



DEXION  
**MODERN SLAVERY STATEMENT**

**2023**





*Smarter thinking.*

This Modern Slavery Statement is published in accordance with Australian Modern Slavery Act 2018 (Cth) for the Dexion Group headquartered in Sydney, Australia. It covers the calendar reporting year 2023 and is a joint statement applying to Tech-Link Storage Engineering (Australia) Pty Ltd and its wholly owned subsidiary companies conducting business in Australia.

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# Regional Offices

**DEXION**  
Smarter Thinking.

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## PEOPLE'S REPUBLIC OF CHINA

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# Message from Dexion Asia Pacific Group Managing Director

Dexion believes that people are entitled to be treated fairly and with dignity. This principle drives its Ethical Sourcing Program, and the desire to identify and take action to eliminate any negative impacts on human rights associated with its operations.

Dexion promotes a culture of respect and care for the rights, freedoms, health and safety of workers in its Australian operations, and across the Group's regional manufacturing facility and businesses across Asia Pacific locations.

This culture is supported by a robust human rights framework including policies, codes of practice and protocols to promote the labour rights, worker safety and the health and wellbeing of our staff.

We have the same expectations for workers engaged by our supply chain providers of products, product components and services. This is conveyed through Dexion's Code of Ethics and implemented with our suppliers through Dexion's Ethical Sourcing program. First initiated in 2017, we are proud of our Ethical Sourcing program and the role that we have been able to play in influencing positive change for workers in our supply chain.

Dexion's Ethical Sourcing program is continually evolving. Since our last Modern Slavery Statement we have:

- updated Dexion's Code of Ethics
- progressed implementation of the Code with Dexion's tier 1 suppliers<sup>1</sup> through direct engagement and compliance assurance program
- undertaken a 'modern slavery' risk assessment of all service providers to Dexion's Australian operations. The supply chain risk assessment results have been applied to prioritise supplier engagement in our Ethical Sourcing assurance program.

Dexion's Code of Ethics reflects the intertwined nature of social and environmental challenges, and the Code includes standards reflecting environmental responsibility and sustainability. Dexion's environmental stewardship is showcased by our new manufacturing facilities in Malaysia - from the smart building design and technologies for energy efficiency, to the sustainable production processes and operations which minimises waste and environmental impact. Dexion also collaborates with suppliers to ensure sustainability throughout the supply chain.

At Dexion, we recognise the importance of addressing not only immediate challenges but also considering the long-term consequences of our actions. We are committed to pursuing social and environmental policies and actions which will guide us to a sustainable future and a world which is more balanced, responsible and resilient.



**DAMIAN CROSS**  
Group Managing Director  
Dexion Asia Pacific

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<sup>1</sup>Tier 1 suppliers are suppliers which Dexion has a direct relationship with (as opposed to Tier 2 suppliers which supply Tier 1 suppliers).

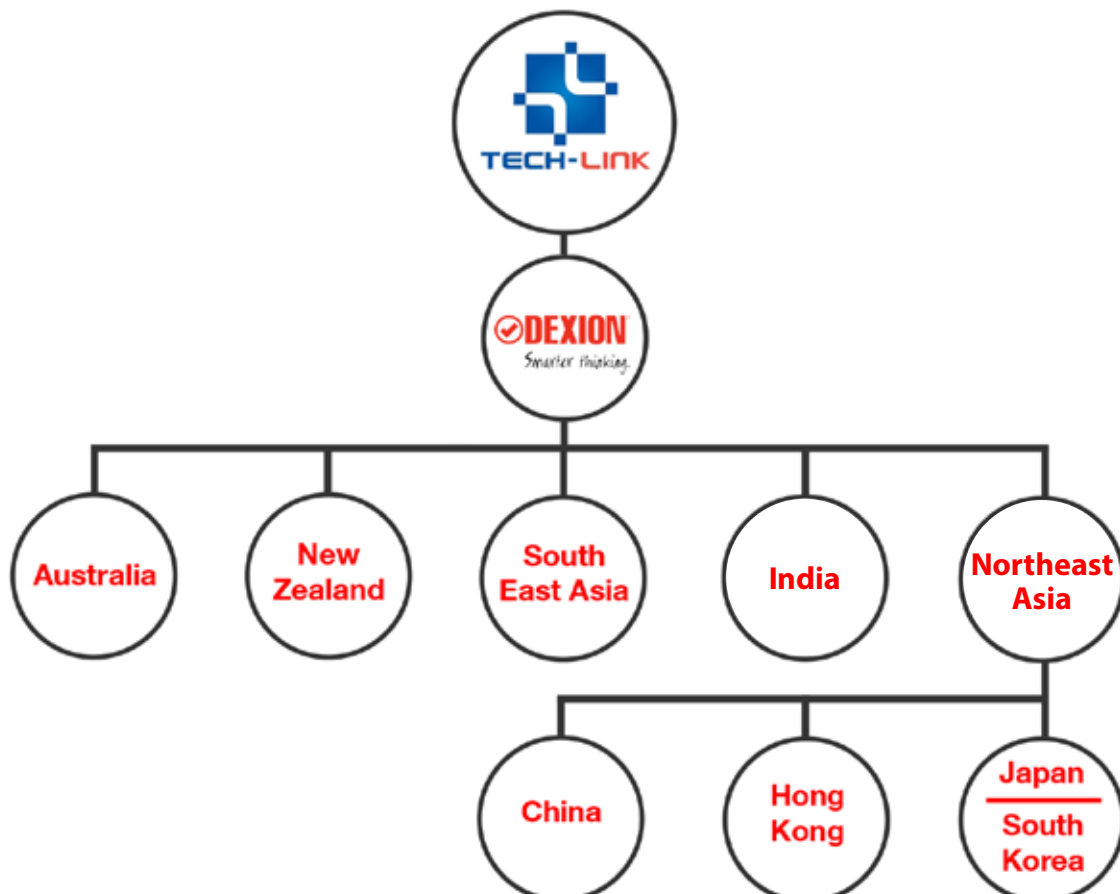
# Dexion's Corporate Structure

Tech-Link Storage Engineering (Australia) Pty Ltd owns subsidiary companies which operate in Australia, New Zealand, Malaysia, Singapore and China.

Tech-Link Storage Engineering (Australia) Pty Ltd is the parent company of the following Australian companies which operate as the Dexion Group:

- **Dexion (Australia) Pty Ltd**
- **Dexion Commercial (Australia) Pty Ltd**
- **Dexion Integrated Systems Pty Ltd**

Some of these companies, such as Dexion Asia Sdn Bhd, manufacture products and supply product components which are sold in Australia by the Dexion Group.





# About Tech-Link



## The Dexion Group was acquired in 2017 by the Tech-Link Group.

Founded in 1988 Tech-Link has progressed from an importer of storage equipment to a global storage, distribution and material handling specialist.

The Tech-Link Group is engaged in the research, design and development of logistic supply chain systems and solutions. Leveraging on this expertise Tech-Link has also successfully established extensive Built-to-Suit logistics facilities and the development of high quality industrial and logistics facilities in Asia.

The acquisition of the Dexion Group complemented Tech-Link's portfolio and has resulted in synergies and opportunities which has benefitted the group. Together with the Dexion Group, Tech-Link Group's annual turnover exceeds \$200 million.





# About Dexion



*Smarter thinking.*

**Dexion is a leading international industrial and commercial storage solutions provider with over 85 years of history.**

From the first slotted angle shelving system invented by Dexion founder Comino Demetrius in 1937, Dexion has been built on innovation and a commitment to excellence. Dexion products and services are designed to help businesses and industries around the world manage complex requirements for safe and secure storage, space optimisation and profitability.



**Demetrius Comino OBE**  
Founder of Dexion Ltd

Dexion has partnered with some of the world's most recognised companies to provide them with customised storage and materials handling solutions. Headquartered in Australia and with a team of over 250 highly skilled professionals and a presence across Australia, New Zealand and Asia, Dexion delivers seamless, integrated solutions that companies rely on to protect their investments and streamline operations.



The Dexion Group 's manufacturing and supply operations span three areas:



## Dexion Industrial Solutions

Going back to its beginnings, Dexion has been a leader in quality and reliable industrial storage and shelving solutions. With ingenuity and creativity Dexion develops smarter solutions to meet specific business needs for industrial storage and shelving, materials handling and inventory management.

Industrial racking components supplied by Dexion are subject to extensive testing for structural strength and serviceability carried out at the University of Technology, Malaysia.



Dexion Industrial products include:

- Pallet racking to suit selective or high-density rack designs with a range of accessories to protect and optimise space utilisation.
- Narrow aisle and cantilever formats to suit products of all sizes.
- Multi-purpose roller flow storage systems for pallets and cartons.
- Customised steel or rack supported raised mezzanine decks to provide uninterrupted space on the floor and above ground storage.
- Long span shelving for small parts pick and pack.

## Dexion System Solutions

Dexion System Solutions designs, develops and implements integrated automation solutions such as zone routing solutions, automated storage and retrieval solutions and goods to person solutions. It has expertise in logistics system design, software development and engineering, solution implementation and logistics operations.



Dexion Integrated Systems products include:

- Automated storage and retrieval systems
- Goods To Person systems
- Zone routing systems
- A range of specialised solutions tailored to customer needs





## Dexion Commercial

Dexion Commercial offers a range of storage solutions which are designed to help businesses improve their storage and organization, increase efficiency, and maximise their use of space. With a team of experienced professionals and a commitment to quality, Dexion Commercial has established a reputation as a reliable and trusted provider of storage solutions. Dexion Commercial's capacity to provide unique and innovative storage solutions has been boosted by its acquisition Driven Technologies which specialises in track, carriage and drive systems for Compactus®.



Dexion Commercial products include:

- Shelving
- Compactus®
- Cabinets & planter boxes
- Lockers
- Locks
- A range of specialist products for Artefacts, Art Works, Weapons and Medical consumables storage

## Our product solutions

 **DEXION** | MDS  
ASRS

 **DEXION** | HDS  
SHUTTLE

 **DEXION** | Smart Roller  
CONVEYOR

 **DEXION** | PALLET  
RACKING

 **DEXION** | WAREHOUSE  
EQUIPMENT

**compactus®**

# Dexion Supply Centres

Dexion Supply Centres are independently owned businesses which provide retail outlets for Dexion products and solutions all over Australia and New Zealand.

Dexion Supply Centres have long established relationships with Dexion, a deep understanding of Dexion products and are specialist service providers.

From commercial storage and shelving, to warehouse pallet racking and automated materials handling systems, Dexion Supply Centres offer solutions to businesses of all different sizes.



## Our Values - The Dexion Advantage

### Quality

Lifetime Warranty, Quality assured and compliant to Australian and European steel storage standards

### Experience

With over 80 years of storage and logistics expertise, we're trusted by leading companies locally and globally

### Innovation

Engineering products that embrace smarter thinking and better, safer processes

# Dexion's Ethical Sourcing Program

## Dexion's Code of Ethics

Dexion's Ethical Sourcing Program is built on its Code of Ethics. First developed in 2017, the Code defines minimum ethical and social standards to be applied in business operations.

Dexion's Code of Ethics applies to our own operations and to those of our suppliers. We recently updated our Code of Ethics to ensure that the standards were able to be measurable to improve accountability and expressly provide for freedom of association and the availability of grievance mechanisms.

Still firmly based on the respect for human and labour rights, the new Dexion Code of Ethics reflects standards sourced from International Labour Organisation Conventions prohibiting:

- Forced labour
- Financial Bonding
- Restrictions on ability to leave employment, work or housing facilities
- Child Labour
- Retention of identity documents
- Harsh or inhumane treatment

Reflecting that modern slavery is at one end of a continuum of human rights impacts, Dexion's Code of Ethics also extends to other areas of ethical, legal and socially responsible conduct including setting standards for:

- Labour practices, including compliance with legal working hours and full and proper payment of wages and benefits
- Work health and safety and empowerment of workers through freedom to associate
- Non-discriminatory and fair practices
- Environmental protections and sustainability
- Ethical business conduct, including anti-bribery and corruption

Dexion engages directly with its first-tier suppliers to secure their commitment to Dexion's Code of Ethics in a graduated and incremental way. Dexion prioritises suppliers which are assessed, through Dexion's supply chain mapping, to be located in countries with an inherently higher risk of modern slavery practices.







## Governance

The Board has high level oversight of compliance issues with international implications such as supply chain quality and including the Ethical Sourcing Program.

Dexion has specifically convened an Ethical Sourcing Group comprised of representatives across Dexion's various operations. This includes senior representatives from each of the reporting subsidiary companies conducting business in Australia, who have direct knowledge of the operations and supply chains of these companies.

The Ethical Sourcing Group's activities include supply chain mapping, supplier risk assessment, review and implementation of the Code of Ethics and investigation and addressing modern slavery issues. The Group has been guided in their activities with specialist legal and compliance support.

The Ethical Sourcing Group includes the Chief Financial Officer and reports progress to the Dexion Asia Pacific Group Managing Director.

This statement covers every company conducting business in Australia which is owned or controlled by Tech-Link Storage Engineering (Australia) Pty Ltd. Accordingly, in preparing this Statement, the Dexion Group has been able to co-ordinate and confirm the actions and reporting of each entity in relation to ethical sourcing and the identification of any modern slavery risks in their own operations and in their supply chains.

## Ethical Sourcing Program Actions

Dexion's initial engagement with suppliers in relation to compliance with the Code of Ethics was direct and facilitated by in person visits. This provided Dexion with unique opportunities to observe, identify and assist suppliers in understanding and managing any modern slavery issues in their operations. This has been particularly effective with suppliers with whom Dexion had a long standing relationship – which is the case with a majority of Dexion's suppliers.

With the travel restraints imposed during the Covid-19 pandemic, Dexion transitioned to a more formal approach of written assurance of supplier compliance with its Code of Ethics. Securing this this assurance and compliance of Dexion's tier 1 suppliers has been the primary objective for Dexion's Ethical Sourcing program.

An overview of Dexion's Ethical Sourcing Program steps is set out below:

- Self-assessments by Dexion businesses against the Code of Ethics; declarations of compliance; undertaking any required corrective actions and familiarisation of staff with the Code of Ethics
- Supply chain mapping - identifying the location of tier 1 suppliers and annual spend and other factors
- Grading suppliers from high to low based on the inherent likelihood of modern slavery risk using Dexion Risk Assessment resources and outcomes of the supply chain mapping
- Implementation of the Dexion Code of Ethics through direct assurance engagement. Dexion secures a contractual commitment by its suppliers to the Code which through a signed declaration promotes accountability, ensures that corrective actions are undertaken and also provides the means for the transparent monitoring of the suppliers' implementation and maintenance of the Code standards.

More information about actions taken to assess and address modern slavery risks in its own operations and supply chain is provided in the following section.

## Dexion's Supply Chain

Dexion has longstanding relationships with its suppliers. As a result, Dexion enjoys a relationship of mutual trust and is well positioned to influence its suppliers maintaining appropriate ethical and social standards. As anticipated by the Modern Slavery legislation, the commercial leverage arising from Dexion's supplier relationships has assisted in the widespread adoption of Dexion's Code of Ethics in its supply chain.

The Dexion Group supply chain includes companies which are either owned or commonly controlled by the Tech-Link Group. This uniquely places Dexion to have direct access to and understanding of manufacturing facility conditions and operations in sourcing of material and products.

Each Dexion business manages its own procurement needs, although there are synergies and shared suppliers across the group. Dexion has a long standing practice of requiring evidence of current certification to related ISO standards (such as ISO9001 and ISO14001). While these are for environmental and quality standards they do require the supplier to have established internal protocols to manage such issues, and as such they tend to sit at the top percentile in their industries.

## Dexion Industrial Supply Chain

With over 85% of Dexion Industrial's spend on product components being sourced from Dexion owned or related companies, it has unparalleled insights as to the working conditions and treatment of those engaged to work at its primary suppliers. This includes wholly owned Dexion companies in Malaysia, China and New Zealand, as well as companies related to Tech-Link.

Industrial Supply Chain:

- The industrial pallet racking business is primarily supported by two main factories, located in China and Malaysia, both of which are owned or related to Dexion.
- Dexion has owned and managed factories in these key strategic regional areas for close to 25 years.
- The factories source steel and small component parts from a variety of suppliers in China, Malaysia and Japan.
- The Dexion Smart Hub and regional HeadQuarters is located in Malaysia – which operates from new state of the art facilities and is also home of the Dexion Group Procurement, Manufacturing Design and Engineering teams.

## Dexion System Solutions

Dexion System Solutions secures services and sub-contracted labour from Australia, which has an inherently low risk of modern slavery practices, and its product components are also predominantly sourced from Australia. Each of these partnerships span decades resulting in an intimate understanding of these local businesses.

### Automation Supply Chain:

- The Systems Solutions division of Dexion is heavily biased toward tailored customer solutions which can result in notable year to year changes to our top suppliers by annual spend.
- In 2023 the top 10 suppliers together accounted for in excess of 74% of that annual spend.
- Within these top 10 suppliers, five have their operations based in Australia and in aggregate they accounted for approximately 50% of the annual spend.
- Other product component suppliers are from countries which also have a predominantly low risk of modern slavery - such as Austria, Germany, China and Japan.
- One of our key suppliers is a related company which is based in China.
- As a result of our regular collaboration with our suppliers to develop tailored customer solutions we have a very high level of familiarity with these suppliers and their operations.

## Dexion Commercial

Dexion Commercial works with trusted component suppliers and service providers associated with distribution, installation and servicing. Dexion Commercial's supplier relationships are very stable and it has a history of trading with these suppliers spanning close to 30 years.

### Commercial Supply Chain:

- Dexion Commercial's component suppliers are primarily located in Australia.
- Other suppliers are located in the USA, Canada, China and Vietnam, and make up the majority of Dexion Commercial's supplier spend.
- Dexion Commercial sources around 30% of its products from a related company in China.
- With Dexion's acquisition in 2021 of a former long term Australian supplier Driven Technologies, a designer, manufacturer and supplier of track, carriage and drive systems, Dexion Commercial secured full control of the Compactus supply chain.
- Dexion Commercial employs processes to ensure its products comply with the stringent demands of globally recognized environmental certifications.
- In FY 23 56% of Dexion Commercial's core group products were assessed by Bureau Veritas and certified as meeting the environmental, health and social/ethical standards of GECA (Good Environmental Choice Australia). GECA manages a type 1 Ecolabel program in accordance with ISO 14024 "Environmental Labels and Declarations" and is the owner of the Good Environmental Choice Australia Ecolabel.





■ Countries of origin of component suppliers and service providers to Dexion Asia Pacific.

## Modern Slavery Risks & Remediation

Associated with its Ethical Sourcing Program, Dexion has protocols and tools which help it to record and monitor:

- any modern slavery risks including risks caused, contributed to or directly linked to its operations (including those in its supply chain);
- how these risks are addressed including noting corrective actions identified and undertaken;
- the effectiveness of its actions.

Dexion's supply chain human rights risk assessment starts with supply chain mapping. That is, each Dexion business maps their tier 1 supplier locations. Supplier country locations are ranked from high to low for inherent slavery practices risk. To assess this risk Dexion uses resources such as the Global Slavery Index ('GSI') developed by the Minderoo Foundation's Walk Free initiative. The GSI uses prevalence estimation techniques, including nationally representative surveys, risk-model extrapolation and multiple systems estimation to measure modern slavery globally.

Overall, suppliers to the Dexion Group are primarily geographically located in countries with an inherently low risk of modern slavery according to the GSI - including Australia, New Zealand, the USA, Austria, Sweden, Japan and China.

Where Dexion's products are sourced from countries at an inherently higher risk of modern slavery Dexion prioritises these suppliers for direct engagement in the Ethical Sourcing Program. Because the Dexion Group has a manageable number of established long standing suppliers it has the opportunity to gain direct insights into modern slavery practice risks – and prompt suppliers to address these risks - which gives it an advantage over companies with large or variable numbers of suppliers.

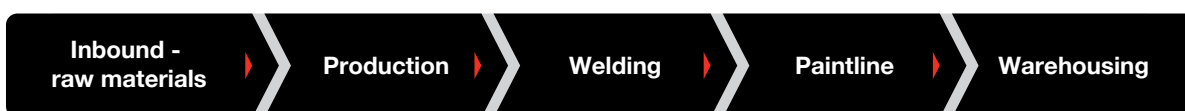
Where Dexion's own operations are located in 'high risk' countries (such as Malaysia) Dexion has the unique advantage of being able to assess such operations for any social compliance risks and take direct action to improve working conditions. In this regard, in 2023, the Malaysian Dexion facilities were independently audited by QIMA against the Sedex Members Ethical Trade Audit ('SMETA'). The most comprehensive SMETA 4 pillar audit was conducted on-site addressing both labour, health and safety issues as well as environmental and business ethics practices. The site and operational practices at the Malaysian Dexion facilities were deeply evaluated and adjustments and improvements were implemented to reach the highest of standards through a Corrective Action Plan.



## Case Study: Dexion's Malaysian Operations



Dexion has used the relocation and development of new manufacturing facilities in Malaysia to make improvements to working conditions. The state of the art premises were designed to meet a number of objectives – such as worker safety, production efficiency, reduced energy consumption, minimum waste and safe management of emissions. The facility was designed to ensure a clear one-directional process flow from inbound of raw materials to outbound goods. This introduces efficiencies in movement of people and materials, and minimises the risk of accident and collision. While injury counts were already relatively low, there has been a marked decrease in injuries and near misses since these changes were implemented.



Dexion has engaged a Facility Manager to oversee, monitor and manage the buildings and to be responsible for support services to ensure the working environment is safe, hygienic and properly maintained.

The Malaysian office of Dexion employs around 100 workers. Human rights issues prevalent in Malaysia include debt bondage and forced labour - especially amongst migrant workers. Accordingly, Dexion's Malaysian factory is meticulous in its hiring practices.



It does not use agencies for labour, but instead engages in the direct hiring of staff. This means there is no risk of third parties engaging in debt bondage, compromising the entitlements of workers by charging placement fees, or of workers being misled as to their role, rights or remuneration.

A very high proportion of Dexion's staff in Malaysia are sourced from local labour. This is a deliberate policy undertaken by Dexion to both support the local Malaysian community and to actively mitigate against the risk of modern slavery which can arise with the supply chains associated with migrant labour.

Dexion complies with legal wage and labour requirements (such as overtime) and in many instances the allowances and benefits to staff exceed those mandated by law. Dexion has also introduced opportunities for flexible working hours and working from home initiatives. Dexion's investment in the wellbeing of its staff is also evident from its vocational training programs, its many social activities and sports tournaments. Even its perimeter landscaping of the Malaysian facilities to reduce stress and improve the sense of well-being of its workers within an industrial environment.

## Grievance Mechanisms

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All Dexion workers are encouraged to report to People & Culture any breaches of Dexion's Code of Conduct and policies, including those against bullying, harassment, and discrimination. Workers at Dexion's Malaysian operations have the opportunity to anonymously submit complaints and raise issues for managerial consideration.

Dexion has partnered with AccessEAP (a leading Australian employee assistance provider) to provide its workers with confidential counselling as part of its quest to promote a socially and ethically healthy workplace climate.

Dexion is committed to maintaining positive standards of ethical and socially responsible practices to minimise any negative human rights impacts of our business operations. Through publication of its Modern Slavery Statement we believe that we are contributing to raising awareness and focussing attention on these important issues.

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### Director signature

Approved and signed on behalf of the Board



**DAMIAN CROSS**  
Group Managing Director  
Dexion Asia Pacific

# Annexure

The table below outlines where information related to each of the mandatory criteria in section 16 of the Modern Slavery Act 2018 (Cth) ('the Act') can be found:

Mandatory Criteria	Page Number
(a) Identify the reporting entity.	2, 6 – 8
(b) Describe the reporting entity's structure, operations and supply chains.	9 – 11, 14 – 15
(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	16 – 18
(d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	12 – 14, 18 – 18
(e) Describe how the reporting entity assesses the effectiveness of these actions.	13 – 14
(f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	13
(g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	

(h) **Principal Governing Body Approval**

This modern slavery statement was approved by the principal governing body of Tech-Link Storage Engineering (Australia) Pty Ltd as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 20 June, 2024. [Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.]

**Signature of Responsible Member**

This modern slavery statement is signed by a responsible member of as defined by the Act. [Section 4 of the Act defines a responsible member as including an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act].