## SPL

MODERN SLAVERY STATEMENT

REPORTING PERIOD FY22/23

LINEN. DONE DIFFERENTLY.

## ACKNOWLEDGEMENT OF COUNTRY

SPL acknowledges the Traditional Custodians of the land on which we live, work and conduct our business operations.

We acknowledge the continuing connections of Aboriginal and Torres Strait Islander Peoples to Country and community.

We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander people.

## INTRODUCTION

This Modern Slavery Statement is made on behalf of SPL Holdings (ABN 85 600 456 808) and the associated entities (listed below) collectively referred to in this Statement as 'SPL' or 'the Group'. This Statement is made for the purposes of the *Modern Slavery Act 2018 (Cth)*.

ENTITY	ABN
Specialised Linen Services (Adelaide) Pty Ltd	37 610 545 974
Specialised Linen Services (Albury) Pty Ltd	44 141 792 083
Specialised Linen Services (Brisbane) Pty Ltd	36 601 098 060
Specialised Linen Services (Cairns) Pty Ltd	45 605 037 189
Specialised Linen Services (Melbourne) Pty Ltd	87 096 726 760
Specialised Linen Services (Sydney) Pty Ltd	79 115 941 010
Specialised Linen Services (Perth) Pty Ltd	55 611 100 371

## **OUR BUSINESS**

SPL provides linen and laundry services to customers in the accommodation, healthcare and mining sectors.

SPL has grown rapidly with over 1,000 employees, 14 locations and 8 linen hubs, including the largest laundry in the Southern Hemisphere and a vision to become a world class provider through innovation. SPL seek to not only serve our customers but create new industry solutions by investing in technology to help manage linen circulation and spend, using the smallest carbon footprint possible.

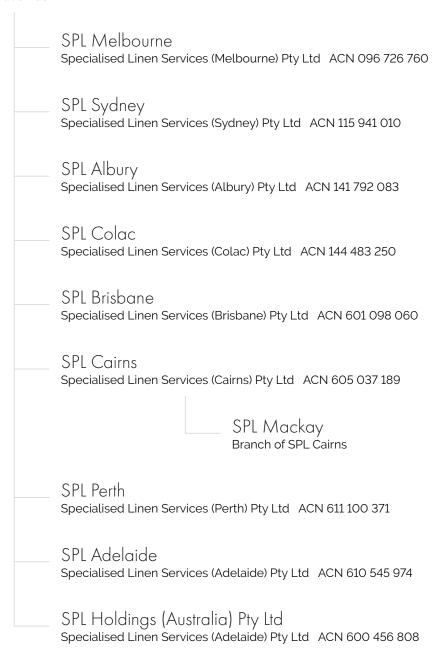


## **OUR STRUCTURE**

The corporate structure of the SPL Group operating entities is shown below:

#### SPL GROUP HOLDINGS PTY LTD

ACN 628 086 466



**OUR WORKFORCE** AT 30 JUNE 2023:

518 508 451 21 555
FEMALE MALE CASUAL PART TIME FULL TIME

## THE RISK OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

We recognise the vulnerability of many of our employees who have English as a second language and are often first generation citizens of our country.

The assessment of modern slavery as a risk within our Australian operation and local procurement is low. However, our focus remains high on our use of labour hire and our international linen supply chain.

International linen suppliers are of particular focus given the countries where these items are generally manufactured are recognised as being of potentially high risk. Our commitment to linen sourcing is to use only suppliers known to have in place strong governance systems for ensuring modern slavery compliance and to review the effectiveness of these systems.

SPL understands that it has direct relationships with first-tier suppliers and that those direct suppliers may in turn have relationships with second-tier suppliers, which need to be considered also.

The following map and table identify the countries that SPL source goods from and the Modern Slavery Risk attached to each country.

COUNTRY	VULNERABILITY	PREVALENCE	RISK
North America	25	3.3	Low
Poland	19	5.5	Low
Pakistan	80	10.6	Medium
India	56	8.0	Medium
Bangladesh	58	7.1	Medium
Hong Kong	28	2.8	Low
China	46	4.0	Low
Taiwan	21	1.7	Low

\*Data provided by Global Slavery Index on walkfree.org



RISK CATEGORY	TYPE OF SERVIC	E		
Nil	<ul> <li>Federal or state government departments</li> <li>Small suppliers with annual invoice value below \$300k</li> <li>Companies providing one-off services e.g. equipment installation</li> </ul>			
Low	<ul> <li>Australian companies providing in-direct services/utilities to SPL</li> <li>Companies supplying laundry equipment for one-off project work or general off-the-shelf products to SPL</li> <li>Companies (own or subcontractor) with overseas manufacturing facilities in areas with low prevalence and under 50% vulnerability according to the Global Slavery Index producing products for SPL</li> </ul>			
Medium	<ul> <li>Companies with staff working at SPL sites or processing SPL products within Australia</li> <li>Companies (own or subcontractor) with overseas manufacturing facilities in areas with increased vulnerability according to the Global Slavery Index producing products for SPL</li> </ul>			
High	Companies (own or subcontractor) with overseas manufacturing facilities in areas of most prevalence and high vulnerability according to the Global Slavery Index producing products for SPL			
SUPPLIER	COUNTRY OF ORIGIN	CATEGORY (ie linen, machinery etc)	MODERN SLAVERY RISK LEVEL	
Host Supplies	Pakistan	Linen	Medium	
Host Supplies	China	Linen	Low	
Simba	India	Linen	Medium	
Simba	Bangladesh	Linen	Medium	
Simba	China	Linen	Low	

Labour Hire and Transport Suppliers are also considered a potential high risk. As such additional precautions, such as audits of the operations, demonstration of rate of remuneration being paid and declarations of compliance, have been put in place with these suppliers to ensure compliance.

### **OUR RESPONSIBILITIES**

The SPL CFO and People and Culture Manager have delegated responsibility for the overall management of modern slavery risks in our business and are directly accountable to the SPL Board. The SPL Board of Directors is responsible for signing off on the Modern Slavery Statement. The following table illustrates SPL's governance structure as it is relevant for assessing and managing modern slavery risks.

#### SPL BOARD

Responsible for approving the SPL ESG Strategy and Modern Slavery Statement.

#### SPL CHIEF EXECUTIVE OFFICER

Accountable for developing and implementing the SPL ESG Strategy which includes ensuring SPL is compliant with Modern Slavery legislation and working towards reducing the risk of Modern Slavery.

#### SPL SUSTAINABILITY COMMITTEE

Comprising of National team members, each with responsibility for delivering elements of the ESG Strategy, including Modern Slavery agenda items.

### NATIONAL MANAGER – PROCUREMENT

Responsible for managing the onboarding and maintenance of suppliers in accordance with the Modern Slavery Statement.

#### PEOPLE AND CULTURE MANAGER

Responsible for ensuring compliance with labour laws within the operations and supply chain.

## ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Considering the low-risk assessment of local business, SPL's primary focus is on suppliers who may fall within the higher-risk category, particularly suppliers in Asia.

When working with suppliers, SPL is clear that we are committed to operating business lawfully and ethically with suppliers who are aligned with our values. SPL works directly with suppliers to ensure they understand the expectations we have on them to operate in accordance with all applicable modern slavery laws.

Where possible, SPL conducts site visits of international factories to conduct audits and further enhance working relationships.

The SPL Human Rights and Social Responsibility Policy outlines SPL's commitment to respecting and promoting human rights in accordance with the UN Guiding Principles while SPL's Speak Up Policy provides employees (current and former), directors and suppliers an avenue to report any breaches of law's or SPL Policy's, including violations of human rights.

SPL also conducts a supplier questionnaire to allow us to assess the risk of modern slavery in our supply chain, and where appropriate, address any concerns.

## ASSESSING EFFECTIVENESS

With SPL's Speak Up Policy and Human Rights and Social Responsibility Policy, SPL assesses its effectiveness based on the number of reports of suspected modern slavery breaches, or complaints/grievances regarding modern slavery and reports this to the Board monthly.

SPL is committed to continue to develop and improve processes to ensure we can continue to actively manage modern slavery risks.

## CONSULTATION ACROSS OUR BUSINESS

The entities owned and controlled by SPL Holdings all operate under the direction and governance of the Board of SPL Holdings Pty Ltd and share the same executive management team.

In the process of preparing this statement, we have presented draft versions to our executive team and senior leadership teams to encourage discussion and invite feedback.

While the People and Culture function, in conjunction with the Procurement function, manage the systems, processes and tools that underpin our risk management approach and enable us to monitor effectiveness, the Board retains oversight of SPL's management of its modern slavery risks.

## STATEMENT AVAILABILITY

This statement is made in accordance with section 16 of the Modern Slavery Act 2018 and constitutes The Modern Slavery Statement of SPL Holdings ABN 85 600 456 808 for the year ending 30 June 2023, to prevent Modern Slavery in our business operations and supply chain.

This statement has been approved by CEO and Managing Director, Andrew Robson.

Andrew Robson

**CEO and Managing Director** 

# SPL

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