

Modern Slavery Statement 2022

This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by the reporting entity Oliver J Nilsen (Australia) Limited and its subsidiaries to address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 30 June 2022.

1. Our Structure, Operations and Supply Chains

The Nilsen Group of Companies comprises of the parent company being Oliver J Nilsen (Australia) Limited and its subsidiary companies operating throughout Australia as detailed in Appendix 1 Organisation Chart.

The Nilsen Group of Companies operate in the electro-technology markets, specifically the supply, installation, maintenance, service and manufacture of switchboards to the Electrical, Communication and Data fields in the domestic market.

Our workforce consists of more than 1,000 employees and contractors across Australia. Our direct employees are engaged by common law contract or under the terms and conditions of the applicable enterprise agreement. The conditions of employment provided to our employees include provision for and are compliant with the minimum entitlements set out in the National Employment Standards (NES) contained in the Fair Work Act 2009 (Cth).

The Nilsen Group of Companies sources varied quantities of goods and services, ranging from stationery to electrical and data cable and associated products, consultants and contractors delivering specialised services, major infrastructure support products from batteries to generators. In F22, the group worked with 3,500 suppliers, with the majority of our \$200m annual spend primarily located in Australia.

2. Modern Slavery Risks

The Nilsen Group operates extensively in the Australian domestic markets with the majority of its products and services procured from predominately Australian registered and geographically located Companies. The lines of supply from these Companies may extend beyond our national borders and pose a risk in regards to the Group's objective in eradicating all of the risks modern slavery and human trafficking in its supply chain.

The Nilsen Group may unknowingly contribute to elements of modern slavery by virtue of:

- Components selected for the production of purchased products in Australia that have used exploited labour in that imported component;
- Products being assembled and or packaged in locations that are known to be at risk of using workers that are being exploited; and
- Foreign owned Australian Companies effectively turning a blind eye to the practices of modern slavery and human trafficking.



3. Actions and Measured Effectiveness

Due to conflicting business priorities and the ongoing effects of the pandemic, the reporting entity has not progressed any further with the actions that we aimed to achieve in F22.

In F23, the reporting entity aims to refocus its efforts to address its modern slavery risks and continue to refine its approach, with the following actions to be undertaken:

- Continue to engage with and educate our senior management team and new managers on modern slavery reporting and compliance with the Act.
 - As part of the roll out of our Learning and Development platform ELMO, a learning module on Modern Slavery is being formulated and all employees will be required to undertake this.
- Conduct a risk assessment to determine which parts of the business and supply chains are at most risk. Our progress to date with this action:
 - We are working towards selecting and engaging with key national suppliers and developing a framework for risk assessments.
- Continue to review our documentation and processes for tenders and managing suppliers to ensure compliance with the Modern Slavery Act and the Nilsen Group Policy. Our progress to date with this action:
 - We continue to develop our procurement systems and contract documentation to support the modern slavery reporting requirements
 - A reference document for Managers is near completion and will be used when responding to Tenders and Questionnaires.
 - Our supplier Terms and Conditions (incorporating Modern Slavery reporting requirements) have been updated and are currently under review.

Nilsen's overall approach to Modern Slavery compliance continues to be under development and it is proposed that it will encompass the key areas of Supplier Engagement, Risk Assessment, Education/Training and Systems Development.

The Reporting Entity will undertake the following to assess the effectiveness of the actions listed above:

- Review the progress and processes of each outlined deliverable;
- Report any deficiencies in the undertakings given and implement a corrective action plan for continuous improvement;
- Seek feedback from each reporting entity and Executive on the effectiveness of the changes implemented and compliance within our supply chain networks.

4. Process of Consultation

The Reporting Entity collaborates with its Subsidiaries formally through twice-yearly Subsidiary Board meetings and will seek clarification and feedback on any Modern Slavery risks at the local level.

It will also disseminate the Nilsen Group’s Modern Slavery Statement and Policy through various channels that are currently available for Company communication. These will typically be through the Intranet, Internet, management communique and notice boards.

The Board also actively advises all reporting entities, from time to time, any changes that may have been activated by Legislation and or the Board through its Subsidiary Board Meetings.

5. Responsibility and Review

The Directors and Executive members are charged with the responsibility of the delivery and compliance of the legal and ethical obligations of any Nilsen Policy which are reviewed on an annual basis thereby ensuring they remain relevant and updated.

This Modern Slavery Statement has been reviewed and approved by the reporting entity’s Board.



Mark Nilsen
 Executive Chairman
 December 2022

APPENDIX 1: ORGANISATION CHART

