

MODERN SLAVERY STATEMENT

Last updated: August 2024



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INTRODUCTION

This statement is submitted by United Fasteners Australia Pty. Ltd. ACN 078 443 311 (United Fasteners) under the Modern Slavery Act 2018 (the Act) for the reporting period between 1st July 2023 and 30th June 2024. This statement outlines the risks of modern slavery, and actions to address those risks. Unless otherwise specified, references to “United Fasteners”, “we”, “us” or “our” refers to United Fasteners Australia Pty. Ltd., and their controlled subsidiaries and branches as defined in the Act.

United Fasteners does not tolerate modern slavery, servitude, human trafficking, forced labour, child labour, bonded labour, forced marriage and deceptive recruiting. We are committed to acting ethically, with integrity and transparency in all our business dealings and relationships and are committed to preventing modern slavery in our own business and to helping prevent modern slavery in our supply chains.

United Fasteners is committed to respecting the human rights of all people including our employees, communities where we operate, and those in our supply chain. United Fasteners is committed to ensuring, so far as is reasonably practicable, products and services are procured and delivered ethically, which includes evaluating and engaging our suppliers.



STRUCTURE, OPERATIONS, & SUPPLY CHAINS

Our structure

United Fasteners is a family owned, Australian independent company. Headquartered in Sydney, Australia, United Fasteners Australia Pty. Ltd. owns and controls the following entities:

- a) United Fasteners SA Pty. Ltd. ACN 105 321 220
- b) United Fasteners QLD Pty. Ltd. ACN 088 483 863
- c) United Fasteners VIC Pty. Ltd. ACN 112 716 499
- d) United Fasteners WA Pty. Ltd. ACN 105 321 211
- e) United Fasteners NSW Pty. Ltd. ACN 610 297 624

Our group of entities (as per the company structure listed above) has an annual consolidated revenue of over \$100m across the reporting period, therefore meeting the Act's definition of a reporting entity.

In the reporting year, we directly employed just over 300 technical experts and solution focused individuals, with in-depth product knowledge and sourcing experience across fastening products and industrial supplies.

Our operation

Established in 2001, United Fasteners is Australia's largest independent distributor of fastening products and industrial supplies.

We stock over 75,000 product SKUs, sourced from over 500 trusted suppliers. We source and supply a comprehensive range of products, including fasteners, fixings, and industrial supplies. Our mission is to supply quality assured products, at competitive prices, from knowledgeable technical experts, effectively, efficiently and with the best reliability in the market. Our stock holdings are over \$25m to ensure we have what our clients need.

We have developed bespoke service packages (*U-SUPPORT* and *U-STOCK*), which help increase efficiencies and reliabilities. We provide Inventory Management solutions and the necessary technical support from project design to project implementation.

All United Fasteners entities perform the same activities as the parent entity within Australia. Our head office is located at Suite 501, 45 Lime Street, Sydney, NSW 2000 (Ph 02 9262 2250).

Our national footprint covers 13 branches across Australia in the following locations:

- 1) **Sydney** (02 8316 6500)
Unit C, 2/4 Blue Metal Rd, Eastern Creek, NSW 2766
- 2) **Canberra** (02 9131 3366)
134-136 Gladstone Street, Fyshwick, ACT 2609
- 3) **Wagga Wagga** (02 9131 3333)
Unit 2, 3 Ball Place, Wagga Wagga, NSW 2650
- 4) **Albury** (02 6023 5171)
274 Townsend Street, South Albury, NSW 2640
- 5) **Albury** (02 6060 2500)
397 Wagga Road, Lavington, NSW 2641
- 6) **Melbourne** (03 8549 9888)
225 Atlantic Drive, Keysborough, VIC 3173
- 7) **Melbourne** (03 9089 7300)
121 Yale Drive, Epping, VIC 3076
- 8) **Brisbane** (07 3375 7011)
3/679 Boundary Road, Richlands, QLD 4077
- 9) **Gladstone** (07 4972 9414)
17 Beckinsale Street, Gladstone, QLD 4680
- 10) **Mackay** (07 4952 1977)
5 Progress Drive, Paget, QLD 4740
- 11) **Adelaide** (08 8360 4622)
218 Cormack Road, Wingfield, SA 5013
- 12) **Adelaide** (08 8360 4622)
1 Marion Street, Melrose Park, SA 5039
- 13) **Perth** (08 9333 2600)
126 Pilbara Street, Welshpool, WA 6106

Our national presence is combined with our on-the road and phone-based sales teams, enabling us to meet the needs of our customers regardless of location.

We also service South East Asia and the Western Pacific.



Our supply chain

Our supply chains include over 500 suppliers to source a wide range of fasteners, fixings and industrial supplies. The largest category of supplier spend during the reporting period was on our national suppliers as we strive to source locally whenever possible.

Examples of our products sourced include fasteners and fixings, abrasives, cutting tools, sealants, adhesives, lubricants, hand tools, safety, construction chemicals, materials handling, petrochemical, special manufacture, and packaging supplies.

Examples of services procured include freight/courier, waste service providers, building maintenance and office cleaning services.

A small fraction of products used by our entities are sourced from overseas. In the main, United Fasteners source 90% of goods and services nationally and 10% internationally from the United Kingdom, Germany, France, Japan, China, India, Taiwan, South Korea, and Vietnam.



Supply chain map



RISKS OF MODERN SLAVERY PRACTICES

Risks of modern slavery practices in the operations & supply chains of the reporting entity (and any entities it owns or controls)

Given the highly regulated nature of the market in Australia for our organisation's size, the risk of modern slavery employment within United Fasteners is considered to be low. Modern slavery risk is mitigated through our compliance with national wage laws closely managed by our dedicated HR manager, the adherence to industrial policies and procedures, and the provision of grievance mechanisms for all employees to safely raise concerns.

There is a variable degree of modern slavery risk throughout our supply chains, and we acknowledge that risks associated with the procurement of goods and services exist in our supply chain.

We recognise the risk associated with national and international suppliers operating and sourcing from countries with a high prevalence of modern slavery, such as China and India. The countries are at risk of forced labour, particularly at risk for state-imposed forced labour and when workers are provided with accommodation. The traceability of the global supply chain is a shared concern. Within our national supply chain, we have also identified that our local cleaning and maintenance service suppliers and our local couriers with sub-contractors pose the highest exposure to modern slavery.

The following risks have been identified that could potentially 'cause' modern slavery practices:

- a) directly engaging foreign workers, or unskilled, or temporary or seasonal labour to work in warehousing, and
- b) using recruitment agencies.

The following risks have been identified that could potentially 'contribute' modern slavery practices:

- a) obtaining cheaper supplies through competitive procurement, and
- b) setting unrealistic delivery time frames to suppliers.

The following risks have been identified that could potentially be 'directly linked to' modern slavery practices:

- a) sourcing products from national and international suppliers that have operations or directly source from countries that have a high prevalence of modern slavery, such as China and India,
- b) sourcing products which may have been manufactured by another entity that have sourced minerals, such as rubber, cobalt, zinc, copper, manganese, and nickel by another entity using forced labour,
- c) informally engaging local service providers for cleaning and maintenance services, and;
- d) engaging local courier suppliers that may be using subcontractors that are foreign workers, or unskilled, or temporary or seasonal labour.

Potential modern slavery risks by country

Country	Total child labour	Risk of forced labour	Overall risk of corruption	Risk that Country does not provide adequate labour laws	Risk of Wages being under \$2 per day
Australia					
United Kingdom					
Germany					
France					
Japan					
South Korea					
China					
India					
Taiwan					
Vietnam					

Source: Social Hotspot Database (SHDB)

 Least Risk  Moderate Risk  High Risk  Very high Risk  Not assessed

ACTIONS TAKEN BY THE REPORTING ENTITY

Actions taken by the reporting entity (and any entities it owns or controls) to assess and address these risks, including due diligence and remediation processes

United Fasteners employs staff in accordance with the laws of Australia and the laws of each State in which we operate. United Fasteners strives to achieve best practice and regularly consults with our supply chain, along with regular site visits both in Australia and overseas.

We have identified potential risks based on the geography, industry, and product and services for our top Australian-based suppliers, international suppliers by spend, and perceived high-risk suppliers. We have engaged our key national and internal suppliers and service providers through a Modern Slavery Questionnaire to help us understand the risk of modern slavery in our supply chains. We have also identified preliminary modern slavery risks in our supply chains, referring to the Social Hotspot Database and Global Slavery Index.

A Modern Slavery Policy has been introduced to complement our existing Health and Safety Policy, Environment Policy, Ethical Sourcing Policy, Traditional Custodians of the Land and Indigenous Policy. The policy outlines our commitment, responsibility, and actions to prevent, detect and report on modern slavery in our operations and supply chains and will be regularly reviewed and updated as required. Communication, awareness, and training are an integral part of the policy development. We integrate our Modern Slavery Policy into our induction process and training procedures for all employees.

United Fasteners is not aware of any incidents of modern slavery in its operations or supply chains throughout the reporting period. If any issues are identified, we will conduct an investigation, and determine remediation actions. Our grievance mechanisms, alongside our internal policies and reporting structures, require employees to raise concerns and notify management about any issue or suspicion of modern slavery in our operations or supply chains.



ASSESSMENT OF THESE ACTIONS

How the reporting entity assesses the effectiveness of these actions

To assess the effectiveness of actions taken, we will communicate, train, and raise awareness about modern slavery among all our employees. We will continue engaging directly with suppliers with the modern slavery questionnaire, to gain a proper understanding of their measures in place and work to ensure that modern slavery is not occurring within their own businesses, review their progress and monitor actions. This includes reviewing the appropriateness of modern slavery questions and engagement with suppliers. We will also identify and determine the processes to operationalise our Modern Slavery Policy and questionnaire in our procurement process.

United Fasteners will also review modern slavery risks and remediation actions in our operations and supply chains annually; this includes an annual management review of our response to modern slavery.

Addressing the risk of modern slavery is complex, therefore United Fasteners is committed to continuous improvement so that our processes and interventions remain effective in preventing and remediating modern slavery in our operations and supply chains.

PROCESS OF CONSULTATION

Process of consultation with any entities the reporting entity owns or controls

In preparing this statement, United Fasteners has engaged relevant management across our business to identify modern slavery risks in our operations and supply chains as appropriate.

This modern slavery statement was approved by the board of United Fasteners Australia Pty Ltd on 30th June 2024.





For more information about
any of our policies, please email:
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Fasteners