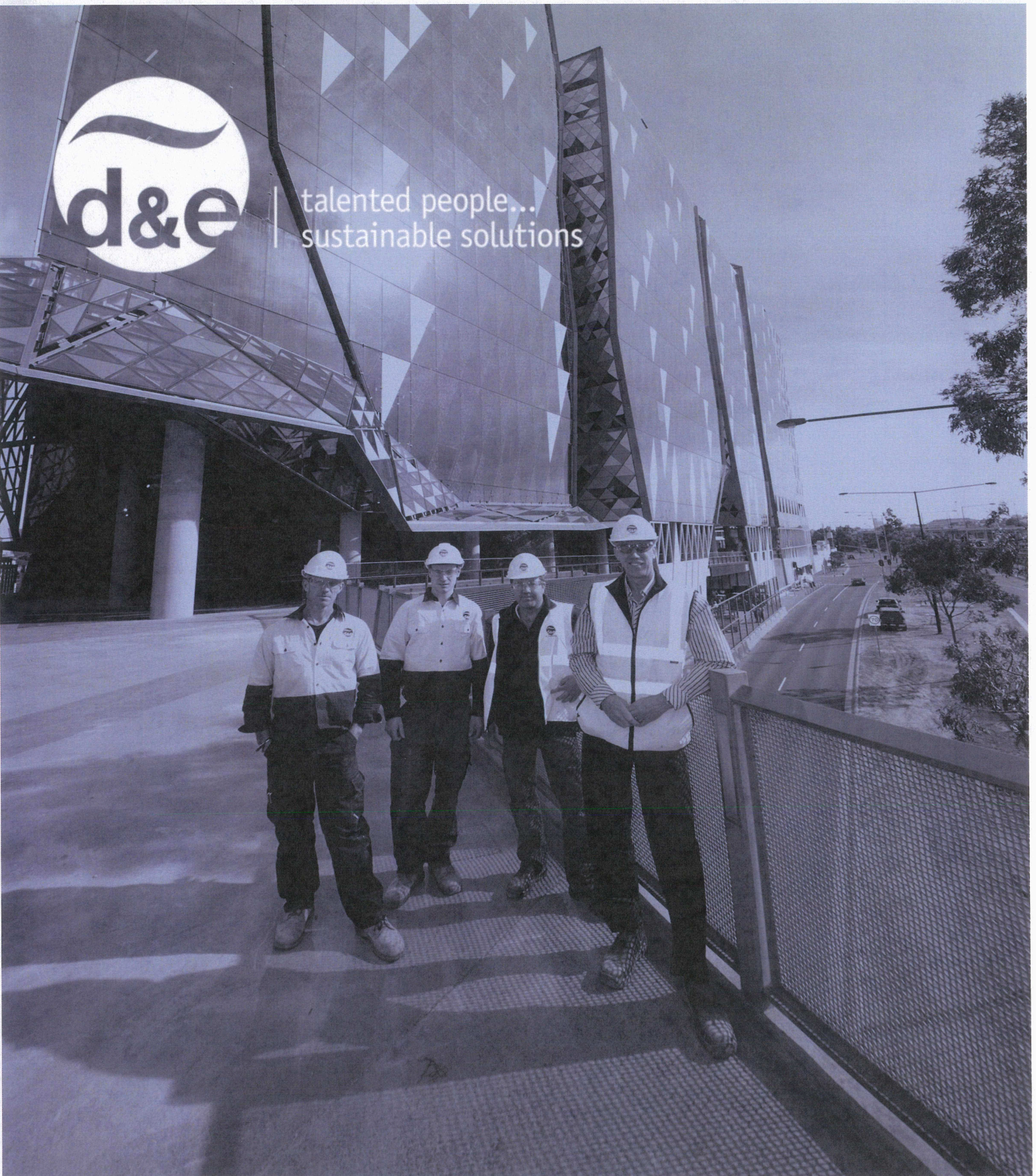




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D&E AIR CONDITIONING

Modern Slavery Statement – 2020

1. REPORTING ENTITY

This statement covers the activities of D&E Air Conditioning Pty Limited (ABN 24 158 637 979) as the Reporting Entity under the Commonwealth Modern Slavery Act 2018.

For the Reporting Period 1st July 2019 – 30th June 2020

2. INTRODUCTION

Modern slavery covers all types of slavery and servitude, including forced or compulsory labour, debt bondage, indentured servitude, forced marriage, child labour.

Modern slavery and human trafficking are global problems involving grave human rights abuses for victims and can occur in the operations or supply chains of any organisation, regardless of the industry or sector.

Addressing modern slavery and human trafficking is a human rights issue and as part of our corporate values, D&E Air Conditioning Pty Limited are committed to protecting human rights in everything that we do - within our own business and within our broader supply chain.

Our inaugural statement is made pursuant to the reporting requirements of the Commonwealth Modern Slavery Act 2018 and covers the Financial Year 2019/2020.

3. OUR BUSINESS

D&E Air Conditioning are a privately owned mechanical services company operating since 1989. We have been providing unequalled air conditioning and mechanical services within Australia, across a wide range of industries and project sizes ranging from the largest hospital and shopping centre through to the smallest office ducting modification. We have become specialists in installations for the pharmaceutical industry, hospital, and laboratory environments.

Our services include complete system design, engineering, installation, commissioning, and optimised maintenance for:

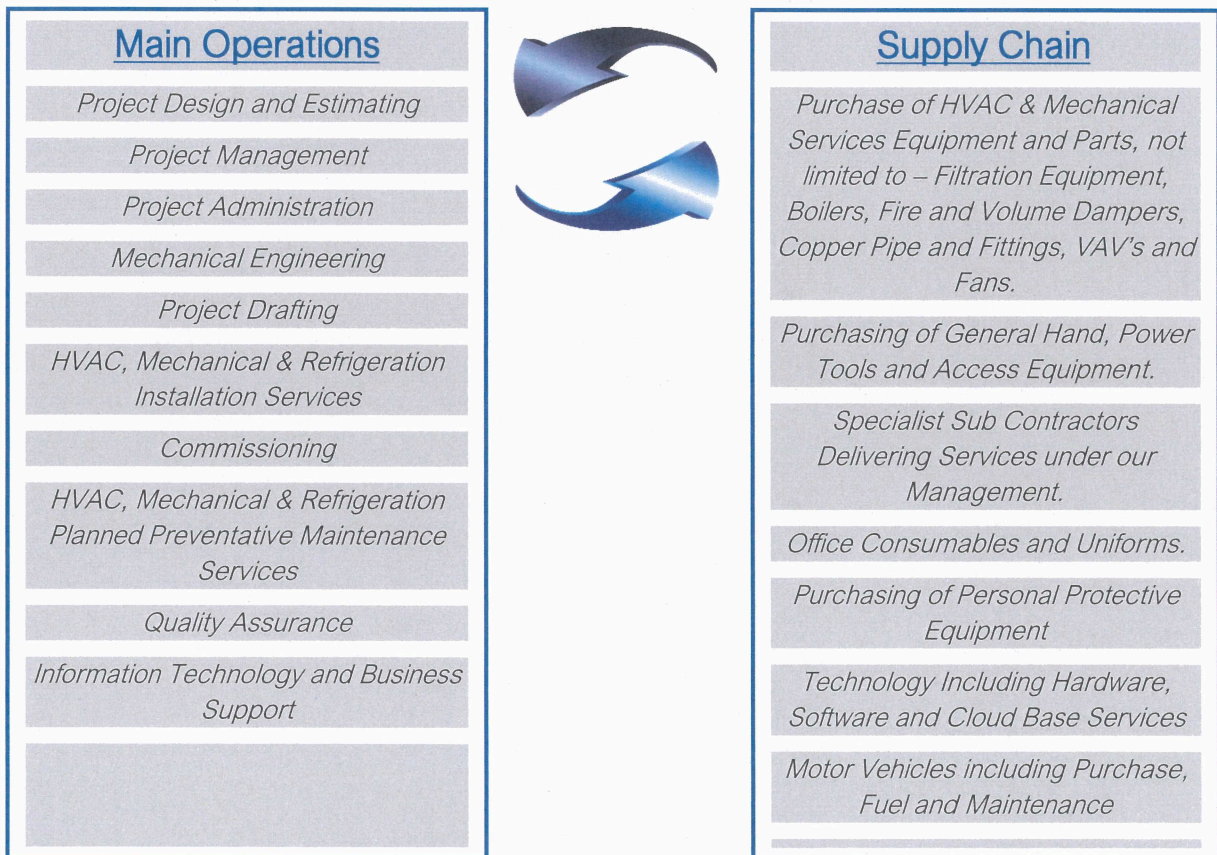
- Sustainable HVAC solutions for all building types
- Building Management Systems (BMS)
- Industrial ventilation installations
- Dust control and exhaust installations
- Industrial process piping
- Sheet metal and steel fabrication
- Laboratory and clean room systems
- Ferrous and non-ferrous piping installation

D&E celebrated our milestone 30 Year Anniversary in 2019. We are proud to have a big history and a bright future.

OUR OPERATIONS AND SUPPLY CHAINS

D&E have more than 500 employees across Victoria, Western Australia, South Australia, New South Wales, and Queensland and over 1,000 suppliers (both direct and indirect) across our operating states.

For the purposes of this statement, our key operating entities and operations associated with our supply chains are as follows:



4. POTENTIAL RISKS

In 2020, Our Modern Slavery Working Group undertook a review of potential modern slavery risks across our operations and supply chains based on company expenditure.

D&E recognises and acknowledges that the construction industry may be vulnerable to modern slavery practices because of the complex and multi-layered supply chains and the involvement of an extensive number of businesses and trades involved in delivering a project.

D&E have deemed the following have no or minimal risks

- Direct employment of workforce
- Our engagement with professional labour hire companies
- Our subcontractors

Of our initial review of suppliers, based on our highest annual spend include specialised sub-contractors, suppliers of heating and ventilation equipment and suppliers of HVAC components.

Materials and parts are produced and manufactured primarily within Australia. Other countries our suppliers import products include United States of America, United Kingdom, China, Malaysia, Taiwan, Italy, France Germany, Spain, and Thailand.

These products may potentially contain components that have present a modern slavery risk.

We intend to continually engage our suppliers, working with them to assist their transparency efforts to ensure we address not only our legislative requirements, but also our moral and ethical obligations to prevent modern slavery.

5. MODERN SLAVERY RISK MANAGEMENT

OUR ACTIONS

As this is D&E Air Conditioning first reporting period for Modern Slavery, our focus was predominantly based on awareness and education.

To facilitate this, we developed a Modern Slavery Working Group who are responsible for identifying & implementing processes improvements & compliance.

The Working Group comprises of the following roles.

- National General Manager
- National Operations Manager
- Business Development Manager - WA
- Quality & Safety Compliance Manager - VIC
- National Training Coordinator

Key actions undertaken FY19/20 include

- Internal high level action plan identifying key focus areas and deliverables for the next 2 years to support continuous improvement.
- Identify areas where D&E may be at Risk of Modern Slavery through Operations and Supply chain
- Modern Slavery Education for Working Group.
- Development of Anti-Modern Slavery and Human Trafficking Policy.

D&E Air Conditioning will investigate all good faith reports relating to actual or potential breaches of modern slavery, and address breaches whenever and wherever they occur.

If we become aware of modern slavery or human trafficking in our business or supply chain, we will prioritise the welfare and safety of workers. Wherever possible, we will work to remedy breaches and mitigate risks.

D&E Air Conditioning expects its suppliers and subcontractors to share our commitment to protecting human rights.

6. PERFORMANCE INDICATORS

Throughout FY2021, we will adopt many of the initiatives set out in our Action Plan to strengthen our controls, improve transparency and collaboration with suppliers where to further address modern slavery risk.

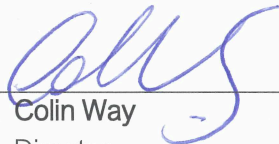
D&E appreciate that this is an ongoing commitment to address Modern Slavery in its operations and supply chains and to continually review and improve our initiatives, process, and practices.

7. APPROVAL

This statement was approved by D&E Air Conditioning Board of Directors on Monday 29th March 2021.



Greg Andrews
Director



Colin Way
Director



Brad Alexander
Director