



BLC-HSEQ-PD-004-Modern-Slavery-Policy

BLC Electrics Pty Ltd is fully committed to the prevention of Modern Slavery and Human Trafficking and will not tolerate or condone any such identified act within our operations or supply chains.

In accordance with the 2018 Modern Slavery Act, this statement sets out the steps we've undertaken as a business in the prevention of Modern Slavery or Human Trafficking within our operations or supply chains.

We're committed to fulfilling our obligations under the Modern Slavery Act and to continue using our influence to increase transparency on this issue to protect vulnerable workers and prevent human rights violations.

We do not tolerate forced labour, child labour, threats, coercion, abuse, violence or intimidation among our employees or in our supply chain.

We believe Modern Slavery risks are very low within our direct operations. However, Modern Slavery risks potentially exist in our global supply chain and this is where we will focus our efforts. We have not, as yet, found any evidence of Modern Slavery in our global supply chain.

Introduction

Modern Slavery is a growing problem globally, more prevalent in some geographies and sectors than others. However, we realise that no sector or industry is exempt from this crime. Modern Slavery takes many forms including:

- Forced labour – forced to work under the threat of some form of punishment.
- Debt bondage or bonded labour – when a person is forced to work to pay off a debt or other obligation. The world's most widespread form of slavery.
- Human trafficking – transporting, recruiting people for exploitation, using coercion.
- Descent-based slavery – people born into slavery because their parents or other family members are/were enslaved.
- Child slavery – Not just child labour but child trafficking, child soldiers, child domestic slavery or child marriage.



Organisational Structure

BLC Electrics Pty Ltd is based at Croydon 3136.

BLC Electrics Pty Ltd supplies electrical installation services for business customers in Australia, including small businesses, large businesses, governments and charities. Our work is conducted solely in Australia and is delivered by a workforce all of whom are fully eligible to work within these areas

Supply Chain

The products and services provided by BLC Electrics Pty Ltd require a global supply chain. Although we chiefly contract with Australian-based businesses (contract fulfilment may be undertaken across the globe and there will be workers in Asia, Europe and North America working to deliver BLC Electrics Pty Ltd contracts.

We consider that any exposure to the risk of Modern Slavery or Human Trafficking is extremely low and that should any risk exist it is most likely to be within the extended Supply Chain, nevertheless, we review our supply chains to ensure the potential for slavery and human trafficking is reduced.

We work closely with members of our Supply Chain in the identification of such risk to ensure it is addressed appropriately.

We tell the companies we do business with that we are not prepared to accept any form of exploitation.

Our Terms and Conditions of Business contain an anti-slavery clause. This clause prohibits suppliers and their employees from engaging in slavery or human trafficking if they want to do business with us.



Modern Slavery Policies

BLC Electrics Pty Ltd has implemented a comprehensive policy in respect of the prevention of Modern Slavery and Human Trafficking. This policy details our approach to the prevention of Modern Slavery and Human Trafficking, along with the processes used to support and deliver our commitment. This policy and commitment have been communicated to our employees for their information and action.

We operate a risk-based approach to the identification of Slavery and Human Trafficking the principle of which is based on the location of the product or service, industry sector, supplier relationships, and existing data held supported by additional information guidance obtained.

Identification of Risk

BLC Electrics Pty Ltd supply Chain is primarily Australian based, we have instigated a risk assessment of supply chain activities to identify and prioritise any areas where we can add most leverage in respect of the prevention of Modern Slavery.

BLC Electrics Pty Ltd policy of direct employment is supported by robust processes, which ensures that an individual's identity is confirmed, and they have a legitimate right to work in Australia. This policy and the right to work checks undertaken by our employees minimise the risk of employing forced labour or those who may be subject to human trafficking.

We take the following actions when recruiting:

Recruiting Directly

1. We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
2. We always ensure staff are legally able to work in the country in which they are recruited.
3. We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
4. We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
5. If through our recruitment process, we suspect someone is being exploited, the HR Department will follow our reporting procedures.



6. We conduct due diligence checks on any recruitment agency that we use to ensure that it is reputable and conducts appropriate checks on all staff that they supply to us.
7. If through our recruitment process, we suspect someone is being exploited, we will follow our reporting procedures
Recruitment using agencies.

BLC Electrics Pty Ltd follows firm policy and only uses agreed specified reputable recruitment agencies.

To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:

1. Conducting background checks.
2. Investigating reputation.
3. Ensuring the staff, it provides have the appropriate paperwork (e.g. work visas).
4. As appropriate, ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying.

We keep agents on the list under regular review.

Risk assessment

As an Australian based business neither our sector nor our operating location are areas of high risk. However, we do procure products and services from areas of heightened risk.

Internal Risk

Assessment: Very low

Our people are key to the success of our business, so we invest heavily to make BLC Electrics Pty Ltd a workplace of choice. We believe employee diversity and inclusion and the different perspectives it brings gives us a competitive advantage. When recruiting new staff or in the course of employment of existing staff.



We treat all people fairly and impartially, without prejudices related to race, colour, nationality, ethnic origin, religion, gender, sexual orientation, marital status, age, political affiliation, disability or family responsibilities and we set our pay and rewards packages to attract the market's best talent.

We recruit and manage employees against a range of policies designed to create a unique and diverse environment. Our supportive policies such as maternity, paternity, adoption leave, and flexible working make BLC Electrics Pty Ltd accessible to all.

Internal employee engagement surveys as well as external reference points, such as awards, show that BLC Electrics Pty Ltd is a workplace of choice. We, therefore, perceive internal risks to be very low.

External Risks

Assessment – heightened

Modern Slavery risks are heightened in labour intensive and/or under-regulated industries, and geographies. Sector and location are therefore a means to identify areas of heightened risk. BLC Electrics Pty Ltd has a small number of non-domestic suppliers that operate in both at-risk sectors and at-risk geographies. We believe this is where our only significant risk may reside. We have therefore targeted these areas with due diligence activities.

Due Diligence

Our risk-based approach to due diligence considers both the nature of the supplier activity and its location. Labour intensive activities in at-risk regions, i.e., regions identified as high risk by external bodies (such as the Global Slavery Index) are where we focus our attention. Suppliers employing migrant workforces are a particular target as we know that these individuals are vulnerable to exploitation.

Domestic (Australian) due diligence & Non-domestic suppliers

Domestic & Non-domestic suppliers in at-risk geographies have included suppliers involved directly and indirectly in supplying devices, software and services. It's in these global supply chains where we believe the greatest risk of Modern Slavery and human trafficking resides and this is where the



majority of our due diligence efforts have been focused. Due diligence may be conducted before contracts are signed with suppliers and during a contract's term.

We use a variety of due diligence approaches, our activities to date include:

- The development and implementation of the policy and procedures in respect of the prevention of Modern Slavery.
- The communication of our policies and procedures.
- Policy and process reviews.
- On-site audits by BLC Electrics Pty Ltd, including private interviews with workers.
- Audits by competent third parties.
- Training, governance and reporting.

Communication and Training

BLC Electrics Pty Ltd commitment to the prevention of Modern Slavery and Human Trafficking emanates directly from our Director. His leadership and commitment to this important social issue have been communicated both internally to employees and externally to subcontractors and supply chain partners.

All employees who have direct responsibility and involvement for the engagement of workers and for dealing with supply chain matters have received appropriate levels of training in these issues.

All employees of BLC Electrics Pty Ltd must complete a training course on the Modern Slavery Act on induction and annually thereafter.

Governance

Our company is responsible for approving and monitoring our commitments to upholding the principles of the Modern Slavery Act.

Acknowledgement

We acknowledge that we are in the early stages of a long-term process and our approach to the Prevention of Modern Slavery and Human Trafficking will undoubtedly change year on year. We will utilise our annual statements to reaffirm our continued commitment and communicate this



evolution including the steps we have taken and will continue to take to deal with this socially important issue.

Reporting any concerns

We encourage anyone with concerns about Modern Slavery relating to BLC Electrics Pty Ltd to email admin@blcelectrics.com.au

This facility allows suppliers and members of the public to ask questions, make suggestions, report incidents, or lodge complaints.

We also support employees when faced with ethical dilemmas. Our approach is designed to encourage a culture of honesty and openness whereby our people are confident to raise matters that may be of concern to them.

Employees with any concern are also requested to contact in confidence via email to admin@blcelectrics.com.au

Looking ahead

We will continue to integrate Modern Slavery risk management into our routine sustainability management approach. We will also look at means to grow the level and depth of our supply chain due diligence.

Approver Name: Brett Chynoweth Date: 20/01/2022

Approver Signature:  _____