

# Modern Slavery Transparency Declaration



Overall Weighted Score		
1.06		
Data Quality Score	Risk Assessment Results	Average Score
1.33	DECEPTIVE RECRUITING	0.75
1.33	TRAFFICKING	0.75
1.33	SERVITUDE	0.75
1.33	FORCED LABOUR	0.75
1.33	FORCED MARRIAGE	0.75
1.33	DEBT BONDAGE	0.75
1.33	CHILD LABOUR	1.50
1.33	DISCRIMINATION	1.25
1.33	EQUAL REMUNERATION	1.00
1.33	FREE ASSOCIATION + COLLECTIVE BARGAINING	1.33
Weight Total		1.06

## Bird Habitats | Thermal Haven Nest Boxes®

Thermal Haven Nest Boxes are designed to restore habitats for hollow-dependent fauna. The design addresses temperature variations within the inner nesting space. Air is used as a thermal buffer to create a stable microclimate and limit extreme temperature variations. Each nest box has a tracking number CNC engraved to the base for easy monitoring.

### Products Covered:

Thermal Haven Nest Boxes® including all size variations. This assessment does not include

Licence site/s: Drouin, Australia  
 Licence Number: BIH:TH01:2023:MS  
 Screening date: 17th November 2023  
 Valid to: 17th November 2023

**Compliance**

This declaration is a part of company's Modern Slavery Statement and hence it is to be read in conjunction with other documents.

## Company Structure Description:

Bird Habitats is a Family Partnership dedicated to their daughter Rose. Rose's Legacy of Love aims to ensure future generations can enjoy the biodiversity in Australia. Bird Habitats have a sustainable procurement policy which gives preferences to suppliers that minimise their environmental and human health impacts and a Modern Slavery Policy to monitor supply chain ethics. Thermal Haven Nest Boxes® are manufactured in Victoria, Australia from materials supplied by Australian based companies and greater than 99% of the raw materials originate from Australia.

Company MS Statement: Yes      Company MS Policy: Yes

## Overview Of Product Supply Chain Assessment

4 Of direct suppliers	100% Of suppliers evaluated	100% Suppliers risk assessed/ desktop assessed
0 No of suppliers at High Risk	100% Suppliers audited (unannounced)	0 Cases of non-conformance/ modern slavery

Content Declared Accurate for and on behalf of:

Bird Habitats

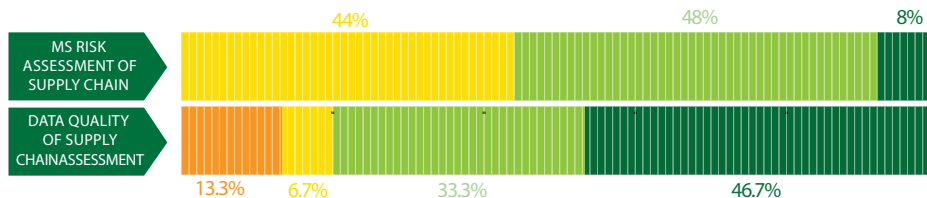
Katrin McMahon  
Partner

Chris McMahon  
Partner



Content Verified by:  
Global GreenTag International Pty Ltd

## Risk Assessment & Data Quality Summary



ASSESSMENT BASED ON 1% INCREMENTS ACCORDING TO COLOUR CODE KEY ON PAGE 2 & 3.

Dr Nana Bortsie-Aryee  
Program Director

David Baggs  
Chief Executive Officer

# Verification Methodology

## 1.0 Scope

The Global GreenTag's Modern Slavery Product Declaration is a facilitation service designed to provide the subject company with an additional level of robustness to their declaration in compliance with Modern Slavery Acts that:

- Provides a third party verified Modern Slavery assessment of product supply chains to the extent possible;
- Provides assessment transparency and gives a quick evaluation overview;
- Uses simple easy to understand colour keys to explain risks;
- Identifies Modern Slavery risks and how they are mitigated (or not);
- Promotes and recognises manufacturers and suppliers willing to be 100% transparent as the Leaders they are;
- Provides plain language explanations of any recognised or assumed Modern Slavery in the supply chain;
- Provides guidance on the 'level of reliability' attached to risk assessments undertaken from 'onsite audit' to 'research based' verification;
- Provides reporting suitable for aggregating into company level reports for companies caught by relevant Acts, especially for companies with large procurement portfolios and mandatory legislative reporting requirements.

The GreenTag MSD is ultimately the subject Company's Modern Slavery declaration on their product Supply chain and is declared as such by a competent public officers of the subject company.

## 2.0 Preparing a MSD

GGT MSD is prepared after reviewing numerous documents including, but not limited to, the Australian Government's guidance for reporting entities, UK Modern Slavery Act, QLD HRA, Australian Council of Superannuation Investors' (ACSI) Modern Slavery Risks, Rights & Responsibilities, and ETI and ERGON's Managing Risks Associated with Modern Slavery: A Good Practice Not for the Private Sector. Verifications are undertaken by GGT Qualified Exemplar Global Lead Auditors and are reviewed by both the GGT Program Director (also a Qualified Exemplar Global Lead Auditor) and the subject Company's Executive Management.

## 3.0 Assessment

Global GreenTag will map product supply chain and collect evidence from the supply chain to the extent possible. Company and its suppliers are requested to submit their procurement policies, quality statements, corporate policies, employment policies and contracts, Non-conformance registers, Human Resource policies, Modern Slavery policy, etc. These documents are reviewed and an explanation on any identified MS issues is requested from company/supplier. Based on the information and further evidence received from Company and its suppliers, Global GreenTag will verify each supplier and determine their compliance to MS from 'Low Risk' to 'Undetermined Risk', see table 1 for 5 scale code. The data quality of the supply chain assessment will be classified from 'Onsite audit' to 'No data available or Obscure Supply Chain', see table 2

**Table 1: MS Risk Assessment of Supply Chains**

Risk Identified	Colour
Best Practice Performance - Supplier has really strong policies in place to avoid Modern Slavery and reports transparently on any non-conformances. Suppliers have demonstrated history of strong positive performance outcomes achieved. Improvement on a previously non-compliant situation or the absence of negative impacts are not regarded as positive impacts.	+2
Low Risk - Supplier has strong policies in place to avoid Modern Slavery and reports transparently on any non-conformances. Improvement on a previously non-compliant situation or the absence of negative impacts are not regarded as positive impacts.	+1
Compliance - Supplier have no conflicting policies related to Modern Slavery. Suppliers are compliant to local laws and international ILO core 8 conventions. Any identified 'Modern Slavery non-conformances'* has been actioned and are committed to put stronger policies in place.	0
Medium Risk - Suppliers have commitment to avoid Modern Slavery. The identified local law non-conformances has been actioned and are committed to put stronger policies in place. The policies are improving.	-1
High Risk - Suppliers identified with conflicting Modern Slavery policies in place and has high risk of potential MS activities or identified MS activities without any further actions to prevent it. Identified non-conformance to local law or MS without any actions to improve the situation.	-2
Undetermined Risk (Risk Indeterminable) - No or insufficient data to conclusively determine Modern Slavery	-2

**Table 2: Data Quality of Supply Chain Assessment**

Criteria	Data Source		Timeliness	Representativeness
	Primary Data	Secondary Data		
+2	Audit – Onsite	Report from well-established, well-documented reliable sources	Data from current period	Data directly from the company/ source/ supplier
+1	Audited – Desktop. Statutory declarations with supporting documents as evidence	Report from a well-established, well-documented reliable source	Data from previous year	Data from other sites of the company in same region
0	Statutory declarations cross-checked with region based research/ secondary reports	Independent but similar claims made by various sources	Data from 2 years ago	Data from other sites of the company in other regions
-1	Research based data	Research based data. Unverifiable claims found on websites, twitter, social media, etc	Data from 3 years ago	Data from other companies in same region/ area/ production conditions
-2	No data available or Obscure supply chain. Assumption based	No data available or obscure supply chain. Assumption based	Timeline unknown or more than 3 years ago	Average country data / average industry data / data from third parties

Above tables 1 and 2 are adapted and adopted from Social LCA methodology.

## Executive Summary

### Tier 1 (Direct) Suppliers

2 Tier 1 Suppliers out of 4 have publicly available policies addressing modern slavery and are externally audited for the fundamental ILO conventions. 1 supplier had a code of conduct that specifically address modern slavery. For the remaining 1 supplier for which no information was found, assumptions were made based on the geographical location of the supplier and similar companies within the region.

3 Tier 1 Suppliers out of 4 have publicly available policies regarding discrimination but only 2 can provide evidence of compliance. For the 1 remaining supplier assumptions were made based on the geographical location of the supplier and similar companies within the region.

3 Tier 1 Suppliers have policies addressing freedom of association and collective bargaining rights but only 2 of these recognise collective bargaining in negotiations. For the 1 remaining suppliers, assumptions were made based on the geographical location of the supplier and similar companies within the region.

3 Tier 1 Suppliers out of 4 have publicly available policies regarding equal remuneration but only two have transparent pay scales and provide evidence of a living wage. For the 1 remaining suppliers, assumptions were made based on the geographical location of the supplier and similar companies within the region.

### Tier 2+ (Indirect) Suppliers

Both wood suppliers have a PEFC Chain of Custody certification on the provided products. This includes an audit of suppliers and requires the Fundamental ILO conventions to be followed and are considered not a risk. The two primer suppliers were identified however no relevant information was found on them. No additional information was found on the beeswax and screw tear 2 suppliers.

### Actions Taken as a result of investigations:

#### High Priority Tasks

- Obtain data and documentation from Tier 1 Suppliers for which no data was available on forced labour, trafficking in persons, servitude, debt bondage, deceptive recruiting labour or services, worst forms of child labour.
- Obtain data and documentation from Tier 1 Suppliers for which no data was available on discrimination, equal remuneration, freedom of association and collective bargaining.

### Whistleblower Provisions? No

GGT disclaimer: As required by various legislation this document constitutes risk assessment and as such does not guarantee that Modern Slavery does not occur in the supply chains described herein. It is issued in good faith and is determined to be as accurate as possible at the date of issuance and is part of a continuous improvement and reporting process and will vary overtime with ongoing consultancy with supply chain.

Global GreenTag provides supply chain verification and research services for manufacturers providing product level declaration for customers asked to provide responses to MS Act & QLD Human Rights. GGT MSD document is a product level declaration.

The document is owned by the subject company. The IP inherent in the document is owned exclusively by Global GreenTag International Pty Ltd.

As a product level statement, this document is issued in support of those companies undertaking required or voluntary Modern Slavery reporting or publication.

### Table 3: Applicant and Manufacturer: Bird Habitats

#### 3.1 Assessment for Slavery (including deceptive recruiting for labour or services, trafficking in persons, servitude, forced labour, forced marriage and Debt bondage).

Component	Assessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Applicant and Manufacturer	100%	Y	+1 The company has a Modern Slavery Policy and a PDCA system in place.	+1.66 Current primary data directly from the company.	Y

#### 3.2 Assessment for Child Labour

Component	Assessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Applicant and Manufacturer	100%	Y	+1 The company has a Modern Slavery Policy and a PDCA system in place.	+1.66 Current primary data directly from the company.	Y

#### 3.3 Assessment for Discrimination

Component	Assessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Applicant and Manufacturer	100%	Y	0 The company has a Non-Discrimination Policy in place.	+1.66 Current primary data directly from the company.	Y

#### 3.4 Assessment for Equal Remuneration

Component	Assessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Applicant and Manufacturer	100%	Y	+1 The company has a Non-Discrimination Policy in place which includes equal remuneration and a living wage.	+1.66 Current primary data directly from the company.	Y

#### 3.5 Assessment for Freedom of Association

Component	Assessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Applicant and Manufacturer	100%	Y	+1 The company has a freedom of association policy that recognises collective representation.	+1.66 Current primary data directly from the company.	Y

Table 4: DIRECT SUPPLIERS: Thermal Haven Nest Boxes®

4.1 Assessment for Slavery (including deceptive recruiting for labour or services, trafficking in persons, servitude, forced labour, forced marriage and Debt bondage).

Component	No. of Suppliers	As-sessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Engineered Wood Panels	1	100%	Y	+1 The company has a PDCA system based policy publicly available. Operates in country that has ratified this ILO convention. Audited externally for PEFC chain of custody compliance.	+1.66 Current primary data directly from the company.	Y
Hardwood Guard and Corners	1	100%	Y	+1 The company has a policy publicly available. Operates in country that has ratified this ILO convention. Audited externally for PEFC chain of custody compliance.	+1.66 Current secondary data from ILO and verified through desktop research.	Y
Screws	1	100%	Y	0 The company has a policy publicly available. Operates in country that has ratified this ILO convention.	+1.00 Current secondary data from ILO and verified through desktop research.	Y
Beeswax	1	100%	Y	0 The company operates in country that has ratified this ILO convention. Similar companies in the area have found low risk of slavery.	-0.33 1 year old research based data using region based information.	Pending

4.2 Assessment for Child Labour

Component	No. of Suppliers	As-sessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Engineered Wood Panels	1	100%	Y	+1 The company has a PDCA system based policy publicly available. Operates in country that has ratified this ILO convention. Audited externally for PEFC chain of custody compliance.	+1.66 Current primary data directly from the company and reliable secondary sources.	Y
Hardwood Guard and Corners	1	100%	Y	+1 The company has a policy publicly available. Operates in country that has ratified this ILO convention. Audited externally for PEFC chain of custody compliance.	+1.66 Current secondary data from ILO and verified through desktop research	Y
Screws	1	100%	Y	0 The company has a policy publicly available. Operates in country that has ratified this ILO convention.	+1.00 Current secondary data from ILO and verified through desktop research	Y
Beeswax	1	100%	Y	0 The company operates in country that has ratified this ILO convention. Similar companies in the area have found low risk of slavery.	-0.33 1 year old research based data using region based information.	Pending

### 4.3 Assessment for Discrimination

Component	No. of Suppliers	As-sessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/goals
Engineered Wood Panels	1	100%	Y	+1 The company has a PDCA system based policy publicly available. Operates in country that has ratified this ILO convention. Audited externally for PEFC chain of custody compliance.	+1.66 Current primary data directly from the company and reliable secondary sources.	Y
Hardwood Guard and Corners	1	100%	Y	+1 The company has a policy publicly available. Operates in country that has ratified this ILO convention. Audited externally for PEFC chain of custody compliance.	+1.66 Current secondary data from ILO and verified through desktop research.	Y
Screws	1	100%	Y	0 The company has a policy publicly available. Operates in country that has ratified this ILO convention.	+1.00 Current secondary data from ILO and verified through desktop research.	Y
Beeswax	1	100%	Y	0 The company operates in country that has ratified this ILO convention. Similar companies in the area have found low risk of discrimination.	-0.33 1 year old research based data using region based information.	Pending

### 4.4 Assessment for Freedom of Association

Component	No. of Suppliers	As-sessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/goals
Engineered Wood Panels	1	100%	Y	+1 The company has an Enterprise Agreement in place that recognises the collective representation of organised workers. Operates in country that has ratified this ILO convention. Audited externally for PEFC chain of custody compliance.	+1.66 Current primary data directly from the company and reliable secondary sources.	Y
Hardwood Guard and Corners	1	100%	Y	+1 The company has an Enterprise Agreement in place that recognises the collective representation of organised workers. Operates in country that has ratified this ILO convention. Audited externally for PEFC chain of custody compliance.	+1.66 Current secondary data from ILO and verified through desktop research.	Y
Screws	1	100%	Y	0 The company has a policy publicly available. Operates in country that has ratified this ILO convention.	+1.00 Current secondary data from ILO and verified through desktop research.	Y
Beeswax	1	100%	Y	0 The company operates in country that has ratified this ILO convention. Similar companies in the area recognise collective bargaining.	-0.33 1 year old research based data using region based information.	Pending

## 4.5 Assessment for Equal Remuneration

Component	No. of Suppliers	As-sessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/goals
Engineered Wood Panels	1	100%	Y	+2 The company has an Enterprise Agreement in place with transparent pays scales and remuneration criteria.	+1.66 Current primary data directly from the company and reliable secondary sources.	Y
Hardwood Guard and Corners	1	100%	Y	+2 The company has an Enterprise Agreement in place with transparent pays scales and remuneration criteria.	+1.66 Current secondary data from ILO and verified through desktop research	Y
Screws	1	100%	Y	0 The company has a policy publicly available. Operates in country that has ratified this ILO convention.	+1.00 Current secondary data from ILO and verified through desktop research	Y
Beeswax	1	100%	Y	0 The company operates in country that has ratified this ILO convention.	-0.33 1 year old research based data using region based information.	Pending

### Limitations & Uncertainties:

Teir 2 suppliers were excluded mainly due to:

- Lack of data
- The majority of these suppliers are for wood components which are already risk assessed for the Mandatory ILO compliance.