

Modern Slavery Statement 2023

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 2023.

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 are a leading group of electro-technology companies operating throughout Australia delivering installation, maintenance and manufacturing services from inception to replacement. Our workforce consists of more than 1,200 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 F23, the group worked with 3,500 suppliers, with the majority of our \$180m annual spend primarily located in Australia and some sourced from Asia.

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 with regard to the Group's objective in eradicating the risks of 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

The reporting entity has made limited progress and improvements in achieving the targeted actions set for F23.

The reporting entity acknowledges its current resource constraints in achieving the desired momentum for the development of a national approach to Modern Slavery. Consequently, efforts are underway to establish a more dedicated resource responsible for overseeing key functions including Sustainability and Modern Slavery as an overarching responsibility.

Progress has been made with finalising a questionnaire for companies who provide labour hire services to the reporting entity and there are plans to implement this in the forthcoming reporting period to address minimum compliance issues in this landscape.

In F24, the reporting entity seeks to gain momentum in establishing a national approach to address Modern Slavery and any possible risks, with the following actions to be undertaken:

- Establish a national role that incorporates compliance with the Modern Slavery Act within its broader set of responsibilities.
- Continue to engage with and educate our management team and new managers on modern slavery reporting and compliance with the Act.
 - A learning module addressing Modern Slavery is being formulated and will be delivered using our Learning and Development platform as mandatory awareness training.
- 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 under review and will be used when responding to Tenders and Questionnaires.
 - Our supplier Terms and Conditions (incorporating Modern Slavery reporting requirements) have been updated and is under final 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 2023

APPENDIX 1: ORGANISATION CHART

