



Modern Slavery Statement

Version: June 2021

INTRODUCTION

At Wormald, we do the right thing in all aspects of our business. All of us, every day, exhibit an unwavering dedication to the highest ethical standards. We live by our principles and comply with the letter and the spirit of the law.

We have been protecting people and property for over 130 years. Our legacy, and our future aspirations, demand that we set high standards of conduct and meet our expectations.

This Modern Slavery Statement sets out Wormald's supplier and procurement processes which address the risks associated with modern slavery.

During financial year 2021 our progress includes revisiting our due diligence and remediation processes, included the implementation of a Supplier Code of Conduct and using a risk-based approach. Wormald continues to integrate these measures into our ongoing supplier due diligence process.

1. STRUCTURE, OPERATIONS AND SUPPLY CHAINS

A. STRUCTURE

Wormald Australia Pty Ltd (ABN 80 008 399 004) is a private Australian company which is 100% owned by Wormald International LLC which is incorporated in the United States.

B. OPERATIONS

Wormald is a leading provider of fire protection solutions in Australia and has been helping to protect people and property for over 130 years. Our expertise spans the design, manufacture, installation and service of fire safety products and equipment backed up with a comprehensive range of fire services from engineering advice to fire safety training.

Wormald supplies specialist fire protection services to the mining, marine, industrial, commercial and retail industries. Many leading companies and government bodies also rely on our specialist expertise. Other businesses of ours include:

- **Wormald Security**
Sophisticated asset protection for high-risk, production intensive and essential service operations.
- **GAAM Emergency Products**
GAAM Emergency Products is a diversified company providing specialised equipment to the emergency services and other industries operating in demanding environments. They specialise in the design and manufacture of pumps for urban and rural fire fighting, as well as ancillary items such as nozzles, hoses and couplings. GAAM also provides a range of emergency services rescue and protective equipment, including; fire helmets, forced entry tools, hydraulic cutting gear, thermal imaging cameras, vehicle lights and sirens.
- **Wormald Technology**
Technology specialises in the design, supply, installation and commissioning of marine, naval and military fire protection, detection, safety and security systems.
- **Simplex Time Solutions**
In 1894, Simplex Time Solutions developed its first time recorder. Since then, Simplex Time Solutions continues this fine tradition of quality products & services throughout Australia by offering the market place end-to-end time and attendance packages, master clock systems, time displays and advanced software and biometric solutions.
- **Exelgard**
Established over 18 years ago, Exelgard is a leading supplier of fire protection products in Australia, selling to fire companies, wholesalers, distributors, government departments and retailers. Exelgard's range of well manufactured and reliable fire fighting equipment include; fire extinguishers, fire blankets, domestic smoke alarms, hoses, hose reels, couplings, nozzles and safety signage.
- **National Fire Solutions**
NFS has grown to be one of the largest and most respected providers of fire protection installations, products and services with offices nationally. NFS provides innovative fire protection solutions with cutting edge technology backed by technical excellence and a company wide commitment to personal customer service.

As at June 2021, Wormald had just under 1000 employees and annual revenue of approximately \$260 million.

C. SUPPLY CHAINS

Ethical sourcing overview

We acknowledge that protecting human rights in supply chains is a global issue and we understand the important role we have in safeguarding human rights within our complex supply chains.

We are committed to protecting and upholding fundamental human rights as set out in the Universal Declaration of Human Rights. We do so by conducting our business with due care, acting in accordance with relevant laws and regulations, and creating a culture of respect and inclusivity.

While our approach to ethical sourcing continues to evolve, we remain committed to working with our stakeholders to identify, understand and remedy negative human rights impacts across our business.

Supply Chain - Ethical Sourcing Initiatives

Our Ethical Sourcing Program is aimed at ensuring suppliers within our supply chains conduct business with integrity, and that they uphold, protect and respect the human and labour rights of their workers, and provide a safe and healthy workplace.

We take a risk-based approach to managing our suppliers within our Ethical Sourcing Program. Suppliers undergo a risk assessment which informs how we manage and monitor their compliance with our Program. It allows us to focus our resources where there is a greater risk of labour or human rights violations, and where we have leverage to facilitate change in our supply chain.

Our expectations of suppliers are detailed in our Ethical Sourcing Policy and Supplier Code of Conduct documents, which draw on international standards and best practice guidance. Our Ethical Sourcing Policy outlines our commitment to ensuring the goods and services we procure are ethically and responsibly sourced. Our Supplier Code of Conduct contains more abridged information in areas such as labour rights, safe working conditions, environment and business integrity. Suppliers are notified of changes to our Policy and Requirements through annual consultation.

This means that, while every one of our suppliers is subject to our Ethical Sourcing Policy and Requirements, we will have different requirements for each supplier depending on their risk, as determined by us.

Selected suppliers (including suppliers within our extended supply chain) are required to provide information on a regular basis about ethical sourcing compliance. While it is impractical for us to monitor compliance for every supplier within our extended supply chains, it is our expectation that our direct suppliers will cascade these or similar requirements to their own suppliers. Provisions requiring this have been added to our Master Subcontract Agreements.

The Policy and Requirements are reviewed annually in consultation with stakeholders to align with changes in regulations and reflect best practice.

Wormald supply chains

What Wormald Buys:

Our centralised Procurement Team focuses on the procurement of fire systems components used in fire sprinkler systems, fire detection systems, occupant warning systems, fire equipment such as fire

extinguishers, fire pumps, and specialised fire rescue equipment, firefighting foams and hardware and services for Wormald:

- Fire system components used in fire sprinkler systems, fire detection systems, and occupant warning systems.
- Fire equipment such as fire extinguishers, fire pumps, pre-engineered fire suppression systems
- Specialised fire rescue equipment, firefighting foams and hardware.

Other notable procurement categories for Wormald include:

- Professional services (e.g. consulting, advisory, software development and legal services)
- Business travel
- Banking and payments
- Recruitment services
- IT hardware, consumables, and software.
- Stationery and printing

Where Wormald buys from:

Wormald purchases various categories of equipment from China and to a small extent Malaysia, with it noted that this poses some risk of modern slavery in the relevant supply chains. In order to minimise these risks, Wormald has undertaken due diligence steps including ensuring all our overseas suppliers have signed both our Ethical Sourcing Policy and Supplier Code of Conduct documents ensuring suppliers within our supply chains conduct business with integrity, and that they uphold, protect and respect the human and labour rights of their workers, and provide a safe and healthy workplace.

Most of our other suppliers are located in NZ, Australia, the US , the EU and the UK. These countries have a low prevalence of modern slavery and governments that take strong action against it.

2. MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

A. MODERN SLAVERY RISKS IN OUR OPERATIONS

Given the visibility we have over our operations, we consider our modern slavery and human trafficking risk to be low. The recruitment and remuneration processes for our directly employed workforce are subject to our risk management systems Wormald does not:

- engage in financing or lending activities that might support modern slavery
- have joint ventures over which we might have less visibility in relation to the management of modern slavery risks



B. MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS

During financial year 2021, we directly engaged with more than 4530 locally based suppliers, 134 overseas suppliers across Eight (8) countries and we've continued to work on identifying and assessing the modern slavery risks in our supply chains. We conducted a scoping exercise to identify modern slavery risks in our supply chain. We based that exercise on key external standards and guidance (such as the Walk Free Foundation's framework and the International Labour Office's Report on Global Estimates of Modern Slavery, Forced Labour and Forced Marriage) and also by reference to industry, country, entity, product and services risk profiles.

We haven't been made aware of any human trafficking or modern slavery allegations against any of our suppliers. If we're made aware of an allegation, we'll ensure that appropriate action is taken and that it's reported to the relevant authorities.

C. THE RISKS IN WHAT WE BUY

The sectors, products and services in our supply chains that may involve higher risks of modern slavery include:

- Sector and industry risks Product and services risks
- Electronics
- Textiles*
- Electronics - Laptops, computers & mobile phones
- Garments - Apparel and clothing accessories
- Merchandise
- Office furniture
- Offshore / outsourced programming, IT services
- Stationery

Note: Items marked with * may be present deep in our supply chains.

We try to minimise the risk not only that we'll directly cause modern slavery but also that we'll

contribute to it. Our Procurement Team is trained in modern slavery issues, including the potential effect that unrealistic cost and timing expectations may have on encouraging modern slavery. Our people are also required by our Code to report any suspected breaches of the law, including instances of modern slavery.

We don't maintain a central record of our suppliers' suppliers and subcontractors and we recognise that we don't have full visibility over our extended supply chains. We manage the modern slavery risk in our extended supply chains by requiring our suppliers to comply with our Supplier Code and notify us of any actual or potential breaches of it.

THE RISKS IN WHERE OUR SUPPLIERS ARE LOCATED

Less than 5% of our direct suppliers are located in countries that have a medium-high modern slavery risk. The large majority of those are in China and Malaysia.

Fire extinguishers and fire system cylinders are the most prevalent categories of goods and services that we procure from our suppliers in these two countries.

3. ACTIONS TO ASSESS AND ADDRESS THE RISKS

We're committed to high standards of corporate governance and Wormald's directors are responsible for ensuring that we have an appropriate corporate governance framework. Forming part of and underpinning that framework is our Supplier Code of Conduct.

A. DUE DILIGENCE PROCESSES – Supplier Code of Conduct

Wormald suppliers are required to sign our Supplier Code of Conduct which states our suppliers are required:

1. To adhere to ethical and transparent business practices in all their dealings with Wormald and their own supply chain participants.
2. Not to participate in, nor must members of their own supply chain, participate in slavery in any manner. Suppliers must comply with the requirements of the Modern Slavery Act 2018 (Cth of Australia) and the Modern Slavery Act 2018 (NSW). Modern Slavery is broadly defined to cover a range of exploitative practices including, but not restricted to, human trafficking of any kind, forced labour, child labour, removal and/or trade in human organs, forced marriage, debt bondage, serfdom and other slavery like practices.
3. To comply with all applicable laws, rules, regulations and prescribed business practices of the countries, regions, and jurisdictions in which they operate.
4. To obtain and maintain valid and current, all licences, permits, authorisations and registrations required under the applicable laws and regulations where the Supplier conducts business.
5. Not to make or accept bribes or other unlawful incentives to or from any person. Wormald policy and this Supplier Code of Conduct prohibit the payment of bribes or improper payments or gifts of any manner or type to all persons or businesses, as well as their employees, contractors and agents or suppliers to gain, retain or benefit in business.
6. Not to offer or give Wormald employees, contractors, supply chain participants or any agents, inappropriate gifts, entertainment or courtesies, or any other kind of personal or financial benefit arising from Wormald's relationship with the Supplier.
7. Not to undertake any manufacturing, perform work or provide services for Wormald employees, contractors, supply chain participants or agents personally, as this has the potential to lead to conflicts of interest.
8. Not to have any form of conflict of interest with the products or services provided by the Supplier to Wormald.
9. To safeguard, protect and only make valid use of Wormald (and its customers') confidential information and intellectual property rights. The confidential information and intellectual property rights (including in prototypes, designs, drawings, plans, processes, techniques) of Wormald (and its customers) remain the exclusive property of Wormald (and its customers) and must not be used by the Supplier for itself or for any other 3rd party.
10. To comply with all applicable quality, health, safety and environmental laws and regulations.
11. Participate in an audit to confirm compliance with the above as Wormald reasonably requires.

The Supplier also undertakes to regularly review and address, at least annually, their own business activities and operations and that of their suppliers and other members of their supply chain to ensure compliance with the above.

By continuing to supply to Wormald and related companies the supplier, acknowledges receipt of and undertake compliance to this Supplier Code of Conduct.

B. REMEDATION PROCESSES

In addition to our Supplier Code of Conduct, we have a number of mechanisms that allow our employees and third parties to report concerns about suspected or actual improper conduct, including in relation to modern slavery. These include:

Code of Ethical Conduct. Our Code applies to all directors, officers, employees, contractors and consultants of Wormald. It sets out the ground rules for the way we work, including our zero-tolerance approach to bribery and corruption. The Code is available to employees via Wormald's intranet.

Whistleblower Policy. Our Whistleblower Policy applies to:

- an officer, director or employee of the Company
- a contractor or supplier of goods and services to the Company, or their current and former employees
- an "associate" (as that term is defined in the Corporations Act 2001) of the Company
- a family member of an individual mentioned above

Disclosable matters include any conduct that is:

- dishonest
- fraudulent
- corrupt
- illegal
- unethical
- contrary to workplace health and safety practices or poses a serious risk to the health and safety of any person at the workplace
- in breach of the Company's policies
- a danger, or represents a danger to the public, the environment and/or the government

We expect our Suppliers to willingly abide by these same values and employ the same standards as summarised in this Supplier Code of Conduct. We also expect that our Suppliers will report any noncompliance to Wormald and, as necessary, to their local or governing authorities as soon as practical.

Suppliers found to be in violation of these values or requirements may lose business opportunities with Wormald and may be reported to the relevant authorities within Australia or elsewhere, as deemed appropriate by Wormald.

4. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Our Procurement Team has key performance indicators (**KPIs**) to manage and report on the quantitative impact of our actions in response to modern day slavery risks.

The KPIs include:

- Number of suppliers that have committed to our Supplier Code
- The number of whistleblowing alerts raised and related to our procurement activities and modern slavery risks

Our Procurement, Legal and OH&S teams meet on a regular basis to continually assess and monitor our risk assessment processes, our identified modern slavery risks and how we're mitigating them.


5. CONSULTATION AND APPROVAL

This is a Modern Slavery Statement of Wormald Australia Pty Ltd as a reporting entity under Australia's *Modern Slavery Act 2018 (Cth)*. It was circulated to the directors of Wormald Australia Pty Ltd for comment prior to being reviewed and approved by the Board on 22 June 2021

Signed by:



Andrew Lee – Director



Chris O'Sullivan - Director

