

MODERN SLAVERY STATEMENT 21/22

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Häfele acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures; and to Elders both past and <u>present</u>.



OUR PHILOSOPHY



rom the beginning company founder Adolf Häfele made an effort to make personal contact and regularly visited his partners on-site. And 90 years later, we're still convinced: only by being close to our customers can we better understand their needs, analyse framework conditions more precisely and more quickly identify improvement opportunities.

Häfele has become synonymous with the greater convenience and pioneering ideas for living, working and leisure and underpins the company's hardware technology credentials in the fields of furniture construction, optimum office organisation and in innovative space management.

We source products from around the world to bring the Australian market the most current and innovative products and design ideas. Partnering with highly regarded European suppliers, guarantees quality products in every Australian Home. The message behind this, is that we offer a complete one-stop service, comprehensive advice, sound development competence, and sophisticated logistics - all ideal qualifications for trouble free application in the furniture industry, building and design trades.

At Häfele this knowledge gained by being close to our customers has always been coupled with a wealth of ideas, courage and the drive to always stay one step ahead. To date, this approach has resulted in new products, efficient processes and innovative services and solutions. And in turn, these innovations always bring us one step closer to our customers.

This voluntary statement is published by Häfele Australia Pty Ltd (hereafter referred to as Häfele).



At Häfele our values are very important to us and reflect our company's drive and passion for success, inclusion and integrity.

- We believe in building a positive team with a family spirit
- Integrity to do what is right and being open and honest in what we do
- To be resourceful and adapt and respond to circumstances
- To relentlessly pursue excellence and take pride in all that we do



BUSINESS & SUPPLY CHAINS

Häfele Australia Pty Ltd was founded in 1982. The company has grown rapidly since then with its Head office in Dandenong Victoria and offices in Adelaide, Sydney, Perth, Brisbane, Canberra, Newcastle, Launceston and Hobart.

Häfele is a world leading manufacturer, supplier and wholesaler of furniture hardware, leading the way in style, design and quality in product categories such as:

- Furniture and door handles
- Furniture, kitchen and living solutions
- Architectural hardware
- Sliding, folding and tambour door fittings
- Lighting and electrical fittings
- Tools and consumables

EXECUTIVE MANAGEMENT TEAM



PETER FARRUGIA Managing Director

Peter Farrugia joined Häfele in 1986 in customer service. He worked in various roles, then established Häfele New Zealand subsidiary in 1990. After serving as MD at Häfele New Zealand, in 1998 Peter then transferred to Australia as Managing Director.

DEBBIE BURROWS Finance Director

Debbie Burrows joined Häfele in 1993 as the Company Accountant. She was appointed to her current role as Finance Director in March 2021.



ANDREW GRAY General Manager - Supply Chain

Andrew Gray joined Häfele in 1983 when the Company was less than a year old, starting in Customer Service and progressing through Account Management, General Manager Sales and Marketing before taking the position of General Manager – Supply Chain in 2019.

In delivering these products and services, Häfele engages a trusted network of suppliers, contractors and agents. This includes companies specialising in transportation and cartage contracting, warehousing, freight forwarding agents, shipping lines, information technology, security, travel agents, equipment and uniform providers, cleaning, finance, insurance and legal services. In most instances, long standing relationships have been established with the aforementioned businesses. However, in order to meet the ever-changing needs of our clients, Häfele also engages the services of specialised companies on short-term, ad-hoc arrangement.

IDENTIFYING RISKS

Ithough Häfele is an Australian based company, the global nature of the work we conduct leads us to be increasingly exposed to the risk of modern slavery in our operations and supply chain. As we continue to expand our domestic reach, it is a risk we commit to assess and mitigate through the continued review of our processes and practices.

Given the international nature of our work, Häfele's supply chain includes companies registered in countries identified as high to medium risk on the Global Slavery Index. In addition, work conducted may be undertaken by entities Häfele does not have a direct contractual relationship with. As such, a lack of oversight into the hiring and labour conditions of these companies lends itself to an increased risk that modern slavery practices may be engaged.

In addition, the challenges inherent with ever increasing remote work conducted across a diverse range of environments increases exposure to risk of modern slavery practices. These work environments can contrast as starkly as COVID safe domestic workplaces that include offices with reduced staff and private homes, to large containerships and other vessels traversing international waters. The nature of the work conducted encompasses working hours that are around the clock, 24-7 and therefore, workplace conditions, performance and practices are inherently more complex and challenging to monitor and evaluate.

An ever increasing demand on the bottomline and maximising returns also negatively impacts the potential for modern slavery practices. This may lead to an increased propensity to engage migrant workers who are at a higher risk of being unaware of labour rights, minimum working standards, conditions and pay. Furthermore, this may contribute to a significantly increased vulnerability to underpayment or non-payment of wages and fraudulent contracting through third-party labour hirer arrangements.

Similarly, increased pressure to meet unrealistic cost targets and delivery timeframes within a COVID world places companies further at risk that exploited labour is engaged within their operations or supply chain. This may take the form of lower barriers to entry for employees and an increase in employment of base-skilled workers, many of whom are from migrant, lowsocio-economic or culturally and linguistically diverse backgrounds and are increasingly vulnerable to issues such as underpayment, withholding of wages and excessive working hours. Vulnerable and marginalised populations also face additional barriers with regards to reporting experiences of harm, due to language, education and literacy levels, visa insecurity and disability. All of which further compounds modern slavery risks.



RISK MITIGATION

Häfele employs a range of methodologies, processes and practices to ensure that we reduce our exposure, both internally and externally, to the risks of modern slavery. Häfele does actively:



Analyse situations of employment to consider if the employee may be exposed to organisations, people, or other entities that could be exploiting the employee.

Review employment situations on a yearly basis to identify any potential exposure to forced labour or other exploitation.



Screen potential employees once offered employment to ensure that they fit the requirements to be employed, including;

- identifying their age is appropriate as per local laws
- their right to work legally in the state of employment
- that they are not being forced to work to benefit others inappropriately or in contravention of the Modern Slavery Act



Ensure that all staff are being paid at or above the minimum wage requirements applicable to their employment.



Require that third party service providers confirm that they do not engage in any modern slavery employment.



Provide anonymous reporting options for employees in order for them to report concerns to management, and encourage staff, via communication surrounding modern slavery regularly in staff bulletins and other internal releases, to actively be on alert for these issues.

RISK MITIGATION

In order to facilitate, and ensure that we adhere to these processes, Häfele conducts a monthly review of the processes and outcomes at the executive level as part of our Compliance Audit activities. At these meetings and as part of the Compliance Audit, the Häfele executive committee will examine:

- New staff employment confirmations, ensuring that police checks are conducted and that the necessary checks relating to modern slavery are conducted as part of the pre-employment process
- Third party service provider onboarding documents and compliance agreements which must be signed by a manager of the service provider and confirming that they are actively employing staff in line with the Modern Slavery Act.



In the event of a detection or suspicion of any activities, either internal or external, relating to modern slavery, the manager involved shall report their findings to the executive committee as soon as possible in order for the executive committee to analyse and take appropriate action. The expected actions on any such detection or suspicion are as follows:

On detection or suspicion of an employee, either existing or potential, being exposed to forced labour, debt bondage, slavery, servitude or deceptive recruiting, the executive committee shall:

- Document all information in as much detail as possible
- Meet with the reporting manager in order to understand the situation in full
- Meet with the employee, along with a support person or HR representative, to discuss the company's concerns and obtain further information in order to assess the situation
- If the situation requires then report the matter to the authorities along with all the evidence obtained
- Suspend the employment of the employee, on full pay, until the investigation is resolved

On detection or suspicion of a third-party service provider having an employee who has been exposed to forced labour, debt bondage, slavery, servitude or deceptive recruiting, the executive committee shall:

- Document all information in as much detail as possible
- Meet with the reporting manager in order to understand the situation in full
- Meet with management of the third-party service provider to discuss the company's concerns and obtain further information in order to assess the situation
- If the situation requires then report the matter to the authorities along with all the evidence obtained
- Suspend the usage of services provided by that third-party until the investigation is resolved

FUTURE COMMITMENTS

In order to continuously reduce the risk of exposure to modern slavery impacts Häfele undertakes the following audit, review and control measures:



Monthly audit meetings of the executive committee to discuss processes, documentation and controls relating to modern slavery. These meetings are documented with related outcomes, follow up action requirements, and any investigations notated.





An annual review of the Häfele Modern Slavery Statement and policies in order to implement improvements and adapt to any changes in addressing modern slavery.



An annual review of third-party service supplier's compliance agreements with Häfele including statements relating to modern slavery mitigation.



Provide opportunities for staff to offer feedback to the company, both via normal communication and also anonymous submissions, regarding the company's activities in relation to modern slavery, and keeping staff updated on those activities.

COMPANY DIRECTORY

CONTACT

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LOCATION

Häfele Australia Pty. Ltd. 8 Monterey Road Dandenong VIC 3175 Australia

Signed

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Peter Farrugia

Managing Director - Häfele Australia On behalf of the Häfele Australia Board of Management Approved by the Häfele Australia Board of Management

