



SOUTHERN STAR
Group of Companies



Modern Slavery and Human Rights Statement FY2020

Modern slavery includes the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage. Source: Walk Free Foundation.

Suppliers is defined as factories, supplier sites and providers of goods or services to Southern Star Group and its business units.

Operations is defined as activity controlled by Southern Star Group and its business units.

Supply chains is defined as suppliers and service providers to Southern Star Group and its business units.

This statement is made pursuant to the Australian Modern Slavery Act 2018.

REPORTING ENTITY

This statement relates to the Southern Star Group of Companies. The Southern Star Group comprises SOUTHERN STAR WINDOWS Pty Ltd (ACN 100 012 431), SOUTHERN STAR WINDOWS (NSW) Pty Ltd (ACN 146 905 106), SOUTHERN STAR WINDOWS (QLD) Pty Ltd (ACN146 913 402), SOUTHERN STAR GLASS Pty Ltd (ACN 137 012 134) and AURORA AUSTRALIS HOLDINGS PTY LTD (ACN 130 653 575) trading as Canterbury Windows and Doors and Homeview Windows and Doors

BUSINESS OVERVIEW

THE Southern Star Group of companies is a privately owned, Australian manufacturer that specialises in the design, manufacture and distribution of a range of timber and aluminium window and door systems to the Australian domestic housing market. With 8 branches across the east coast and South Australia, the Group employs approximate 650 people.

SUPPLY CHAINS

The majority of our procurement is through Australian suppliers with a lesser percentage of goods purchased through suppliers in China and Malaysia. Our procurement items relate to materials for the manufacture of windows and doors in both timber and aluminium. Core items include aluminium extrusion, timber, glass and powder coat. Other small items include associated hardware and locks for windows and doors, and a variety of other components required for the manufacturing process.



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RISK ASSESSMENT AND MANAGEMENT OF MODERN SLAVERY INCLUDING IN SUPPLY CHAINS

The Southern Star Group has recently developed and implemented a Modern Slavery and Human Rights Policy which is applicable to each of its business units.



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PURPOSE OF THE POLICY

The Australian Modern Slavery Act 2018 took effect on 1 January 2019 and requires business to make annual public reports (Modern Slavery Statements) on the actions of its operational departments to address modern slavery risks in their operations and supply chains. The purpose of this Policy is to ensure that the Southern Star Group of Companies:

- is compliant with local, national and other applicable laws and regulations in the areas in which its businesses operate;
- sources products and services in accordance with legal obligations and community expectations while working with suppliers to improve their social and environmental practices;
- act to prevent, mitigate and where appropriate, remedy modern slavery in their operations and supply chains.

Business plays an important role in respecting and promoting human rights and eradicating modern slavery. We recognise that modern slavery is a growing and complex problem, best tackled by collective commitment and responsibility to bring it to an end, and we are committed to working with all our stakeholders to fulfil this common goal.

If the policy is breached, we will act as quickly as practicable to remedy our adverse impacts on workers, individuals or communities and we will engage directly with affected stakeholders.

POLICY APPLICATION

The principles of this policy must be complied with or incorporated into policies within the Head Office, business unit as applicable.

POLICY

- a) Each branch and/or business unit must adopt policies and procedures to ensure that it is addressing modern slavery and ethical sourcing risks in its operations and supply chains in a way that is appropriate for the relevant branch and/or business unit.
- b) Each business unit must, as far as practicable, include in its operational and supplier contract terms, requirements that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate.
- c) Each business unit must, as far as practicable, use in its operational and supplier contract terms requirements that suppliers:
 - i. comply with the Minimum Standards set out in Annexure A (Minimum Standards);
 - ii. provide the business unit with rights of termination if the supplier is unable or unwilling to work towards full compliance with the Minimum Standards.



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- d) As far as practicable, suppliers must be:
- i. encouraged to exceed the Minimum Standards set out in Annexure B, and promote best practice and continuous improvement; and
 - ii. monitored for compliance with the Minimum Standards through supplier assessment processes as appropriate for the business unit, taking into account all relevant risk factors such as country risk and product risk.



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- e) Each business unit must monitor and review the effectiveness of the policies and procedures referred to in paragraph (a) above, taking into account their suitability, adequacy and effectiveness as per the risk assessment.
- f) Each business unit must implement an approach to modern slavery risk management in accordance with the guidelines in Annexure B.

POLICY AMENDMENT

This policy cannot be amended without approval of the Senior Management Team of the Southern Star Group. The Senior Management Team of the Southern Star Group is responsible for oversight of the company's ethical sourcing and modern slavery commitments and will review this policy regularly to ensure it continues to evolve and reflect community expectations.

This Statement has been approved by the board of management of the Southern Star Group of companies

Paul Gray
Managing Director
29th March 2021

ANNEXURES:

Annexure A – Modern Slavery Risk Management for Each Business Unit

Annexure B – Minimum Standards Expected of Suppliers

Annexure C- Supplier Modern Slavery Questionnaire



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ANNEXURE A – MODERN SLAVERY RISK MANAGEMENT FOR EACH BUSINESS UNIT

'Tier 1 suppliers' are defined as those suppliers that supply goods or services directly to the business unit.

Minimum Standards

- 1. Accountability for modern slavery issues, with an identified risk owner**
Business units acknowledge that they are accountable for addressing modern slavery issues in operations and supplier contracts and will nominate a specified individual or role to be responsible for co-ordinating management of this risk.
- 2. Supply chain mapping and risk assessment**
Business units must assess the risks of modern slavery across their operations. The risk assessment must initially address the modern slavery risks of tier 1 suppliers and then assess those suppliers beyond tier 1 who are determined by the business unit to be high risk.
- 3. On-boarding and contracting**
Business units must perform due diligence on new suppliers to determine their risk level and control procedures in relation to ethical sourcing and modern slavery as appropriate for its business. The business unit must have a process in place to consider the supplier's ethical sourcing and modern slavery performance during the supplier on-boarding.
- 4. Audit and compliance program**
Business units must assess suppliers through their audit/compliance program to confirm compliance with this policy. The business unit should involve relevant personnel or external providers trained in conducting audits when required.
- 5. Training**
Business units must ensure that team members with relevant roles in relation to the policy receive adequate training on the policy and any supporting processes applicable to their role.
- 6. Complaints mechanism**
Business units must have an accessible and well-publicised reporting mechanism for concerns or disclosure in relation to modern slavery which allows for confidential and anonymous reporting and provides protection from reprisal. There must be clear processes for investigating and reporting on the issues raised through the reporting mechanism.



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7. Remediation

Business units must be committed to working with suppliers to remediate any breaches of this policy.

8. Stakeholder engagement

Business units must have an approach to stakeholder engagement in place.

9. Review

Business units must monitor and annually review the effectiveness of the risk management measures described above.



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ANNEXURE B – MINIMUM STANDARDS EXPECTED OF SUPPLIERS

Child labour is defined as any work by a child or young person, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to interfere with that person's education, or to be harmful to that person's health or mental, spiritual, moral or social development. *Child (or Children)* is defined as a person under the age of 15, or below the age at which school attendance is not compulsory under local law, whichever is older.

Young Person is defined as a person under the age of 18 but not classified as a child.

Principles of remediation is defined as a program enabling children and underage workers to return to quality education and establish and implement effective systems to prevent the use of child labour in the future.

The Minimum Standards set out below are prepared with reference to, and should be read in conjunction with, the Southern Star Group Supplier Code of Conduct.

Minimum Standards

1. No forced or bonded labour

Employment shall be freely chosen. Suppliers shall:

- a) not use any type of forced labour (any work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person), bonded labour (work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange) or indentured labour (in which an employer forbids workers from leaving employment at the worker's discretion);
- b) respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment; and
- c) ensure that workers are free to leave their employer after reasonable notice.

2. No child labour

Suppliers shall comply with the minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (ILO) Convention 138. Suppliers must be able to verify the age of all employees to ensure compliance. Suppliers must accept the principles of remediation of child and underage workers, and where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.



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3. Wages, benefits, and transparent record keeping

Suppliers must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits. Record keeping must be accurate and transparent. Workers must be provided with written and understandable information about their employment conditions before they enter employment and about their wages for each pay period. Deductions from wages for disciplinary measures or any deductions from wages not provided for by law shall not occur without the express permission of the worker concerned. All disciplinary measures should be recorded.

4. Working hours

Working hours must comply with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable ILO convention. Overtime shall be agreed, shall not be excessive, shall not be requested on a regular basis and shall be compensated as prescribed by applicable local laws.

5. No discrimination

All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation. Suppliers must ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.

6. No harassment or abuse

Workers shall be treated with dignity and respect. In particular, suppliers will provide a workplace free from harassment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.

7. Freedom of association, grievance mechanisms and recourse

Suppliers shall respect the rights of workers to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country of operation. Workers should have the right to join or form trade unions of their choosing. Suppliers should not interfere with, obstruct or prevent legitimate related activities, such as collective bargaining. Workers are allowed to select worker representatives. Representatives should not be discriminated against and should have regular access to company management or appropriate process in order to address grievances and other issues. Suppliers must have a policy in place for workers to approach management on issues of concern, on their own or through worker representatives, confidentially.



8. Working conditions

Suppliers shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied, and workers trained in their use. Where suppliers provide accommodation it shall be clean, safe and meet the basic needs of workers. Workers will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation. Workers have the right to refuse work that is unsafe.

9. No bribery

Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise. Suppliers shall keep accurate records of all payments made and received in cash or in kind, for audit purposes.

10. Sub-contracting

Where sub-contracting is permitted, suppliers must have adequate processes in place for properly managing sub-contracting to ensure that subcontractors operate in accordance with this and any applicable business unit policy and is undertaken strictly in accordance with the contract.

11. Environmental compliance

Suppliers shall comply with relevant local and national environmental protection laws and will as far as practicable comply with international environmental protection standards.

11 Migrant workers

Migrant workers shall have the same entitlements as local workers as stipulated by local law. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer. The employer must not require the worker to surrender identification documents. Workers employed through a third-party agent or contractors are the responsibility of the suppliers and are thus covered by these Minimum Standards.

12 Hiring and regular employment

Suppliers must provide each worker with a clear, understandable labour contract containing all legally required employment terms, entitlements and conditions. In addition, where possible, suppliers should work towards providing permanent employment for workers and avoid labour-only contracting arrangements, consecutive short-term contracts, excessive piece-work or false apprenticeship schemes to avoid obligations of regular employment to workers.



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Supplier Modern Slavery Questionnaire

Background

The Southern Star Group significantly values good corporate governance, as well as compliance with laws, regulations and ethical practices.

The Modern Slavery Act 2018 (Cth) requires the Southern Star Group to assess and address the risks of modern slavery in its operations and supply chains. In doing so, the following questionnaire has been put together for our vendors.

Modern slavery is a significant concern and broadly, incorporates any circumstance of exploitation, including, but not limited to, slavery, servitude, forced labour, child labour, human trafficking, abuse of power, threats, withholding of wages and deprivation of freedom.

Should you have any questions around the questionnaire, please contact info@windowsanddoors.build.

To learn more about the 2018 Modern Slavery Act (Cth), please visit: <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>

Your Organisation

1. Your organisation's name: _____
2. Your organisation's ABN: _____
3. Your organisation's operating location/s (please include countries and states) _____
4. Your full name: _____
5. Your position/title: _____
6. Total number of employees: _____
7. Total number of contractors/non-employee workers: _____

8. What is your organisation and its controlled entities' consolidated turnover	Y	N
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Modern Slavery Within Your Organisation

- | | | |
|---|---|---|
| 9. Is your organisation aware of the Modern Slavery Act 2018? | Y | N |
| 10a Is your organisation required by the Modern Slavery Act 2018 to prepare an annual statement describing, amongst other requirements, the steps it has taken to assess and mitigate modern slavery risks within its operations and supply chains? | Y | N |



Please see link below for further information: <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>

10b	If so, has this been completed?	Y	N
11.	Does your organisation have its own Modern Slavery Act compliance policy/procedures? If so, please describe below:	Y	N
12.	Are your organisation's employees or contract workers free to lawfully resign their employment without restriction or penalty?	Y	N
13.	Are workers paid their legal pay entitlements, on time and provided with pay slips clearly showing how wages have been calculated and details of any deductions?	Y	N
14.	Does your organisation require its employees or contract workers to lodge deposits of money, or 'security deposits', which could involve financial or personal property?	Y	N
15.	Does your organisation retain any original identity papers or documents of its employees or contract workers (e.g. passports, birth certificates, national identity cards etc.)?	Y	N
16.	Does your organisation deduct wages, impose monetary fines, and/or withhold pay or pay entitlements of workers as fines or penalties for misconduct or poor production/performance?	Y	N
17.	Does your organisation undertake checks to ensure all employees and workers are above the minimum age for work?	Y	N
18.	Are all workers provided with a written contract in a language they understand, where terms of employment including wage rates and hours of work are clear?	Y	N
19.	Where accommodation is provided to workers (for example, dormitories, hostels or other forms of shared accommodation), are regular checks conducted to ensure that the living conditions are adequate and meet legal requirements? N/A For example, fire safety, space, temperature, lighting, sanitary facilities, privacy, ventilation.	Y	N
20.	Where accommodation is provided, are workers free to leave at their own will? N/A	Y	N
21.	Do workers have mechanisms to anonymously raise concerns related to any potential modern slavery practices identified?	Y	N
22a.	Have you become aware of any slavery, servitude, forced or compulsory labour, human trafficking or other forms of modern slavery within your business? If yes, please describe,	Y	N
22b.	If yes to 22a, has your business taken action to address these? If yes, please describe.	Y	N

Supply Chain Management for Modern Slavery

23.	Does your organisation undertake due diligence to assess whether slavery, servitude, forced or compulsory labour, human trafficking or other forms of modern slavery exist in your supply chain or with any of your vendors? If so, please describe below:	Y	N
24.	Does your organisation require your suppliers to conduct modern slavery due diligence for their suppliers? If so, please describe below:	Y	N
25b.	If yes to 25a, has your business ceased using any suppliers involved?	Y	N



Declaration

26. I declare that I am duly authorised to make representations on behalf of the organisation and that the information provided here is true, complete and correct.

Note: If you become aware of any changes to the answers provided in this survey after the date of signing, please promptly notify your procurement representative.

Name (Please Print):

Job Title:

Signature:

Date:

