



Access Hardware Modern Slavery and Human Trafficking Statement

December 2021

Contents

Modern Slavery and Human Trafficking Statement

Introduction	2
Organisational structure and supply chains	2
Relevant policies	2
Performance indicators	4
Training	4
Awareness-raising programme	4
2020 Commitment	5
Effectiveness	5
Future Commitment	5
Approval	6

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out the Access Hardware Group's actions to understand potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 July 2020 to 30th June 2021.

As part of the construction products and construction activity sector, we recognise that we have a responsibility to take a robust approach to managing the risk of slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of the Access Hardware Group of companies.

- The Access Hardware Group of companies consists of wholesaling, distribution, direct product sourcing, locksmithing, manufacturing and the installation of security products.

We currently primarily trade in the Australian market although product is sourced from various local suppliers as well as countries outside of Australia including but not limited to China, USA, UK and NZ.

Responsibility for our anti-slavery initiatives is as follows

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Employee code of conduct Our code makes it clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing the supply chain.

- **Supplier/Procurement code of conduct** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they

provide safe working conditions where necessary, treat employees with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship. All suppliers that we classify as a mid to high risk or coming from a region that may be classified as a higher risk are required to complete documentation outlining that they abide by our modern slavery code of conduct.

- **Recruitment/Agency workers policy** We use only specified, reputable employment agencies in our internal human resource departments to source labour and verify the practices of any new agency that it is using before accepting workers from that agency.
- **Due diligence** We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:
 - mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking;
 - evaluating the modern slavery and human trafficking risks of each new supplier
 - reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
 - conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified;
 - invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

Policies: Responsibility for putting in place and reviewing policies and the process by which they were developed is shared between the National Operations Manager and the Chief Operating Officer.

- **Risk assessments:** Responsibility for putting in place the process and broad organisational responsibility for human rights and modern slavery risk analysis is shared between the National Operations Manager and the Chief Operating Officer.
- **Investigations/due diligence:** Responsibility for ongoing investigations/due diligence falls under Supply & Logistics Department headed by the National Operations Manager.
- **Training:** Training has been provided for key staff where in their roles, exposure to human rights and modern slavery practices is possible. This training will be completed at a minimum of every two years.

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- developing a system for supply chain verification, whereby we evaluate potential suppliers before they enter the supply chain; and
- reviewing our existing supply chains whereby we evaluate all existing suppliers.

Training

We require Supply Chain, HR, Sales, Marketing & Managers within our organisation to complete training on modern slavery.

Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- the basic principles of the Modern Slavery Act;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

2020 Commitment

The below outlines the approach we committed to in 2020.

- Enhance our existing supplier applications to include a Modern Slavery screening assessment.
- Develop a Modern Slavery self-assessment questionnaire aimed at analysing current supply chain risk, to be completed by existing suppliers.
- Development of Modern Slavery training module and successful completion by all key employees within Supply Chain, HR, Sales, Marketing & Managers.

Effectiveness

Access Hardware continues to assess the effectiveness of its actions in comparison to industry standard and practices.

Access Hardware have a range of ways on how we assess the effectiveness of its actions, including:

- Established process to review the actions we have taken, including quarterly review by our Modern Slavery Working Group.
- Internal audits of specific steps taken to assess and address modern slavery risk.
- Working with suppliers to check how they are progressing, including any actions they have put in place to address modern slavery risks.

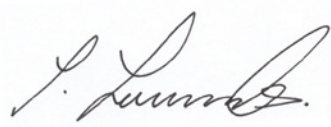
Future Commitment

Access Hardware remains dedicated to retaining and further strengthening practices to continuously reduce any possible slavery and human trafficking risks. Over the next year our commitment will be:

- Modern Slavery working group to continue to meet every quarter to review our current risk assessment process, action plans, training, future commitments and review of our Modern Slavery Statement.
- National Operations Manager to continue reviewing our supply chain to identify any weaknesses and rectify any areas of concern.
- Completion of Modern Slavery self-assessments by key suppliers including, ongoing engagement and consultation with suppliers to identify and prevent slavery within the supply chain.
- Review and update training module to ensure relevance and effectiveness prior to training commencement in March 2023.
- Continuously review and improve current policies & processes to include specific references to Modern Slavery & Human Trafficking.

Approval

This statement was approved on December 20th, 2021 by the Board of Directors of Access Hardware Holdings Pty Ltd on behalf of the Access Hardware Group of Companies.



Spencer Lowndes
Group Managing Director