



**RFI**  
TECHNOLOGY SOLUTIONS

# **Modern Slavery Statement**

## **FY 2022/23**

## Purpose

This statement is made in accordance with the Modern Slavery Act 2018 (Cth). It outlines the steps taken by RF Industries for the period of 2022 to 2023 to identify, assess and mitigate modern slavery risks in our business operations and supply chain.

## Reporting Entity

This Statement relates to the following entities:

RF Industries Pty Ltd (RFI)

**ABN: 11 001 695 512**

99 Station Road, Seven Hills NSW 2147

## About RFI

RFI is a family-owned Australian business founded in 1979 as a manufacturer of two-way radio antenna systems. With our origins in manufacturing over the past 40 years, our business has evolved into a leading global technology solutions company in Australia.

Our core business in the first decade was in the manufacture of mobile and base station antennas for the Australian two-way radio market. We opened a manufacturing facility in Victoria, Australia, and transformed this into a state-of-the-art facility which still operates today.

It was also in the first decade that we started selling solar panels – to power remote base station antenna sites all over rural and outback Australia. Power is an absolute necessity in outback Australia. We supplied and installed remote base station radio sites all over rural and outback Australia. This started our journey into the world of solar energy.

Today, our scope of operations includes the design and manufacture of radio communications products, project management, installation and commissioning of RF and Solar installations, warehousing, and distribution. We consistently maintain our *AS/NZS ISO 9001*, *AS/NZS ISO 14001* and *AS/NZS ISO 45001* certifications.

RFI's headquarters is based in Sydney.

## Our Approach

Our statement has been developed in consultation with RFI's business units. It outlines our continued efforts to detect the risk of modern slavery across our business and supply chain and ensures that we have the most appropriate responses to that risk.

RFI values and promotes responsible corporate citizenship and shall work with our supply chain partners to always maintain the highest ethical standards throughout our business.

## Our Values

RFI promotes the RFI Blue Values within the business.

### Blue Sky

#### **Open Our Minds to New Ideas**

At RFI we will look towards the future for new technologies and market trends. We look for innovative and creative solutions and listen openly to new ideas and opinions.

### Blue Ribbon

#### **Nail It in Service & Quality**

At RFI we put our customer first by listening and delivering to our customer's needs. We work to deliver the best quality product and service – always. We will thoroughly investigate and work together to resolve issues. We will work safely at all times.

### True Blue

#### **Integrity, Team Spirit & A Fair for All**

At RFI we give our colleagues a 'fair go' and treat each other with respect. We speak openly and honestly and call each other out on poor behaviours. We celebrate team successes. We work hard, play hard, and have some fun.

## Our Process

During the reporting period, RFI's planning, and assessment of its modern slavery responsibilities included the following:

- A review and update of our Ethical Standards and Social Responsibility Procedure
- A review and update to our Supplier Code of Conduct including planning for distribution to existing suppliers to agree to updated requirements
- The process and documentation for our updated Supplier Modern Slavery Self-Assessment Questionnaire
- All new and potential suppliers are required to sign updated questionnaire and provide information
- Communications at our staff quarterly roadshows lead by our CEO
- Engagement and input from company Board members

RFI developed training content specific to modern slavery practices and our policies and procedures to control the associated risks. This content is included in our initial employment inductions and when required through refresher training.

A more detailed course is being sourced for employees who require specific knowledge and capabilities to successfully implement and administer operational activities during their employment.

## Our Policies and Governance

RFI possesses a robust governance framework that is underpinned by policies and procedures aimed at addressing modern slavery. This includes:

### **Risk Management Framework**

Our Risk Management Framework adopts a risk-based approach to our operations and supply chain, decision making and compliance obligations.

### **Code of Conduct**

Our Code of Conduct is outlined in the Employee Handbook provided at commencement of employment and available to all employees via our Intranet.

The Code of Conduct applies to all employees of RFI, including permanent full-time, part-time employees and casuals. The Code of Conduct provides a framework of principles for conducting business and dealing with customers, colleagues, and other stakeholders.

### **Social Accountability Policy**

Our Social Accountability Policy demonstrates our commitment to upholding the human rights of our own workforce and supply chain.

This policy is based on The Universal Declaration of Human Rights, The International Labour Organization's Declaration on Fundamental Principles and Rights at Work, The United Nations Convention against Corruption and Occupational Health and Safety Management Standard *AS/NZS ISO45001*.

### **Ethical Conduct and Social Responsibility Procedure**

This procedure details the processes required to report on and address the risks associated with RFI operations and supply chains in compliance with the *Modern Slavery Act 2018*. It also provides information and instruction on ethical behaviour.

### **Supplier Code of Conduct**

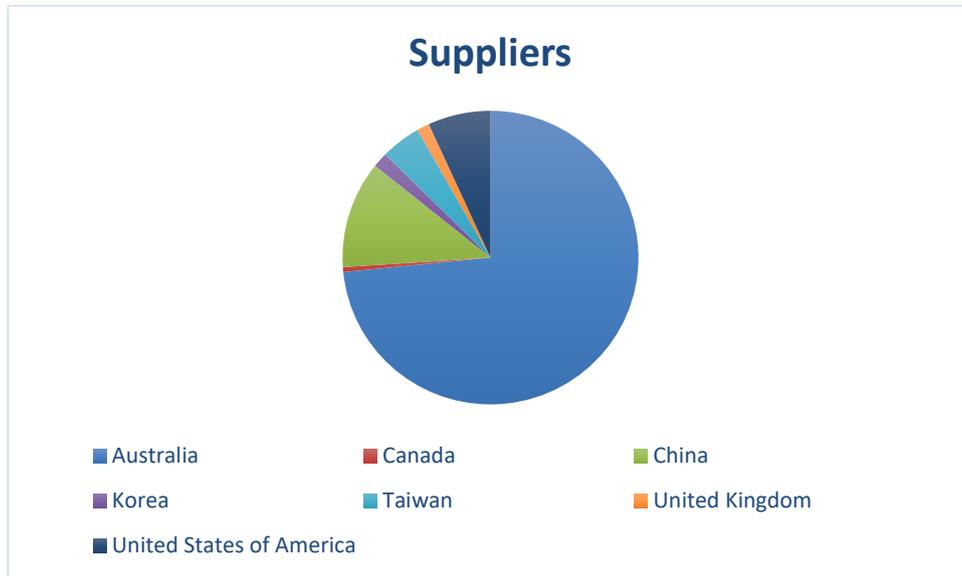
Our Supplier Code of Conduct outlines our expectation that our suppliers will act in a manner that is consistent with the principles for socially responsible, sustainable, and ethical business practices and that these principles are adopted throughout the supply chains.

### **Whistleblower Policy**

Our Whistleblower Policy demonstrates the importance RFI places on ensuring a safe and supportive environment, creating a culture within RFI that encourages our people to speak up and raise breaches of internal rules or policy, disclosable conduct relating to the company, its branches, officers, or employees.

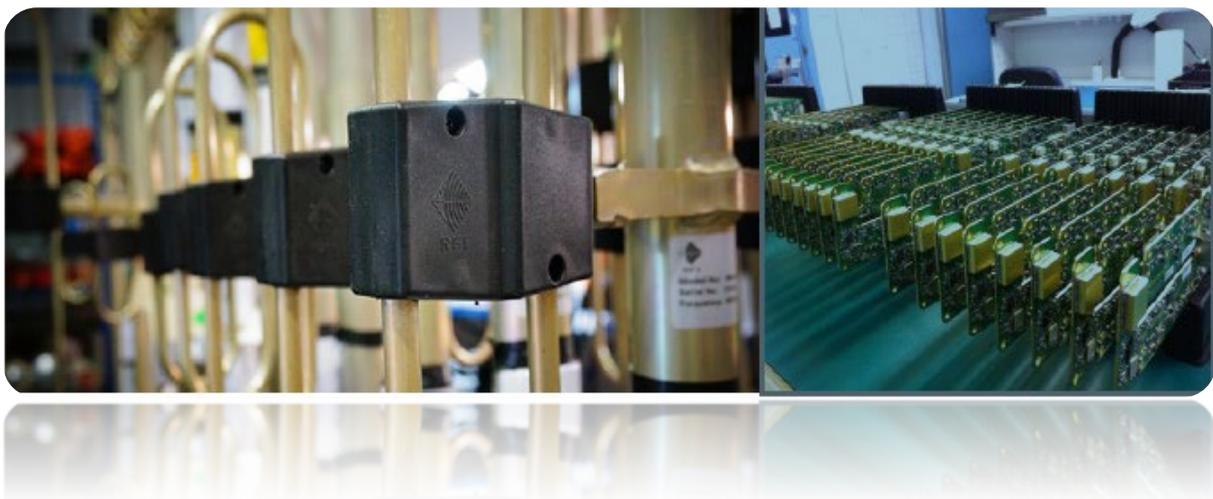
## Supply Chain Overview

RFI manages approximately 300+ suppliers around the globe. Our supply chains are diverse, with both domestic and international suppliers in the Asia-Pacific region, the UK and USA.



Our key business supply chains provide materials and components for the following.

- Communications & Wireless – cables, connectors, cellular antenna, GPS antenna, GSM antenna, ISM antenna, marine antenna, UHF & VHF antennas, batteries, and chargers.
- Energy – DC/DC converters, energy storage, HV & LV battery inverter, industrial batteries, microinverters, small area modules, solar modules, solar mounting systems, solar regulators, string inverters and monitoring systems.



RFI recognises the importance of obliging to legal and ethical practices to help eliminate human right risks domestically and internationally. We are committed to identify and mitigate any risks exposed in modern slavery in our supply chain and have the highest expectations that our suppliers share the same commitment.

RFI are proudly an Australian company and engage suppliers and contractors primarily domestically, and by doing so all suppliers are adhered by Australian labour regulations, employment standards and regulatory infrastructure, therefore our activities were deemed low risk.

## **Our Due Diligence**

The steps we have taken to assess and mitigate modern slavery risks have focused on assessing and improving our supply chain assurance programme through the review and update of our Supplier Code of Conduct, provisions for the adherence with modern slavery laws and implementation of supplier risk assessment tools.

The Supplier Code of Conduct is communicated to suppliers as part of our tender process and is incorporated into our due diligence process. Activities undertaken as part of this process assists in identifying potential risk.

New and renewed supply agreements include modern slavery and Supplier Code clauses. This requires, amongst other things, that suppliers and their third-party suppliers, adhere to the principles in the Supplier Code, implement due diligence processes and take reasonable steps to minimise modern slavery risk in their operations or supply chain.

We will continue to explore opportunities to ensure we are identifying, assessing and mitigation the risk of modern slavery within our supply chains.

## **Training and Capacity Building**

We provide training programs and initiatives to raise awareness and build capacity among our employees, particularly with respect to modern slavery practices, policies and procedures through induction and onboarding programs to raise awareness and address modern slavery risks.

At RFI, we believe that enhanced training programs for employees, suppliers, and partners to increase awareness of modern slavery risks and prevention measures. Through our online training module, we have developed specialized training for employees with specific responsibilities in managing these risks.

## Assessment of Modern Slavery Risks

The practices that comprise modern slavery include trafficking of persons, slavery, servitude, force marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour.

Our management of modern slavery risks in our operation and supply chains fall into our wider organisational risk management framework.

RFI has assessed the risk of modern slavery within our operations and supply chain and have deemed this as a low risk given primarily of our suppliers are based in Australia where they need to adhere to Australian labour regulations, minimal employment standards and regulatory infrastructure to enforce associated statutory obligations.

RFI uses a Modern Slavery Risk Factor Self-Assessment form which suppliers are requested to complete and submit on an initial basis to assist in its reporting requirements under the *Modern Slavery Act 2018*. RFI reserves the right to conduct regular audits on its suppliers to ensure compliance with the act.

The completed forms are assessed to determine the risk rating for the individual supplier for the reporting year. All documents are securely maintained in the individual supplier profile within our ERP system.

## Actions Taken

RF Industries Pty Ltd (RFI) has taken a series of concrete actions to address the risks associated with modern slavery and human trafficking. These actions are aligned with the company's commitment to ethical and responsible business practices. The following actions have been implemented:

- **Policy Development and Updates:** RFI has developed and regularly updates its Ethical Standards and Social Responsibility Procedure. These policies set clear guidelines for ethical behavior, labor practices, and responsible business conduct. This serves as a foundational step in addressing modern slavery risks.
- **Supplier Code of Conduct:** The company has reviewed and updated its Supplier Code of Conduct to ensure that it explicitly addresses modern slavery risks. This code outlines RFI's expectations from suppliers regarding socially responsible, sustainable, and ethical business practices. The inclusion of modern slavery clauses in supplier agreements enforces compliance with these standards.
- **Supplier Modern Slavery Self-Assessment Questionnaire:** RFI has designed a comprehensive Supplier Modern Slavery Self-Assessment Questionnaire to evaluate its suppliers' commitment to addressing modern slavery. This questionnaire helps assess the potential risks associated with suppliers' operations and supply chains. By requesting suppliers to complete this questionnaire, RFI ensures that its supply chain partners are aware of the company's expectations regarding modern slavery.

- **Training Initiatives:** The company has developed specific training content that addresses modern slavery practices, policies, and procedures. This content is integrated into the initial employment inductions for new employees and during refresher training for existing employees. RFI recognizes that raising awareness and educating its workforce is crucial in addressing modern slavery risks.
- **Advanced Training:** RFI is in the process of sourcing advanced training programs for employees who require specific knowledge and capabilities to successfully implement and administer associated operational activities. This specialized training ensures that employees possess the skills needed to effectively address and mitigate modern slavery risks.
- **Supplier Audits:** The company reserves the right to conduct regular audits on its suppliers to ensure compliance with the Modern Slavery Act 2018. These audits will further assess suppliers' adherence to ethical labor practices and their commitment to minimizing modern slavery risks within their operations and supply chains.

These actions demonstrate RFI's proactive approach to addressing modern slavery risks. By focusing on policy development, supplier engagement, training, and audits, the company aims to build a more transparent, ethical, and responsible supply chain while reducing the potential for modern slavery in its operations.

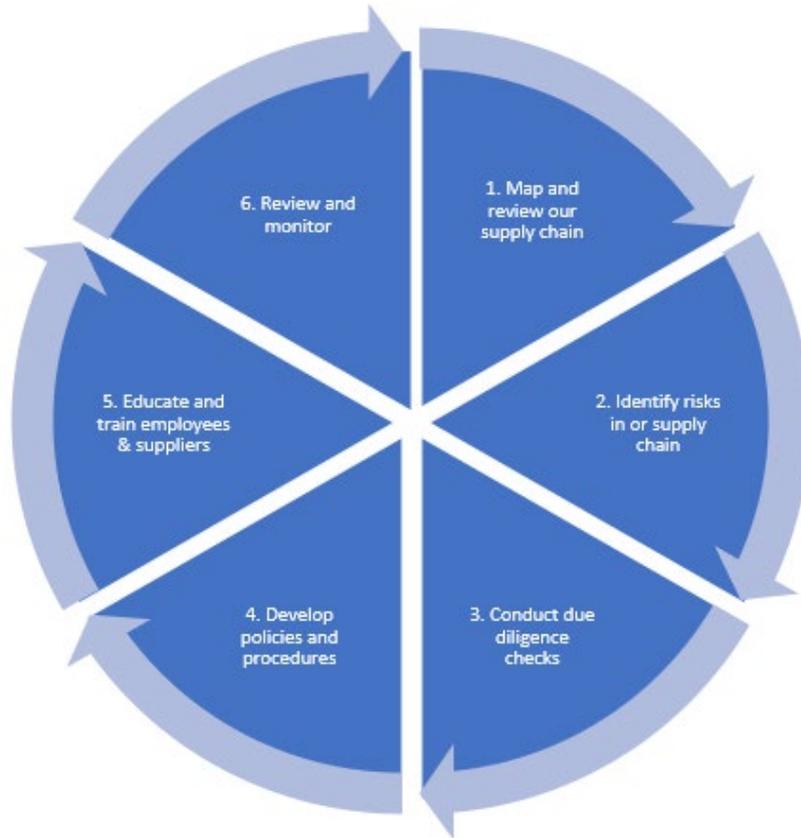
## Measuring Effectiveness

Whilst this is a complex issue on a worldwide scale, it presents challenges for all corporations in terms of providing credible measurements as to their effectiveness in addressing modern slavery risks and the further down the supply chain the more diluted it can become.

Once our supplier questionnaire is received, they are reviewed to determine the level of risk it presents to our business at that time.

The results of the questionnaire are communicated to our operations teams who will update the supplier status and applicable rating within our ERP system and address any concerns with those suppliers raised during the assessment process.

RFI's Process flow of our modern slavery plan is set out below.



## Grievances and Remediation Processes

We are committed to the protection and respect of human rights across our business and supply chain. Where we identify that RFI has caused or contributed to adverse impacts such as modern slavery, we will seek to address human rights grievances in line with the relevant policies, procedures, and legislative requirements.

Where risks are identified in our supply train, RFI's preferred approach is to work with the supplier to develop a corrective action plan with agreed timeframes rather than terminating supplier arrangements.

## Approval

This Statement has been approved by the Board of RFI Holdings Limited ACN 146 014 379 on the

  
\_\_\_\_\_ Scott Magee 15 June 2023

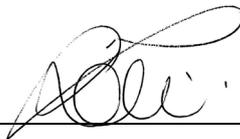
CEO

  
\_\_\_\_\_ Steve Jaques 15 June 2023

Executive Director

  
\_\_\_\_\_ Duncan MacLean 15 June 2023

Director

  
\_\_\_\_\_ Lloyd Zenari 15 June 2023

Director/ Head of Services

  
\_\_\_\_\_ Bruce Crane 15 June 2023

Chairman/ Director

  
\_\_\_\_\_ Greg Young 15 June 2023

Independent Non-Executive Director