



## ***The TradeTools Group***

### ***Modern Slavery Statement***

***Reporting Period: 1 January 2025 to 31 December 2025***

## **1. Introduction**

*Founded in 1987 and headquartered on the Gold Coast, TradeTools is a successful and progressive privately owned Queensland company. We have a long and proud history of supplying high-quality industrial tools and equipment to tradespeople, apprentices, businesses, and industries – those who form the backbone of Australia.*

*This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 and outlines the actions taken by the TradeTools Group during the reporting period 1 January 2025 to 31 December 2025 to identify, assess, and address modern slavery risks in our operations and supply chains.*

*This statement is submitted as a joint declaration on behalf of all entities within the TradeTools Group. In this statement, we:*

- 1. Identify the reporting entities covered;*
- 2. Describe our structure, operations, and supply chains;*
- 3. Identify risks of modern slavery in our operations and supply chains;*
- 4. Describe the actions taken to assess and address those risks;*
- 5. Explain how we assess the effectiveness of those actions; and*
- 6. Describe consultation processes undertaken within the Group.*

*The TradeTools Group has zero tolerance for modern slavery in any form.*

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## **2. Reporting Entities and Governance**

### **Reporting Entities**

*This statement covers:*

- TradeTools Pty Ltd (ACN 010 700 053), including its manufacturing operations*
- ToolBrokers (ACN 060 285 976)*

*For the purposes of this statement, “TradeTools Group”, “Group”, “we”, “us”, or “our” refers to these entities and their controlled operations. TT Diner is not included in this report.*

### **Governance Structure**

*The Board of Directors is comprised solely of Executive Directors with operational responsibilities, together with our founding Chairman.*

*The Board of TradeTools and the Boards of its subsidiaries are responsible for oversight of the Group’s approach to modern slavery risk management. Directors and senior management are actively involved in reviewing risk exposure, supplier engagement practices, and compliance with our ethical sourcing standards. Oversight of modern slavery risk forms part of the Group’s ongoing governance and compliance review processes.*

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### **3. Structure, Operations and Supply Chains**

#### **Operations**

*The TradeTools Group operates:*

- *A network of industrial tool stores throughout Queensland and Northern New South Wales*
- *E-commerce sales channels*
- *Manufacturing and assembly facilities on the Gold Coast*
- *Repair and servicing departments*
- *Warehousing and distribution operations*
- *Freight and logistics teams*
- *An importing and wholesale division*

*These operations are supported by more than 300 employees.*

*Certain Renegade Industrial air compressors and petrol equipment are assembled at our Gold Coast facilities using components sourced both locally and internationally. Some products are manufactured using locally sourced raw steel components.*

#### **Supply Chains**

*The TradeTools Group maintains approximately 1100 registered supplier relationships across Australia and overseas, including factories, resellers, agents, distributors, service providers, partners, and contractors.*

*While the Group maintains this broader supplier base, 304 overseas suppliers and service providers were active during the 2025 reporting period.*

*With limited exceptions, the Group does not own or operate the factories that manufacture the products we sell. Products are manufactured, distributed, or resold by third-party suppliers located in Australia and overseas.*

*During the 2025 reporting period:*

- *Over 70% of suppliers were based in Australia*
- *21.6% were based in China*
- *4.5% were based in Taiwan*
- *The remaining suppliers were located in the United States, India, and Europe*

*Where locally assembled products incorporate internationally sourced components, those suppliers are subject to our risk assessment and management processes.*

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#### **4. Risks of Modern Slavery in Operations and Supply Chains**

*Under the Modern Slavery Act 2018, modern slavery includes eight serious forms of exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting, and the worst forms of child labour.*

*We also consider additional risk indicators, including:*

- *Poor working conditions*
- *Unsafe workplaces*
- *Excessive working hours*
- *Unpaid work*
- *Child labour*
- *Discrimination or persecution based on gender, religion, ethnicity, social background, or caste*

##### ***Risk in Australian Operations and Suppliers – Very Low***

*The risk of modern slavery within the TradeTools Group's Australian operations and direct Australian suppliers has been assessed as very low.*

*Our employees and those of our Australian suppliers are protected by:*

- *Industrial relations legislation*
- *Modern awards*
- *Employment contracts*
- *Oversight by state and national regulators*

*Our recruitment practices verify eligibility and right to work in Australia. We maintain policies that address human rights and labour standards, and we provide grievance mechanisms that allow employees to raise concerns confidentially.*

*While direct domestic risk is assessed as very low, we acknowledge that extended international supply chains of Australian suppliers may carry residual risk.*

##### ***Risk in International Suppliers – Low to Moderate***

*In 2025, the Group engaged 173 active overseas suppliers and service providers across Asia, India, Europe, and the United States.*

*Risk levels were assessed based on:*

- *Country risk*
- *Industry sector risk*
- *Nature of goods supplied*
- *Length and transparency of supplier relationship*

*European- and United States-based suppliers were assessed as very low risk.*

*China and India present comparatively higher inherent country risk based on global reporting. While forced labour is prohibited under Chinese criminal law, international reporting indicates that enforcement risks may remain in certain sectors and regions.*

*However:*

- *We do not directly source phones or computer goods from electronics manufacturers.*
- *Telecommunication devices are procured from Australian-based suppliers.*

- *Long-standing supplier relationships (many exceeding 30 years), site inspections, and supply agreements reduce overall exposure.*

**We assess:**

- *Chinese non-electronics manufacturers: low risk*
- *Chinese electronics-related manufacturers: low to moderate risk*
- *Indian suppliers (where applicable through extended supply chains): low to moderate risk*

*We acknowledge that tracing risks to raw material extraction and lower-tier suppliers — particularly in electronics supply chains — remains challenging.*

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## **5. Actions Taken to Assess and Address Risks**

*The TradeTools Group employs the following measures:*

### **1. Long-Term Supplier Relationships**

*We maintain long-standing partnerships, particularly in China and Taiwan, often developed over 30+ years.*

### **2. Site Visits and Inspections**

*Group representatives have historically conducted regular site visits and inspections of international suppliers.*

*Although international travel restrictions during COVID-19 (2020–2022) and residual logistical challenges affected in-person visits in subsequent years, our supplier oversight processes remained active through alternative verification methods.*

### **3. Supplier Declarations**

*Between 2020 and 2025, we obtained signed statements from key international suppliers confirming:*

- *Compliance with the Modern Slavery Act 2018*
- *Adherence to our ethical sourcing expectations*
- *Internal quality assurance processes addressing forced labour risks*

### **4. Risk Assessment Processes**

*We conduct periodic country and supplier risk reviews, focusing on higher-risk jurisdictions and sectors.*

### **5. Policies and Grievance Mechanisms**

*We maintain policies addressing ethical conduct and labour standards. Employees may report concerns through established internal channels.*

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## **6. Assessing Effectiveness**

We assess the effectiveness of our modern slavery risk management framework through:

- 1. Supplier Compliance Rates**  
*Monitoring completion and renewal of supplier declarations.*
- 2. Ongoing Risk Reviews**  
*Periodic reassessment of country and sector risk exposure.*
- 3. Training and Awareness**  
*Ensuring employees involved in procurement and supplier engagement understand modern slavery risk indicators.*
- 4. Site Visits and Audits**  
*Resumption and expansion of on-site inspections where feasible.*
- 5. Grievance Monitoring**  
*Tracking reported concerns and resolution outcomes.*

*The TradeTools Group conducts an annual internal review of its modern slavery framework and will implement corrective actions where deficiencies are identified.*

*We intend to further engage Australian-based suppliers in upcoming reporting periods to better understand and assess risks within their extended supply chains.*

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## **7. Consultation Within Group Entities**

*All entities covered by this statement are managed from the Group Head Office on the Gold Coast.*

*Directors and senior management were consulted during the reporting period in the preparation of this statement. The statement has been reviewed and approved by the Boards of the reporting entities.*

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## **8. Commitment**

*The TradeTools Group is committed to managing and, where possible, eliminating modern slavery risks within our operations and supply chains. We recognise that modern slavery risk management is an ongoing process requiring continual improvement, transparency, and vigilance.*



**Chee Zhong**

Managing Director

March 2026