



Modern Slavery Statement 2022

Rinnai



Our Commitment

Rinnai Australia Pty Ltd (Rinnai) together with its subsidiaries (the RA Group) oppose modern slavery in all forms and is committed to mitigating the risk of modern slavery occurring within its business operations and supply chain. This statement seeks to outline the initiatives taken by the RA Group to meet its commitment in this regard during the financial year ending 31 December 2021 (Reporting Year).

Reporting entity

This statement is provided for the RA Group, consisting of the following entities:

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|---|--------------------------|
| • Rinnai Australia Pty Ltd | ACN 005 138 769 |
| • Gas Appliance Services Pty Ltd | ACN 070 845 859 |
| • Jordans NSW Pty Ltd | ACN 103 872 313 |
| • Mills Road Property Trust | ACN 134 796 754 |
| • Malcolm Road Property Trust | ACN 291 008 749 |
| • Rinnai Manufacturing Malaysia Sdn Bhd
(incorporated in Malaysia) | 201901036498 (1345828-P) |



The Rinnai way

Our structure, operations and supply chain

Rinnai is a wholly-owned subsidiary of Rinnai Corporation, a listed company based in Nagoya, Japan, with a primary business of manufacturing, importing and distributing hot water, heating, cooling and commercial appliances.

Rinnai has a world-class manufacturing facility in Victoria, supported by a large national sales and distribution network. This business has become a 'centre of excellence' in specific technologies for Rinnai Corporation globally and engages significant R&D and product development activity on behalf of other Rinnai entities across the world.

Our products extend across a broad category base, covering hot water, heating and cooling systems for single rooms, whole house and commercial buildings, renewable energy systems including heat pump, solar, geothermal and photoelectric appliances for renewable energy hot water and heating/cooling applications, gas log fires and other home comfort appliances.

Rinnai has built a number of iconic product brands including Rinnai Infinity, Hotflo, Equinox, Bravis Wombat, Buffalo, Energysaver, APAC and a variety of solar and commercial brands, which have become household names in Australia and in foreign markets to which Rinnai exports.

Rinnai employs over 500 staff across Australia, administered by its head office in Victoria. We are committed to conducting our business with the utmost integrity and ethical values, in accordance with relevant laws across the world. We expect our suppliers to conduct their respective businesses with the same values and principles we uphold.

Our supply chain is wide and diverse, with many products, components and parts being sourced from overseas. We engage the services of contractors and subcontractors, including workers through labour hire agencies. We expect all our suppliers to respect and protect the human rights of their employees and provide humane working conditions.



Modern slavery risk assessment and due diligence

Rinnai's policy against modern slavery (Anti-Slavery Policy), sets out clear objectives, initiatives and expectations of our employees and suppliers, and the manner in which any identified or suspected risks of modern slavery will be managed.

We have engaged with our top suppliers through a supplier communication which outlines our commitment to mitigating the risk of modern slavery in our supply chain. Suppliers have provided us information regarding their operations and supply chain by way of a supplier questionnaire. Some of our larger suppliers have implemented modern slavery policies and initiatives. We have reviewed their internal policy statements which evidence their commitment and alignment of the core values upheld by Rinnai in relation to modern slavery.

We have identified a few suppliers who have indicated limited knowledge and awareness in modern slavery matters, especially the requirements under the modern slavery legislation. We will assist those suppliers to better understand the concept of modern slavery, so they are better placed to identify, mitigate and rectify any modern slavery in their operations and supply chains.

Rinnai has not identified any instances of modern slavery in its operations. We will continue to provide our employees with resources and support necessary to avoid any instances of modern slavery, and also report any potential instances if any.

Rinnai will carry out a risk assessment of its supply chain annually and continue to provide information and assistance to suppliers who may require it.



Accountability

Accountability and effectiveness

At Rinnai, every employee is responsible for respecting human rights. We require our employees to report any concerns directly, or anonymously if preferred, without fear of retaliation or retribution. All our employees undertake mandatory training on Rinnai's code of ethics and conduct, equal opportunity, anti-discrimination harassment and workplace bullying policies. In accordance with Rinnai's Whistleblower Policy, employees can report concerns through multiple reporting channels, including line managers, General Managers, Human Resources, and Legal. We investigate all allegations regardless of the source.

Rinnai will take immediate and appropriate action to remediate and address any identified breaches of our policies.

We are working through a progressive implementation of the Anti-Slavery Policy to the broader supply chain, and we understand that some suppliers are operating in countries that are yet to introduce modern slavery legislation. We strongly encourage our key suppliers to adopt the same ethical standards followed by Rinnai, and will continue to share information and build understanding and commitment in eradicating any modern slavery practices in their supply chains. Through our annual risk assessment process, we require our top suppliers to report any identified instances of modern slavery in their operations and supply chain.



Consultation

The RA Group share the same core business operations and supply chain. This joint statement has been prepared in consultation with the key business areas of the RA Group including Procurement, Manufacturing, Legal, Internal Controls and Audit, Finance and Human Resources. The Board of Directors of each of our subsidiaries are aware of this statement and have approved it.

Covid -19 Pandemic

The Rinnai business has continued to operate during the Covid-19 lockdowns in 2021, with minimal disruption to its facilities and operations in Australia. Whilst a few of Rinnai's local and overseas suppliers have faced disruption due to lockdowns and restrictions imposed by national or state governments, Rinnai has managed to keep the business and economic impact to a minimum. Rinnai is not aware of any increased risk of modern slavery in its operations or supply chain due to the pandemic.



Next steps

We will continue to work through and build on our current initiatives to identify, assess and address modern slavery risks within our operations and supply chain. We will initiate further engagement with targeted groups of suppliers to provide additional information and assistance in aligning their business practices to the standards and expectations outlined in our policy.

The progress of our initiatives will be reported through our annual modern slavery statement.

This statement is made pursuant to the Modern Slavery Act 2018 (Cth). This statement has been approved by the Board of Directors of Rinnai Australia Pty Ltd on 1 April 2022 and is authorised by all of its subsidiaries.

Greg Ellis
Managing Director
Rinnai Australia Pty Ltd



May 2022



Rinnai Australia Pty Ltd

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For further information
call 1300 555 545 or visit
rinnai.com.au

TOTAL HOME COMFORT



HOT WATER



HEATING



COOLING

Rinnai