



**STATEMENT UNDER THE MODERN SLAVERY
ACT (CTH) 2018 OCTOBER 2021
VERSION 1**

1. OVERVIEW

Solar Juice Pty Ltd - ABN 96 139 534 026 (Solar Juice) is an Australian Private Company first registered on 18th September 2009.

Our business focusses on wholesaling of solar energy products, for residential and commercial buildings.

We have thirty employees, and our office is based in Wetherill Park, Sydney Australia.

This statement, pursuant to the Modern Slavery Act 2018 (Cth), sets out the actions taken by Solar Juice to address modern slavery risks in our business and supply chain over the financial year ending 30 June 2021.

Solar Juice's annual turnover is over \$100 million.

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Solar Juice is structured as a single operational entity, with multiple disciplines/departments i.e.:

- Management and administration
- Sales
- Technical Service
- Distribution of product through our own warehouse and 3PL's located around Australia

Our Materials Supply Chain can be segmented as:

- 95%: Overseas Manufacturers (all with an Australian Office)
- 5%: Products manufactured overseas, sourced through an independent Australian distributor



3. THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF SOLAR JUICE

Most of Solar Juice's purchases are solar PV equipment, all of which are manufactured overseas.

As a small company, Solar Juice accounts for less than 0.1% of the manufacturing capacity of our most important suppliers. That should mean that we have little or no buyer power or influence over manufacturers and their policies, and so our only option would be to cease to purchase from that brand, should we object to their treatment of workers.

In practice the choices are not so limited.

The culture within the worldwide renewables industry is one where high corporate responsibility is valued. We see already that many of our key suppliers have published their own, credible, ethical manufacturing policies in the form of a Corporate Social Responsibility (CSR) report under Directive 2014/95 of the European Union.

While the CSR report format focusses on Sustainable Manufacturing, most reports include a statement on employee conditions.

With the EU & USA being a major market for solar PV equipment manufacturers, we rely in part on the buying power in those markets to ensure the ethical standards of manufacturers.

Further, as the world market is experiencing growth in the order of 20% p.a., and with much of the work being skilled or semi-skilled, staff retention is vital to manufacturers. Fair working conditions are cultivated in such economic environments, and the risks of modern slavery fade.

For these reasons, we hold that the risks of modern slavery practices in our key supply chains is low.

It is in the area of minor components where modern slavery is more likely to be of concern.

Low value, low tech components that compete in commodity markets, and where price is the key driver of sales, are the components that are more at risk of containing an element of substandard working conditions and modern Slavery Conditions.

For Solar Juice we have isolated this to be, for example, the bolts and generic hardware used to install solar systems.

Finally, there is a potential risk with the direct hiring of subcontractors (Virtual Assistants) in less developed economies where labour laws are less protective or not well enforced.

4. ACTIONS TAKEN TO ASSESS AND ADDRESS THOSE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

Solar Juice have approached the task of minimizing the risks of modern slavery according to the level of supply.

LEVEL 1 – Major Suppliers (95% of our supply chain)

- Reviewed existing company policies and statements of our major suppliers (e.g. Modern Slavery (UK), CSR Report (EU) and Company Annual Reports)
- Educated these suppliers as to the existence of the Modern Slavery Act (Cth) and have received from them, their own statement.
- Factory Inspections: In anticipation of the Act, and as part of our own ethical purchasing drive, our management inspected factories and met with manufacturers. In 2019/20 this included facilities in Germany, Austria, China and Singapore.



LEVEL 2 – Australian Wholesalers (5% of our supply chain)

- Reviewed existing company policies and statements of originating manufacturers where they exist (e.g. Modern Slavery (UK), CSR Report (EU) and Company Annual Reports)
- Educated these suppliers as to the existence of the Modern Slavery Act (Cth) and inviting them to make their own statement.

ADDITIONAL STEPS TAKEN BY SOLAR JUICE

Staff training and education

All senior management have been educated on the risks of Modern Slavery. This will be expanded to all staff, in the 2020/21 staff training calendar.

Policy Development

Modern Slavery is to be folded into our broader Ethical Purchasing Standards. As such, it comes under the Solar Juice's continuous improvement program. As we mentioned above, we conduct factory visits to the overseas facilities of our major suppliers. Our post trip report now formally includes a section on Modern Slavery.



5. HOW WE ASSESS THE EFFECTIVENESS OF SUCH ACTIONS

To date we have found no incidents of modern slavery in our supply chain

At this early stage, there are a range of ways that Solar Juice will demonstrate effectiveness of our actions, including:

1. The senior management will annually review and report on Solar Juice's response to modern slavery.
2. Track the number of actions that have been implemented to deadline, the number of high risk suppliers engaged, and levels of awareness among staff. This to be included in the annual review.
3. Prequalification checks for suppliers to be expanded to include a Modern Slavery Assessment. This process is to be audited annually, and to include a determination if mitigation measures have been consistently actioned.
4. Factory Visits: All factory visit reports will be required to include observations and the result of any discussions relevant to Modern Slavery. Pre-trip briefings will include a section on Modern Slavery: what to look for and what to ask.
5. Annually review with suppliers, how they are progressing any actions they have put in place to address modern slavery risks.

6. THE PROCESS OF CONSULTATION WITH ENTITIES THAT SOLAR JUICE OWNS OR CONTROLS

Solar Juice is a single entity and small buyer in a world market, with relatively little influence. However, by making this Statement, and inviting key suppliers to make a similar voluntary statement we have already received written statements for all of our major suppliers.





7. GOALS FOR 2020/21

1. Conduct training for all staff on Modern Slavery, what we are doing and their role.
2. Commit that all new suppliers must provide their own Modern Slavery statement.
3. Chase up any Australian Wholesalers for their Modern Slavery Statement.
4. Look for continuous improvement opportunities.

Rami Fedda

Supply Director

21st October 2021