



Modern Slavery Statement 2023

Rinnai



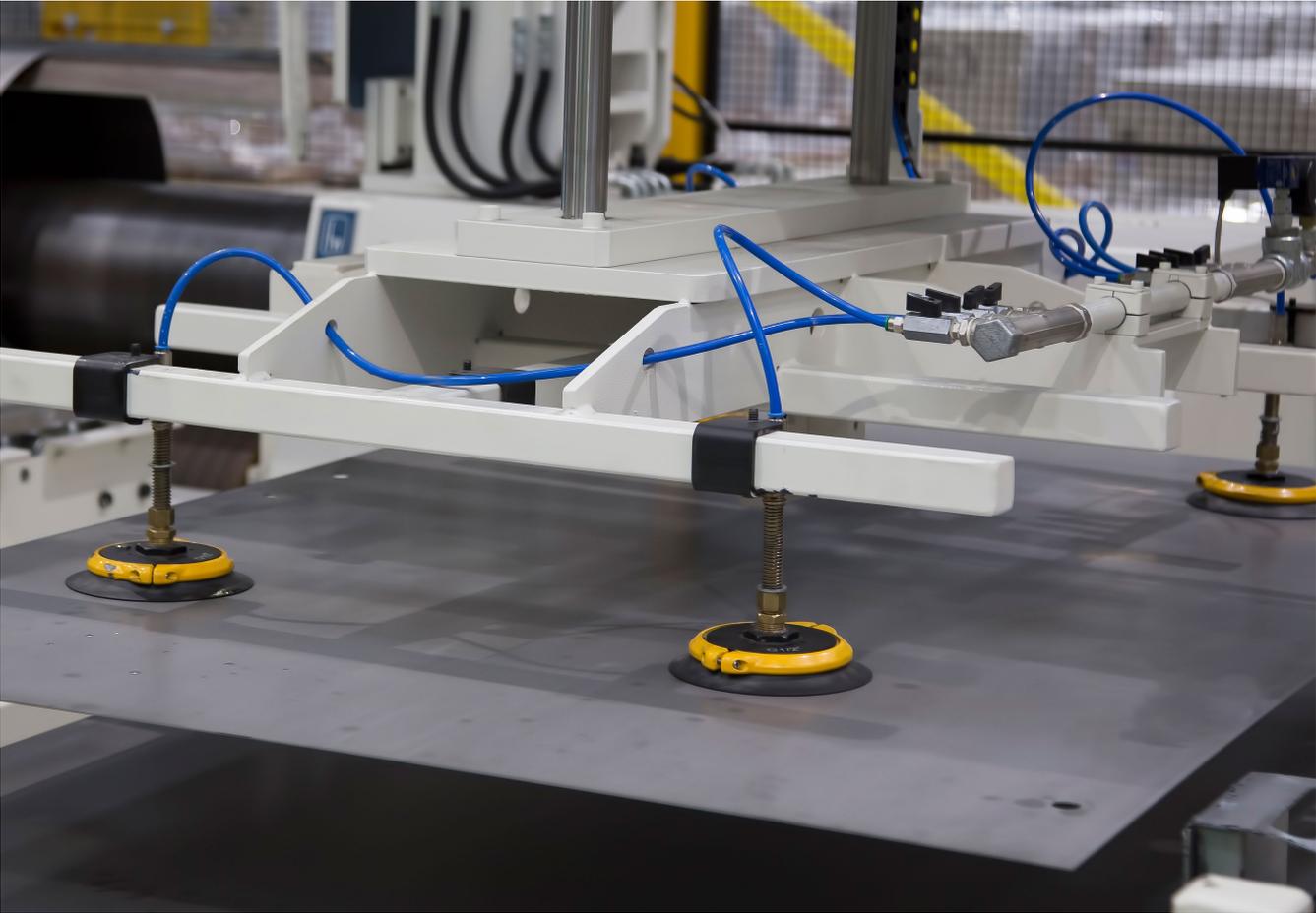
Our Commitment

Rinnai Australia Pty Ltd (Rinnai) together with its subsidiaries (the RA Group) oppose modern slavery in all forms and is committed to mitigating the risk of modern slavery occurring within its business operations and supply chain. This statement seeks to outline the initiatives taken by the RA Group to meet its commitment in this regard during the financial year ending 31 December 2022 (Reporting Year).

Reporting entity

This statement is provided for the RA Group, consisting of the following entities:

- | | |
|-----------------------------------------------------------------------|--------------------------|
| • Rinnai Australia Pty Ltd | ACN 005 138 769 |
| • Gas Appliance Services Pty Ltd | ACN 070 845 859 |
| • Jordans NSW Pty Ltd | ACN 103 872 313 |
| • Mills Road Property Trust | ACN 134 796 754 |
| • Malcolm Road Property Trust | ACN 291 008 749 |
| • Rinnai Manufacturing Malaysia Sdn Bhd
(incorporated in Malaysia) | 201901036498 (1345828-P) |





The Rinnai way

Our structure, operations and supply chain

Rinnai is a wholly-owned subsidiary of Rinnai Corporation, a listed company based in Nagoya, Japan, with a primary business of manufacturing, importing and distributing hot water, heating, cooling and commercial appliances.

Rinnai has a world-class manufacturing facility in Victoria, supported by a large national sales and distribution network. This business has become a 'centre of excellence' in specific technologies for Rinnai Corporation globally and engages significant R&D and product development activity on behalf of other Rinnai entities across the world.

Our products extend across a broad category base, covering hot water, heating and cooling systems for single rooms, whole house and commercial buildings, renewable energy systems including heat pump, solar, geothermal and photoelectric appliances for renewable energy hot water and heating/cooling applications, gas log fires and other home comfort appliances.

Rinnai has built a number of iconic product brands including Rinnai Infinity, Hotflo, Equinox, Bravis Wombat, Buffalo, Energysaver, APAC and a variety of solar and commercial brands, which have become household names in Australia and in foreign markets to which Rinnai exports.

Rinnai employs over 500 staff across Australia, administered by its head office in Victoria. We are committed to conducting our business with the utmost integrity and ethical values, in accordance with relevant laws across the world. We expect our suppliers to conduct their respective businesses with the same values and principles we uphold.

Our supply chain is wide and diverse, with many products, components and parts being sourced from overseas. We engage the services of contractors and subcontractors, including workers through labour hire agencies. We expect all our suppliers to respect and protect the human rights of their employees and provide humane working conditions.



Modern slavery risk assessment and due diligence

Rinnai's policy against modern slavery (Anti-Slavery Policy), sets out clear objectives, initiatives and expectations of our employees and suppliers, and the manner in which any identified or suspected risks of modern slavery will be managed.

We have conducted a high-level risk assessment of our operations, and supply chain by engaging with key suppliers through a supplier communication which outlines our commitment to mitigating the risk of modern slavery. Some of our product component suppliers and manufacturers have a long international supply chain. These suppliers may have operations and supply chains that spread across countries identified by the Global Slavery Index as potentially high-risk for prevalence of modern slavery. We have also included in our risk assessment some low-spend suppliers from sectors that are considered high-risk for the prevalence of modern slavery, such as cleaning services. We request these suppliers to provide us information regarding their operations and supply chain by way of a supplier questionnaire. Some of our larger suppliers have implemented modern slavery policies and initiatives. We have reviewed their internal policy statements which evidence their commitment and alignment of the core values upheld by Rinnai in relation to modern slavery.

We have identified a few suppliers who require further information on identifying and addressing modern slavery. We will extend our assistance to these suppliers to ensure they are better equipped to mitigate the risks.

Rinnai is not aware of any instances of modern slavery in its operations. We will continue to provide our employees with resources and support necessary to avoid any instances of modern slavery, and also report any potential instances if any.

Rinnai has received a few reports of modern slavery in the supply chains of its suppliers. We intend to engage further with those suppliers to get a better understanding of the business practices and risk profile. We will assist the suppliers and impose control measures to mitigate the risks to the extent practicable.

Rinnai will continually assess and improve the modern slavery compliance framework to achieve the expected outcome.



Accountability

Accountability and effectiveness

At Rinnai, every employee is responsible for respecting human rights. We require our employees to report any concerns directly, or anonymously if preferred, without fear of retaliation or retribution. All our employees undertake mandatory training on Rinnai's code of ethics and conduct, equal opportunity, anti-discrimination harassment and workplace bullying policies. In accordance with Rinnai's Whistleblower Policy, employees can report concerns through multiple reporting channels, including line managers, General Managers, Human Resources, and Legal. We investigate all allegations regardless of the source.

Rinnai will take immediate and appropriate action to remediate and address any identified breaches of our policies.

We are working through a progressive implementation of the Anti-Slavery Policy to the broader supply chain, and we understand that some suppliers are operating in countries that are yet to introduce modern slavery legislation. We strongly encourage our key suppliers to adopt the same ethical standards followed by Rinnai and will continue to share information to build awareness and commitment in eradicating any modern slavery practices in their supply chains. We require our key suppliers to report any identified instances of modern slavery in their operations and supply chain. Rinnai will address any reported instances with the supplier by suggesting improvement measures and monitoring the progress of those measures.



Consultation

The RA Group share the same core business operations and supply chain. This joint statement has been prepared in consultation with the key business areas of the RA Group including Procurement, Manufacturing, Legal, Internal Controls and Audit, Finance and Human Resources. The Board of Directors of each of our subsidiaries are aware of this statement and have approved it.

Covid -19 Pandemic

Whilst Rinnai is not aware of any increased risk of modern slavery in its operations or supply chain due to the Covid-19 pandemic, we acknowledge that several of our suppliers have experienced changes in business operations and supply chains, with limited resources and staff to effectively identify or address modern slavery matters. We expect as the effects of the pandemic are progressively reduced, the commitment to eradicate or mitigate the risks of modern slavery will be re-established.



Next steps

We will continue to work through and build on our current initiatives to identify, assess and address modern slavery risks within our operations and supply chain. We will further engage with suppliers who are at risk and provide assistance to improve their business practices to the standards and expectations outlined in our Anti-Slavery Policy. We will build on our employee training and education program extending our basic training to all employees.

The progress of our initiatives will be reported through our annual modern slavery statement.

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the Act). This statement has been approved by the principal governing body of Rinnai Australia Pty Ltd, which is its Board of Directors, as defined and required by the Act, on 26 June 2023 and is authorised by all of its subsidiaries.

This statement is signed by a responsible member of Rinnai Australia Pty Ltd, as defined by the Act.

Lucas van Raay
Managing Director
Rinnai Australia Pty Ltd



26 June 2023



Rinnai Australia Pty Ltd

ABN 74 005 138 769

100 Atlantic Drive,
Keysborough, Victoria 3173

For further information
call 1300 555 545 or visit
rinnai.com.au

TOTAL HOME COMFORT



HOT WATER



HEATING



COOLING

Rinnai