

Zenith RBA specialise in:

- Design, manufacture and distribution of high-quality commercial workstations, seating, storage and loose furniture;
- Project management of commercial furniture interiors installation into fit-out projects.

## REPORTING ENTITY

Zenith RBA is a limited liability commercial furniture company with operations across all states of Australia, New Zealand, China, Singapore and Hong Kong. Zenith designs, manufactures and distributes products via an extensive supply chain including component manufacturers, furniture suppliers and external subcontract installers. This is the sole entity.

## Scope

This Statement applies to all Zenith Interior's business operations and associated subcontractors and suppliers within Zenith Interior's supply chain.

## Applicable Law

This Statement supports the intent of international conventions, treaties, and protocols relevant to combatting modern slavery and the Modern Slavery Act 2018 and covers the reporting period of 1<sup>st</sup> July 2022 to 30<sup>th</sup> June 2023.

## Introduction

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. It includes exploitations including human trafficking, slavery, servitude, forced labour, forced marriage, debt bondage, child labour, and deceptive recruiting. It also includes actions of other parties who are involved in supporting financial or commercial transactions or contributing to any business or undertaking involving servitude and slavery.

This Statement affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations. Management is firmly committed to complying with equal opportunity and anti-discrimination legislation.

It is consistent with our ethical framework, that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations.

## Commitment

Slavery, including any situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power, or deception, and human trafficking, is abhorrent and Zenith RBA is committed to ensuring that it is absent from Zenith Interior's business and its supply chain. Zenith Interior's respect for human rights refers to internationally recognised human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. To demonstrate its commitment to anti-slavery, Zenith RBA shall:

- seek to identify and risk mitigate any adverse human rights impacts that Zenith RBA may cause

or contribute to through its own business activities, or which may be directly linked to its operations by its business relationships.

- avoid causing or contributing to adverse human rights impacts through its own business activities and address such impacts when they occur.
- seek to prevent, or mitigate, adverse human rights impacts that are directly linked to Zenith Interior's operations and by its business relationships, even if they may not have knowingly contributed to those adverse impacts.
- exercise a due diligence process to identify, prevent, mitigate, and account for how Zenith RBA addresses possible impacts on modern slavery and human rights; and
- exercise management system processes to enable the remediation of any adverse human rights impacts to which Zenith RBA, or its subcontractors and suppliers may contribute.

Zenith RBA have also commenced mapping the supply chains of its operations with 70% of our suppliers based in Australia. The remaining suppliers are based in the China and New Zealand.

### Suppliers

We expect that our suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations, they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify our business as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate. Zenith RBA has also implemented a process where all suppliers are assessed as meeting modern slavery compliance.

### Statement of Risk Appetite and Effectiveness

Zenith RBA has a zero tolerance of slavery in all its forms. This means that Zenith RBA has no appetite for causing harm to persons, damaging its reputation, being subject of legal action or incurring financial loss or standing in the business community arising from a failure to comply with the Law set out in the Modern Slavery Act 2018.

Zenith Interior's policies, management system processes, procedures, controls, and risk mitigation strategies are designed to reduce the risk and the prevalence of modern slavery.

Zenith RBA shall publish this Modern Slavery Statement on its website (for subcontractor and supplier access/reference when tendering), as a means of communicating Zenith RBA' due diligence processes and commitment in relation to the Modern Slavery Act.

Zenith RBA has created a preferred list of suppliers and subcontractors. This means that our agreements are more frequently recurrent in nature reducing the level of uncertainty involved for the workers engaged by our subcontractors. The preferred supplier and subcontractor list is reviewed annually by Zenith RBA Directors and Senior Management. Those on the list with a higher spend are reviewed before the award of any subcontract. Various assessment criteria are involved including: modern slavery risks, financial capacity, environmental record, quality record, safety records, costs, reliability, availability.

As part of the annual review of the preferred supplier and subcontractor list, Zenith RBA Directors and Senior Management in prior reporting periods performed a risk assessment to identify those parts of the business operations and supply chain where there may be a risk of modern slavery taking place.

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Our FY 21-22 and FY 22-23 assessment result was that it was either unlikely that slavery was occurring within those subcontractors or suppliers, or that Zenith RBA had no knowledge of same occurring. However, Zenith RBA is not complacent and as a result of the risk assessment identified sensible, risk-based measures that have been taken to reduce identified risk to within the Boards stated level of risk appetite.

Zenith RBA is currently in the process of commencing discussions with multiple external companies that provide specialised modern slavery software for risk identification in our supply chains and are taking steps to implement this software to improve the effectiveness of our approach in this space. In our recent reporting period, we determined the location of all suppliers nationally and internationally. Further to the commencement of this dialogue with our preferred suppliers and subcontractors, Zenith RBA has identified actions that will, when implemented, require participants in our supply chain to attest to an absence of non-compliant activity; to sign contracts/agreements that require compliant behaviour and to report slavery related issues/non-compliances to Zenith RBA. Zenith RBA shall carry out remedial steps where modern slavery is identified.

### Ethical Investments

Our business seeks to ensure that no investment should knowingly be made in companies who engage in activities or services which could be directly viewed as compromising the intent of this Statement.

### Reporting concerns of modern slavery

A key part of supporting ethical standards is enabling our workers and suppliers to feel free and safe to speak up when there are reasonable grounds to suspect that our business or related persons are not acting ethically or in accordance with laws and obligations.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 444 to discuss or report a suspected case. Contact can be made anonymously.

### Application Of this Statement

We seek the co-operation of all workers, suppliers and other parties working with our business. We encourage suggestions for realising our equal opportunity and anti-discrimination objectives to create a fair and tolerate working environment.

This Statement applies to all business operations and functions, including those situations where workers are required to work at any site not controlled by our business.

### How Zenith RBA Combats Slavery

In order to combat slavery, Zenith RBA has taken the following steps to demonstrate compliance with the Modern Slavery Act:

- Zenith RBA Directors and Senior Management have performed a risk assessment to identify those parts of the business operations and supply chain where there may be a risk of modern slavery taking place. The risk assessment is performed annually, and the outputs and actions are reviewed by Zenith Interior's Board of Directors. Zenith RBA considers itself to be at "low" risk of slavery arising (meaning that it is either unlikely, or known, that slavery is not occurring), but Zenith RBA is not complacent and as a result of the risk assessment has identified sensible, risk-based measures to reduce identified risk to within the Boards stated level of risk appetite.
- Persons employed by Zenith RBA have a formal contract of employment, to reduce risk of forced

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labour occurring. Failure to act in accordance with this Anti-Slavery Statement may result in disciplinary action being taken.

- Zenith RBA has implemented and identified further checks in supply chain (principally those involved in providing subcontracted services and supply of goods and services to Zenith RBA) to reduce the risk of slavery occurring. Further actions have been identified and implemented that require participants in the supply chain to attest to an absence of non-compliant activity; to sign contracts/agreements that require compliant behaviour and to report slavery related issues/non-compliances to Zenith RBA, and Zenith RBA shall carry out remedial steps where modern slavery is identified.

Zenith RBA provide training for staff on modern slavery risks and impacts.

Zenith RBA shall publish this Anti-Slavery Statement on its website (for subcontractor and supplier access/reference when tendering), as a means of communicating Zenith Interior's due diligence processes and commitment in relation Modern Slavery Act 2018 compliance.

Zenith RBA stipulates anti-slavery and human rights expectations to staff, business partners and other parties directly linked to Zenith Interior's operations.

Zenith RBA shall ensure that this Anti-Slavery Statement is available and communicated internally and externally to all personnel, business partners and other relevant parties and is reflected in operational policies and procedures necessary to embed it throughout the business.

### Consultation

In anticipation of our modern slavery reporting, Zenith RBA undertake the following:

- Complete a review on the identification and management of human rights issues in the business and supply chain.
- Progress tracking of an ethical sourcing program in the operations and supply chains against objectives and other key performance indicators; and
- Actions undertaken by them to identify, assess, remediate and prevent modern slavery and human rights impacts in their supply chain.
- Provide staff with access to our Modern Slavery Policy on the company Intranet

Zenith RBA will formally review performance against this Statement annually with the intention to continually improve the effectiveness of the systems used to minimize the risk of noncompliance to the Modern Slavery Act 2018.

This statement was approved by the board of Zenith RBA on 22/12/23.



Greg McDonnell

Group Managing Director

Date: 01/07/2024

Next Review: 23/12/2024