



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023

Version Number: 03

Issue Date: 28.08.2023

TVH Modern Slavery Statement



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1. Background

Total Ventilation Hygiene Pty Ltd, does not tolerate Modern Slavery and Human Trafficking and will ensure that it takes action where possible.

2. Purpose

This Modern Slavery Statement is made pursuant to the Australian Modern Slavery Act 2018. The purpose of this statement is to outline how Total Ventilation Hygiene (TVH) will closely monitor Modern Slavery within our supply chain and any other business relationship. Total Ventilation Hygiene have set out the actions taken to address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 30 June 2023.

3. Scope

This statement applies to all staff, contractors, Suppliers and stakeholders engaged in work for TVH.

4. Definition

Modern Slavery: The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation:

1. Trafficking in persons: the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.
2. Slavery: when a person exercises powers of ownership over another.
3. Servitude: situations where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work
4. Forced marriage: situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
5. Forced labour: situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.
6. Debt bondage: situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
7. Deceptive recruiting for labour or services: situations where the victim is deceived about whether they will be exploited through a type of modern slavery.
8. Worst forms of child labour: situations where children are subjected to slavery or similar practices, including for sexual exploitation, or engaged in hazardous work which may harm their health, safety or morals, or used to produce or traffic drugs.

Supplier: an enterprise known to be capable of supplying required goods and/or services. It includes manufacturers, stockists, resellers, merchants, distributors, consultants and contractors.

Supply chains: the products and services (including labour) that contribute to Griffith University's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

“ At TVH we are committed
to making a difference. ”



5. About Total Ventilation Hygiene TVH

TVH is 100% Australian owned with over 20 year's industry experience. TVH is owned by three Directors involved in the daily management and strategic vision of the business. Our customised technology allows us to seamlessly deliver tailored technical solutions for our customers within Mechanical HVAC, HVAC Hygiene, Electrical and Fire Services across multiple sectors. Our services include asset audits, compliance, installation, maintenance, reactive work, emergency services and project/construction work. We employ over 450+ full time staff nationally across 30+ locations in Australia.

As we proceed on our journey, we are continuously enhancing our sustainability strategy by setting sustainability targets, focusing on the environment, health, safety and supply chain. Our sustainability approach focuses on three key pillars:

- Social: TVH ensure safe working conditions for our employees and creates a culture of continuous development and training. We have received triple accreditation for our system. Our employee assistance program ensures we maintain the mental health of our employees. Every year TVH actively assists in our local communities. Where possible we employ people with disability and actively seek to engage with indigenous people. Our community values are of mutually beneficial relationships and respect for each other.
- Governance: TVH offer good working and living conditions for both our employees and people around us. We aim to develop and maintain a sustainable and ethical business by ensuring we meet our financial targets and creating good governance. We are committed to providing a work environment that is free from harassment or discrimination.
- Environmental: TVH believes that we need to maintain our environment to ensure a good future for our children. We track and reports on our waste, emission and consumption of natural resources and actively work towards to reducing these.

6. Policies and Procedures

TVH does not tolerate the trafficking of persons, slavery, servitude, forced marriage, forced labour, deceptive recruiting or child labour anywhere in its business. We seek to do business with suppliers that have similar values, ethics and sustainable business practices including human rights. We have policies in place that assists in managing human rights, these include the following:

- Code of conduct
- Supplier code of conduct Pack
- Whistleblower policy
- Remuneration Policy
- Sustainability Policy
- Corporate Social Responsibility Policy
- Ethics Policy
- Antibribery and anti-corruption Policy
- Diversity and inclusion Policy
- Equal opportunity Policy
- Bullying and harassment Policy
- Domestic Violence Policy
- Reconciliation Action Plan



LETS MAKE A CHANGE:

49.6 million people live in modern slavery – in forced labour and forced marriage

Roughly a quarter of all victims of modern slavery are children

22 million people are in forced marriages. Two out of five of these people were children

Of the **27.6 million** people trapped in forced labour, **17.3 million** are in forced labour exploitation in the private economy, **6.3 million** are in commercial sexual exploitation, and nearly **4 million** are in forced labour imposed by state authorities

Source: Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, Geneva, September 2022

7. Our Risk Management and Due Diligence

In FY23, our supply chain was made up of 673 contracted suppliers totaling a spend of \$29Mil. At TVH we have a large workforce of directly employed personnel, TVH have empowered our people with a high levels of technical and analytical skills, innovative thinking and an ability to apply new technologies to deliver practical, efficient, sustainable solutions. We nurture and cultivate our organisation to supports open, honest & effective two-way communication with our people. Our suppliers constitute 29% of our revenue which ensures our personnel have the equipment and tools to perform the works required. After mapping our suppliers, we have noted that all of our suppliers are based within Australia. Based on the results TVH considers the risk of modern slavery and human trafficking in our supply chain extremely low but we recognise that we can be indirectly exposed to the risk.

TVH have taken the necessary precautions to prevent this from happening. In order to do this TVH has implemented a risk management process that ensures all new and old suppliers adhere to our supplier code of conduct policy which outlines the requirements suppliers are expected to meet to do business with TVH, including requirements in relation to labour practices and human rights. We have created a supplier pack that provides a declaration of compliance to ensure that they are conforming with the requirements of Modern Slavery, Human Trafficking and Human rights.

8. Grievance and Remediation

If an employee, subcontractor or supplier believe that there is a breach in the Modern Slavery act, the individual should report the breach to their managers and within our CRM reporting system. If they are unable to perform this task TVH has a whistleblowing Policy that allows employees to raise any concerns they may have whilst remaining anonymous. This includes reporting on any modern slavery, human rights or human trafficking concerns. All persons have the ability to voice their concerns that they may have. Where issues are investigated and substantiated, we take appropriate action.

9. Training

TVH is committed to training our employees, we complete code of conduct training that includes modules based on human rights and modern slavery. This is completed annually by every employee and provides context around our policies, our principles, values and beliefs.

We understand that we need to train our staff to identify potential occurrence of modern slavery and human trafficking and the actions required to respond appropriately. We will continually evolve our process and ensure we are delivering our best outcomes.

10. Review

This Modern Slavery Statement will be reviewed every year

11. Related Documents

Supplier code of conduct

Supplier evaluation procedure

Supplier Questionnaire

Supplier Assessment Form

Whistle-blower Policy
Diversity and Inclusion Policy
Code of Conduct
Equal Employment Opportunity Policy
Anti Bribery and Corruption Policy
Corporate Social Responsibility Policy

This statement was approved by the board of Total Ventilation Hygiene Pty Ltd in their capacity as principal governing body of Total Ventilation Hygiene Pty Ltd on 28 August, 2023.

This statement is signed by Joshua Leys in his role as the Managing Director of Total Ventilation Hygiene on 28 August, 2023.

Joshua Leys
Managing Director of Total Ventilation Hygiene Pty Ltd
28 August, 2023