



# Modern Slavery Statement

EGR Group: Modern Slavery Statement for the financial year ended 30<sup>th</sup> June 2020, issued pursuant to Section 13 of the Modern Slavery Act 2018 (Australia); and Section 54 of the Modern Slavery Act 2015 (UK).

## **OUR BUSINESS, STRUCTURE AND SUPPLY CHAINS**

Founded in 1973, the EGR Group is a privately owned world-class designer and manufacturer of precision engineered solutions marketed through two Strategic Divisions – Automotive, and Building and Commercial Products.

EGR's Automotive Division services over fifty of the world's carmakers in the supply of premium automotive accessories. We're trusted to produce OEM-branded and aftermarket window visors, canopies, side steps, hood guards, sports bars, tonneau covers and more.

EGR's Building and Commercial Products Division comprises EGR Décor, EGR Design and EGR Extrusion. All brands are market leaders and supply to an ever growing global client base.

EGR's operates under a vertically integrated structure with multiple manufacturing sites located in Brisbane, Queensland Australia; in Ontario, California, USA; and Bangkok, Thailand.

EGR also has support sites focused on sales, product development liaison and warehousing located in Sydney and Melbourne, Australia; Milton Keynes, The United Kingdom; Detroit, Michigan USA; and Foshan City, China.

EGR employs approximately 1000 personnel worldwide and prides itself as a diverse, people-friendly company. We welcome all within our ranks, and are proud of the wide range of cultures and languages we employ. From mechanical engineering to marketing, and carpentry to robotics, skilled workers make up the majority of our workforce, operating multi-million dollar production lines to create a huge range of products to serve global needs. We're proud of our history of staff training, and internal promotion.

Our supply chain includes over 150 suppliers worldwide throughout Australia, Asia, Europe, North and South America. Our main products sourced include subcomponents for automotive accessories including but not limited to adhesives, clips, electrical components, extrusions, fasteners, injection moulded products, locks, packaging materials, paint, plastic sheet, seals, steel, and tapes.

EGR has its own personnel placed directly in, and working with our key automotive accessory suppliers in China and Thailand to provide technical assistance and monitor quality.

## **OUR POLICIES**

EGR is against modern slavery and human trafficking in all its forms and our company policies and practices strongly reflect this. The company has already developed policies and procedures such as -

Document #111224 EGR Corporate Social Responsibility Policy (Includes - Human Rights Policy; Labour Standards Policy; Environmental Policy; and Anti-Bribery and Anti-Corruption Policy)

Document #111619 EGR Group - Whistleblower Policy

Document #111618 EGR Group - Complaints Handling Policy

Document #111486 EGR Group - Competition Law Compliance Policy

Document #104976 Workplace Health & Safety Policy

Document #105003 EGR Grievance Policy

Document #117205 EGR Code of Ethics

Document # 111704 EGR Mental Health and Wellbeing Policy

EGR also has a long-standing Employee Code of Conduct that includes Zero Tolerance Policies for –

- 1) Drugs and Alcohol in the workplace
- 2) Sexual Harassment
- 3) Workplace harassment and bullying
- 4) Anti-discrimination and equal opportunity
- 5) Theft
- 6) Threatened / Physical Assault; and
- 7) Manual Handling

All of the above documented policies form an important part of our business management systems and fit under EGR's Core Values, known internally as the EGR Standards –

Safety always comes first

Teamwork, work together to achieve more

Attention to detail with a sense of urgency

Nothing less than the highest quality

Do what you say you are going to do, own your actions

Act with integrity

Respect yourself, respect others, respect the environment

Diversity is encouraged and makes us stronger

Seek a better way, continuous learning, continuous improvement.

As part of EGR's commitment to helping eliminate modern slavery and human trafficking practices worldwide, it is our goal to continue to improve upon these policies and practices now and into future.

#### **DUE DILIGENCE PROCESSES - STEPS TO ASSESS AND MANAGE RISKS**

As part of initial due diligence and actions to assess and address the modern slavery risk within EGR's operations, EGR has carried out surveillance of our existing sites through our Human Resources Department. No known or reported incidences / risks of modern slavery / human trafficking could be found.

As part our initial due diligence and actions to assess and address the modern slavery risk within our various supply chains, EGR has assessed 90 of our suppliers, including key suppliers (\*Preferred and High-Spending) in Asia and the Pacific region, North America and Europe / UK. All suppliers were found to be of low risk in engaging in modern slavery and human trafficking practices. Indeed 86% of those suppliers assessed are considered to be of the lowest classifiable risk given the two key criteria used to assess – geographic location and commodity type, using the information / data provided by the Global Slavery Index.

Nevertheless, although all suppliers were assessed as low risk, EGR has implemented measures to combat modern slavery within our supply chain should the situation arise where a supplier or suppliers are found to be at a higher level of risk. This includes requiring suppliers to complete a modern slavery and human trafficking due diligence questionnaire should a supplier be assessed as a medium / high risk, and a site audit should a supplier be assessed as a high risk.

Should a supplier ever be discovered to be using slavery, servitude, forced or compulsory labour and/or human trafficking within its workforce (or within its own supply chain), EGR

would immediately cease using that supplier (or seek for the supplier to cease using their sub-supplier).

## **FINDINGS**

Our overall findings are that the risk of modern slavery and/or human trafficking within our own operations and supply chain are very low to non-existent given the industries we operate in, the commodities procured and geographic locations of our supply chain. The responses received from suppliers who completed our modern slavery / human trafficking questionnaire indicated a good level of awareness of the legislative requirements and conformance to them.

## **TRAINING**

EGR has identified those areas of its business that modern slavery is relevant to, and has commenced awareness training initiatives for those personnel to whom it applies including human resources, purchasing, quality assurance and our support staff located at our sites in supply chain regions of higher risk according to the Global Slavery Index.

As part of our supplier selection process, a pre-qualification checklist is required to be completed – this will be updated to include provisions to cover modern slavery and human trafficking to ensure future supplier selection can eliminate this risk before the possibility of entering our supply chain occurs.

## **OUR EFFECTIVENESS IN ELIMINATING MODERN SLAVERY**

Based on our existing policies and compliance practices already in place, EGR believes that the current prevalence and risk of modern slavery within the company is non-existent and the risk within our supply chains very low.

EGR will continue to stand against all forms of modern slavery and human trafficking, through compliance to statutory and regulatory requirements internally, and by promotion of our policy down through our supply chain, as well as regular assessment of slavery and trafficking risks.

This EGR Group Modern Slavery Statement has been approved by the Board of Directors for the EGR Group on 22<sup>nd</sup> March 2021.

**Signature:**



**Name:** Mr Simon McLellan

**Title:** Chief Executive Officer

**Date:** 22<sup>nd</sup> March 2021