



Coventry Group Ltd

MODERN SLAVERY STATEMENT 2025

VALUES

AT COVENTRY GROUP, OUR VALUES ARE

SAFETY FIRST

We place the health, safety and wellbeing of our people first

DO THE RIGHT THING - FAIRNESS, INTEGRITY & RESPECT

We treat everyone equally, we operate with competence and we treat everyone with respect

WORK AS A TEAM

We work with strength and resilience together

BE THE BEST AT EVERYTHING WE DO

We strive to be better every day, finding new ways to grow our Company and each other

OUR PEOPLE we trust and empower our people

OUR CUSTOMERS we are dedicated to our customer's needs

OUR SUPPLIERS we work in partnership with our suppliers



MODERN SLAVERY STATEMENT

Coventry Group Ltd is principally a distributor of industrial products and services operating throughout Australia and New Zealand.

This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (Cth) and covers the activities of Coventry Group Ltd ABN 37 008 670 102 and its related entities (Coventry Group). We consulted throughout the business in the development of this statement which sets out actions taken by Coventry Group to address modern slavery and human trafficking risks in its business and supply chains for the calendar year ended 31 December 2025.

This is Coventry Group's sixth statement and describes our recent actions to assess and address relevant risks.

Coventry Group is committed to respecting human rights and implementing policies, procedures, and internal checks to eradicate any form of Modern Slavery from its operations and supply chain. Coventry Group employees are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.



STRUCTURE, OPERATIONS AND OUR SUPPLY CHAINS

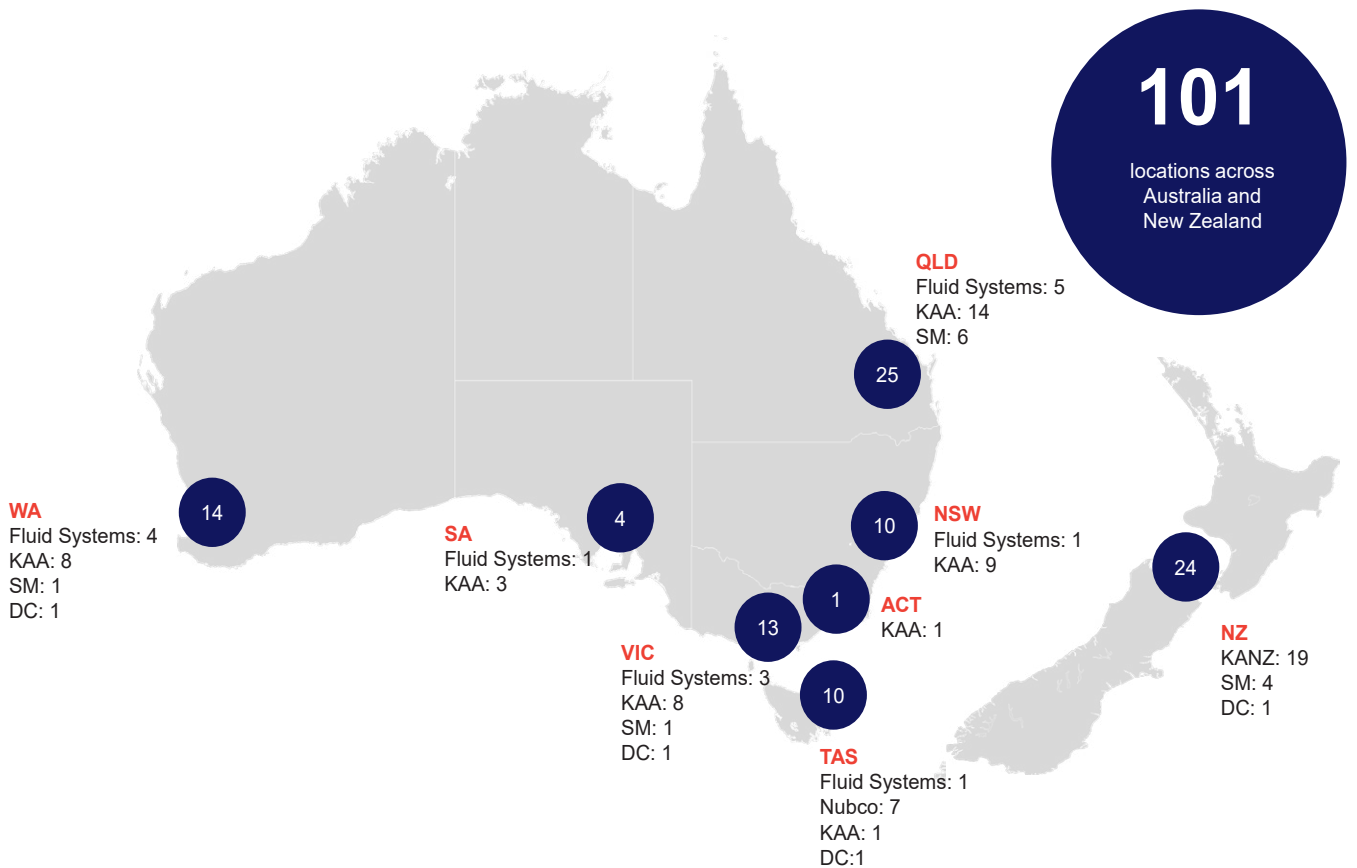
Coventry has two operating segments:

TRADE DISTRIBUTION

Trade Distribution comprises Konnect and Artia Australia, Konnect and Artia New Zealand, GHL (NZ), NZ Plank Hire, Nubco Pty Ltd (ABN 14009543248) and the Steelmasters Group and subsidiary companies in Australia and New Zealand of Boltmasters (ABN 90010667400), Profast (ABN 17094933052), Galvmasters, and Steelmasters. These businesses supply a range of fastening systems, cabinet hardware systems, fencing, scaffolding, and industrial and construction products through a network of 59 branches and 3 distribution centres in Australia and 23 branches and 1 distribution centre in New Zealand. Customers are in the industrial, manufacturing, construction, infrastructure, agriculture, and mining sectors.

FLUID SYSTEMS

Fluid Systems comprises Cooper Fluid Systems, Torque Industries, H.I.S. Hose and Fluid Power Services. These businesses design, manufacture and sell hydraulic, lubrication, fire suppression and refuelling systems and products through 15 branches in Australia. Customers are in the mining, manufacturing, defence, recycling, and agriculture sectors.





The supply chains for these businesses include trading stock and manufacturing inputs that are sourced widely within Australia and New Zealand (c. 84%) and overseas (c. 16%) from countries including:

- China
- United States and
- Taiwan.

Coventry Group staff are employed across all states and territories of Australia and New Zealand and services are procured for a variety of operational needs including, but not limited to:

- information technology
- marketing
- freight
- travel
- rent and
- building maintenance.

IDENTIFYING AND ADDRESSING MODERN SLAVERY RISKS IN OUR OPERATIONS

Coventry Group takes its employment compliance obligations seriously and is committed to maintaining high standards of corporate governance.

Coventry Group also has robust charters, policies and processes in place to ensure compliance with all legislation and industrial instruments. Our staff in Australia are covered by a combination of Federal Awards, the National Employment Standards, and the Fair Work Act, while our staff in New Zealand are covered by New Zealand Employment Legislation.

Coventry Group is committed to a high level of compliance with Modern Slavery legislation, including the Modern Slavery Act 2018 (Cth). Below is an overview of the key policies we have in place to address modern slavery risks:

Code of Conduct	<p>The Code of Conduct applies to directors and all employees of Coventry Group and its subsidiaries regardless of status or work location.</p> <p>The Company Values of Safety First, Do the Right Thing, Work as a Team and Be the Best, govern the behaviours and conduct expected at Coventry Group.</p> <p>Breaches of the Code are to be reported to Management, the Human Resources Team, or the Coventry Leadership Team.</p> <p>Coventry Group's Code of Conduct is regularly reviewed and updated, is part of the induction process for all new employees, and is available on both the internal intranet and CGL website.</p>
Ethical Sourcing and Modern Slavery Act Policy	<p>Coventry Group is committed to ethical sourcing and as such has developed this policy in line with the Australian Modern Slavery Act 2018 in respect to promoting human rights and eradicating modern slavery, working with all our stakeholders to fulfil this common goal.</p>
Anti-Bribery and Corruption Policy	<p>Fostering a culture of corporate compliance, ethical behaviour and good corporate governance, this policy is intended to ensure all directors, employees, contractors, and other relevant persons are aware that giving bribes or other improper payments of benefits to public officials is a serious criminal offence, can damage the reputation of Coventry Group and its standing in the community, and is a breach of the Company's Code of Conduct.</p>
Purchase Order Terms and Conditions Policy	<p>This policy applies to the purchase and sale of goods and services. It ensures that all parties contracted with Coventry Group uphold ethical business standards and maintain policies that respect human rights.</p> <p>Contracted parties must identify and address risks within their operations and supply chains to prevent and remedy any form of forced, bonded, or involuntary labour, including child labour, slavery, slavery-like practices, servitude, deceptive recruitment, withholding of identity papers as a condition of work, and human trafficking.</p>
Whistleblower Policy	<p>The Whistleblower Policy is intended to protect directors, employees, contractors, and other relevant persons who raise concerns about activities or behaviours at Coventry Group that are illegal, dishonest, fraudulent, corrupt, unethical, unsafe, or breach the Company Values or the Code of Conduct. It ensures individuals can report concerns without fear of reprisal or victimisation.</p>

IDENTIFYING AND ADDRESSING RISK IN OUR SUPPLY CHAIN

Coventry acknowledges that there is the potential for modern slavery in certain higher risk geographies within its supply chain. This includes a small number of direct overseas suppliers and second and third tier suppliers based overseas.

In addition to sourcing products for resale across its branch network, Coventry Group also acquires a range of goods and services to support its business operations. These include:

- transport and logistics services
- facilities management, such as cleaning, waste disposal, and security
- utilities
- property development, including store fit-outs, repairs, and maintenance
- staff uniforms
- technology solutions, encompassing hardware, software, and related services
- financial and payment processing services and
- professional advisory and consulting services.

Coventry's Ethical Sourcing and Modern Slavery Policy and its associated procedure and supplier questionnaire sets out Coventry's requirements and expectations to its suppliers, wholesalers, and agents, whether national or international, to comply with relevant laws, regulations, treaties, covenants, or other agreements, such as International Labour Organisation (ILO) standards and the United Nations Global Compact.

While Coventry has not identified any incidents or material risks of modern slavery in its supply chain, it takes its responsibilities and obligations seriously. Coventry will continue to refine and strengthen its supply chain policies and processes, refine and improve staff risk management training and continue to conduct its annual ethical sourcing risk assessments of suppliers.

In 2025, Coventry Group introduced its Ethical Sourcing Training Pack as part of the Company's broader commitment to ethical governance and sustainable supply chain management. This initiative ensured that all buyers and procurement personnel received comprehensive training to strengthen responsible sourcing practices and mitigate supply chain risks. In addition, all employees were informed of the training pack's ongoing availability, reinforcing a culture of accountability, integrity, and continuous improvement across the organisation.



EFFECTIVENESS OF OUR ACTIONS

The oversight of Modern Slavery risk assessment, management and control at Coventry has been delegated by the Board to the Coventry Leadership Team. This team reports to the Board on a regular basis through the Managing Director.

Coventry has a supplier risk assessment system in place to oversee its international suppliers (predominantly in North America and Asia) which includes strong relationship management, site visits and training. During 2025, it conducted ethical sourcing risk assessments of 75% of its total spend of overseas suppliers, and visited all of its large China based suppliers, plus numerous potential suppliers to perform site checks and screenings.

During 2025, Coventry conducted ethical sourcing risk assessments of the top 40 local suppliers from each of its businesses, which equated to 73% of its total spend of locally based suppliers.

Coventry is aware that some of its local suppliers source their products from international suppliers and mitigates these risks through an understanding of each supplier's visibility of their own supply chain, whether it be high, moderate or developing through self-assessment questionnaires sent to suppliers as part of the ethical sourcing risk assessments.

Additional due diligence performed included providing fact sheets to suppliers on Modern Slavery in Australia, New Zealand, and globally, as well as suggested tasks, additional information, and resources.

LOOKING FORWARD

Looking forward, Coventry Group will focus on:

- reviewing and revising its policies concerning modern slavery;
- updating the supplier onboarding procedures and associated documentation;
- extending modern slavery training to a wider range of team members; and
- maintaining engagement with suppliers to enhance awareness of modern slavery risks.

This Modern Slavery Statement was approved by the Board of Coventry Group Ltd on 27 February 2026.



Nik Alpert

Chief Executive Officer and Managing Director

