



Modern Slavery Statement 30 June 2021

Introduction

GWA acts ethically and with integrity in all its business dealings and relationships including the implementation and enforcement of effective systems and controls to ensure modern slavery does not take place in its operations or supply chains. In accordance with its risk appetite, GWA has a zero-tolerance policy for modern slavery practices.

This statement is made under section 14 of the *Modern Slavery Act 2018* (Cth) for the financial year ended 30 June 2021. It includes detailed responses to each of the mandatory criteria set out in section 16 of the *Modern Slavery Act 2018* (Cth).

This statement:

- details the structure, operations and supply chains of GWA and its subsidiaries;
- outlines the potential risks of modern slavery that may exist within the operations and supply chains;
- sets out the measures GWA has implemented across its business to assess and address these risks;
- provides an update on how GWA is measuring the effectiveness of the actions taken to assess and address modern slavery risks; and
- concludes by providing an overview of key initiatives planned and in progress for FY22 as part of GWA's efforts to continually improve its response to the risks of modern slavery.

1. Identification of the Reporting Entity

This statement relates to GWA Group Limited (ABN 15 055 964 380) ("GWA") and each of its subsidiaries (together, the "Group").

The list of GWA's subsidiaries is set out in Appendix 1 of this statement and included in GWA's latest Annual Report at www.gwagroup.com.au/investor-relations/annual-reports. GWA's latest Sustainability Report can be found at www.gwagroup.com.au/sustainability.

GWA is a public company listed on the Australian Securities Exchange (ASX). Its registered office is located at Building 3B, 188 Holt Street, Pinkenba QLD 4008 AUSTRALIA.

2. GWA – Structure , Operations and Supply Chains

GWA is a leading innovator, designer and supplier of product solutions, services and intelligent technology focused on the delivery of sustainable water solutions for bathrooms, kitchens and laundries. The company owns and distributes an extensive range of market-leading brands including Caroma, Methven, Clark, Dorf, Deva, Flexispray and Nefa.

GWA's comprehensive product solutions include sanitaryware, tapware, showers, basins, baths, kitchen sinks, laundry tubs, bathroom/kitchen accessories and valves. We have an intelligent bathroom system incorporating Internet of Things (IoT) smart water management technology.

GWA has sale and distribution facilities across its primary end markets of Australia, New Zealand, the United Kingdom and China.

The main operating entities comprise Caroma Industries Limited in Australia; GWA Group (NZ) Limited in New Zealand; Methven UK Limited in the United Kingdom; GWA Trading (Shanghai) Co Ltd in China; with central management and corporate functions housed in the ASX listed parent entity, GWA Group Limited in Australia.

We are highly respected within the building industry for innovation, water efficiency, safety, product reliability, product quality, technical expertise and superior service.

GWA had 569 employees at 30 June 2021 broken down as follows:

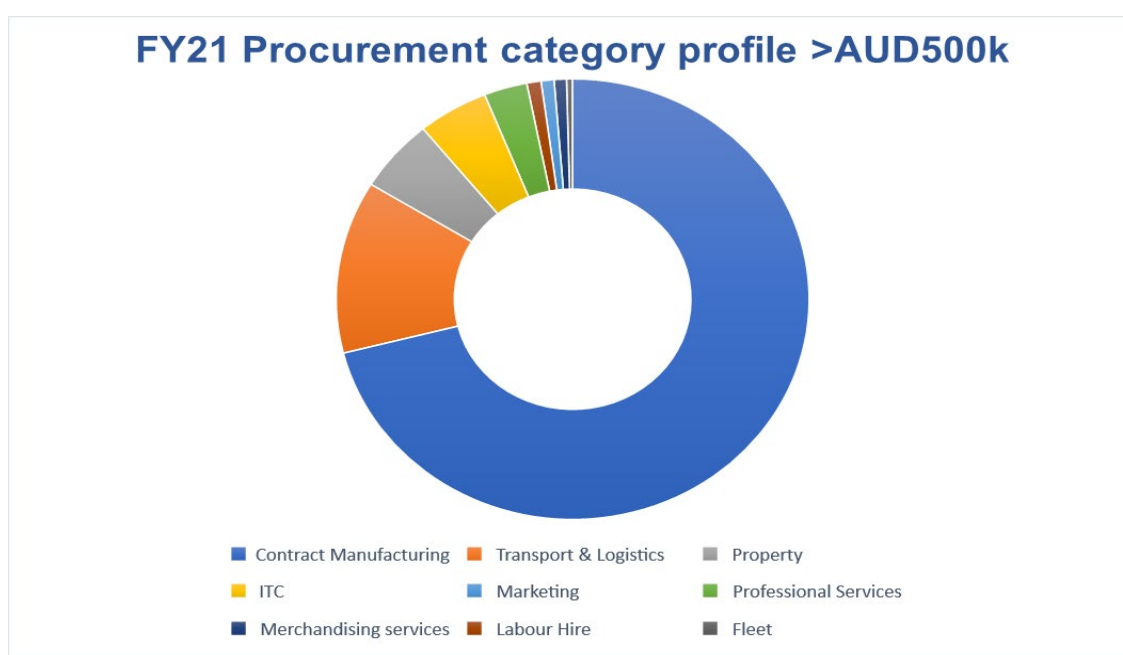
Market	Employee Count
Australia	375
New Zealand	99
United Kingdom	59
China	36
Total	569

The following table is a summary of GWA’s Australian workplace profile at 31 March 2021 as reported to the Workplace Gender Equality Agency:

Gender Diversity	% Female
Management	37%
Non-management	45%
Total	43%

GWA Supply Base

GWA has a diverse supply base predominantly made up of contract manufacturing which accounts for over 70% of our total addressable spend. While contract manufacturing is sourced offshore, the balance of GWA’s supply base is sourced locally in the respective home market and typically from established suppliers operating well-developed governance frameworks that are aligned to GWA’s commitment around human rights and who are themselves assessing and addressing modern slavery risks.



Contract Manufacturing

GWA's largest procurement category is contract manufacturing which involves the manufacture of our products across a portfolio of 34 key supply partners located in China, Malaysia, Vietnam, Thailand, Italy, Sweden and Germany. These partnerships have been established under long-term exclusive contracts and agreements controlled and managed by a centralised GWA team.

Transport, Logistics and Warehousing

GWA's second largest procurement category involves transport, logistics and warehousing which fulfils the movement of our products to and from our operations and customers. This category is outsourced to a small pool of locally based service providers.

GWA's controlled warehouse footprint covers approximately 60,000 sqm in the following markets:

Market	Warehouses
Australia	4
New Zealand	1
United Kingdom	1

The labour mix in our warehouse operations include Enterprise Bargaining Agreement employees, unionised employees, and third party labour hire staff.

3. Risks to modern slavery practices in operations and supply chains

GWA has undertaken an analysis of its operations and supply chains to identify potential risks of modern slavery and believes the overall risk level to be low given the scope and location of the Group's operations, the maturity of its supply partner relationships and the diligence applied by GWA to identify and manage risks in the business.

To identify and assess potential modern slavery risks within its operations and supply chains, GWA references Principle 17 of the UN Guiding Principles on Business and Human Rights, which recommends focusing on assessing general areas of operations and supply chains where modern slavery risks are likely to be most significant. Accordingly, in identifying modern slavery risks, we have had particular regard to geographical location, high-risk products or industries and high-risk work practices.

As previously identified in our FY20 statement, an area within GWA's operations and supply chains that may give rise to potential risks of modern slavery practices is the use of contract manufacturing plants which produce products for GWA in certain countries in Asia. The potential risks which arise in these locations include trafficking, servitude, debt bondage, forced labour and child labour.

COVID-19 related travel restrictions have reduced the Asian manufacturing partner factory visits which has had an impact on the visibility of potential modern slavery risks during FY21. This is expected to improve as travel restrictions are eased in FY22.

During FY21, GWA identified that the use of third party labour hire in our Australian and New Zealand warehouses and logistics operations, transportation, and trade merchandising services may also be an area of our operations in which there are potential risks of modern slavery practices. The potential risks extend to deceptive recruitment, exploitation of migrant workers, excessive working hours, and underpayment of wages.

GWA continually seeks to identify key areas of risk and to develop programs to resolve or mitigate such risks to the best of its abilities.

4. Risk mitigation actions taken to assess and address these risks, including due diligence and remediation processes

In developing its risk mitigation plans, GWA references the UN Guiding Principles on Business and Human Rights. GWA has implemented the following Group-wide risk mitigation measures:

Governance Framework

GWA maintains a comprehensive range of Group-wide programs, policies and procedures that set out our expectations for employees and suppliers and that underpin our commitment to high standards of conduct and behaviour. GWA employees are continuously trained in the policies and procedures, including those related to human rights and GWA's company values.

With respect to modern slavery risks, key policies include:

Risk Appetite Statement	This statement outlines GWA's low risk appetite for exposure to risks relating to its compliance responsibilities, the environment, safety, people, cultural pillars, ethics, reputation, critical system availability, cyber-attacks, and data privacy.
GWA Code of Conduct	GWA's Code of Conduct guides the behaviour of its people and demonstrates the commitment of the Group to ethical practices. Consistent with the Code of Conduct, GWA is committed to complying with all laws and regulations of the countries where we operate including prohibiting forced, trafficked and child labour. A copy of the code is available at www.gwagroup.com.au .
Policy against Slavery and Trafficking in Persons (ref GWA094)	This policy details GWA's zero tolerance approach to Modern Slavery. Applies to all directors, officers and employees of GWA. The policy has been communicated to staff and key suppliers and is available at www.gwagroup.com.au .
Whistleblowing policy (ref GWA1012)	Provides the avenue for raising concerns of malpractice believed to be occurring. Concerns include (but not limited to), unlawful or unethical conduct, fraud or corruption, non-compliance with GWA's Code of Conduct and other relevant policies. A copy is available at www.gwagroup.com.au .
GWA Cultural Pillars	GWA's Cultural Pillars outline the company values and how these are applied to its business activities and the high standards of behaviour expected in the business to achieve the Group's objectives.
Work, Health & Safety policy	Details GWA's commitment to providing fair and safe working conditions for all its staff, casuals, contractors, and visitors.
Diversity and Inclusion policy (ref GWA1009)	Sets out the principles and practises that underpin our approach to developing and maintaining a diverse workplace. A copy is available at www.gwagroup.com.au .
Equal Employment Opportunity, Discrimination, Harassment & Bullying policy	Seeks to treat all workers in a fair and consistent manner, regardless of race, religion, colour, sex or other protected personal characteristics. It also aims to provide all workers with a workplace free from bullying and supports the principles of equal opportunity by applying its employment policies in a non-discriminatory manner.

Policy Against Slavery and Trafficking in Persons

As outlined in the table, GWA has implemented a specific Group-wide policy against slavery and trafficking in persons which applies to all directors, officers and employees of GWA and its subsidiaries. The policy has been communicated to staff and key suppliers and is available at www.gwagroup.com.au.

GWA has appointed an Ethical Standards Officer, the Company Secretary, who is responsible for the administration and maintenance of the policy. The Ethical Standards Officer has primary day-to-day responsibility for implementing the policy, monitoring its use and effectiveness, dealing with any questions that arise, and ensuring audits and internal control systems and procedures are effective in countering modern slavery.

Under the policy GWA staff are required to be proactive and promptly report any suspected violations of the policy or any illegal or unethical behaviour of which they may become aware. Any complaints are treated in the strictest confidence and are dealt with appropriately. No staff member will experience retribution or retaliation for a complaint made in good faith.

Implementation of modern slavery training module

During FY21, GWA implemented an online modern slavery training module which has been rolled out to all Group employees. The training communicates that compliance with the Group's Policy Against Slavery and Trafficking in Persons is the duty of all employees and that individuals can recognise potential risks of modern slavery and take steps to report matters to be addressed.

GWA achieved approximately 90% completion by year end. The remaining employees will complete the training during FY22. Regular refresher training will be provided to employees on a periodic basis to ensure continued awareness and compliance.

Requirements of supply chain partners to address potential risks of modern slavery in their operations

GWA has several long-standing key contract manufacturing partners and transport and logistics partners. These relationships have been maintained through ensuring a satisfactory level of transparency and trust in the partners' business operations.

With respect to its contract manufacturing partners, GWA maintains various policies and procedures to mitigate the risks of modern slavery including:

- GWA expects all manufacturing partners to be in strict compliance with the United Nations Ethical Trading Initiatives (ETI) and International Labour Organisation Conventions (ILO).
- We expect the manufacturing partners to comply with all applicable laws and regulatory requirements regarding health, safety and welfare at each facility to ensure the health, safety and welfare of all workers, customers and any visitors to the facility.
- Manufacturing partners must comply with all applicable laws, rules, regulations, standards and codes which relate to the manufacture, packaging, facilities, storage and delivery of products and the operation of the facility.
- We maintain a Supplier Due Diligence Policy which details the expectations to which all manufacturing partners (including sub-contractors engaged by manufacturing partners), must adhere. GWA conducts thorough due diligence in line with the policy before engaging manufacturing partners.

- GWA conducts factory visits to manufacturing partners by senior management on a regular basis to verify compliance with local laws and safety conditions as well as GWA's Supplier Due Diligence Policy. While COVID-19 related travel restrictions have reduced the manufacturing partner factory visits we have maintained regular engagement and oversight through this period to ensure no issues arise. This has been primarily achieved through our staff who are located at various manufacturing partners in China, regular communications and our modern slavery and ethical sourcing audit programs.
- We work constructively with our overseas manufacturing partners to assist them in adopting workplace safety standards similar to those applying in Australia.
- Manufacturing partners must undergo a Supplier Site Visit Assessment (SSV) prior to entering into purchasing arrangements with GWA. The SSV is a detailed assessment of the supplier's facilities and the manner in which they are operated, including safety, environmental and human resource related factors. COVID-19 related travel restrictions prevented the onboarding of any new manufacturing partners during FY21.
- GWA maintains a Supplier Corporate Social Responsibility Checklist to which supply partners are held accountable for compliance. This checklist incorporates key areas including labour rights, working conditions, living wages and discrimination.
- GWA is updating its Manufacturing Supply Agreements with key manufacturing partners through inserting specific modern slavery clauses and separately requiring its key manufacturing partners to comply with the following:
 - comply with Australian and international modern slavery laws relevant to the supplier;
 - allow GWA to investigate and verify compliance with Australian and international modern slavery laws;
 - provide information regarding itself and each of its suppliers involved in producing GWA products to confirm that neither the supplier nor any of its officers, agents or employees has been convicted or investigated for any offence in connection with any Australian or international modern slavery laws; and
 - confirm implementation of anti-modern slavery policies and due diligence procedures.
- At 30 June 2021, approximately 91% of GWA's Manufacturing Supply Agreements contain these clauses with the others to be updated in FY22 and future periods as agreements are progressively renewed.
- GWA retains the ability to terminate its Manufacturing Supply Agreements should any instances of modern slavery come to light irrespective of whether the specific modern slavery clauses are included.

As outlined in section three, GWA has identified potential modern slavery risks within its labour hire sourced for our warehouse and logistics operations, merchandising and transport services located in Australia and New Zealand. Following a desktop assessment during FY21 of key partners in these categories, we have concluded the potential risk as low for the following reasons:

- GWA has comprehensive people and culture policies, procedures and due diligence activities in place which cover recruitment and selection, right to work checks, training and development and other workplace management activities.

- Under no circumstances are direct or indirect staff required to provide their passports for retention by GWA or any of its labour hire providers.
- GWA requires third party logistics and labour hire providers (including merchandising services) to engage workers on fair employment conditions which we govern through transparent recruitment and pricing practices.
- Australia and New Zealand are governed by local laws and regulations such as Chain of Responsibility and minimum wage requirements that we require third party suppliers to comply with for our ongoing engagement for services.
- Wages and benefits must meet (or exceed) the local law and industry benchmark and be paid regularly and on time. GWA maintains pay parity between labour hire and payroll staff within our warehouse operations.

5. Assessing the effectiveness of the actions we are taking to assess and address the risks of modern slavery practices

GWA recognises the importance of continuous improvement in all its business operations, including the identification and mitigation of modern slavery risks. Our measures of effectiveness of the actions undertaken above include:

Monitoring and Reporting

GWA's Whistleblowing Policy provides an avenue for employees to raise concerns of unethical conduct including human rights issues. There were no reported modern slavery risks or human rights breaches through GWA's Whistleblowing Policy during FY21.

Supplier Audits

With a primary focus on contract manufacturing, to mitigate the risk of slavery and trafficking occurring throughout its supply chains, GWA has instituted modern slavery and ethical sourcing audit programs.

Third party audits are conducted through site visits, document review and interviews with representatives from the supplier. Suppliers are required to remediate any issues identified within an appropriate period, depending on the nature and severity of the non-compliance.

This program is largely performed by GWA personnel, however in FY20, this was supplemented by the engagement of a specialist independent auditor, PWC, as part of GWA's internal audit program. During FY21, GWA conducted audits on a further two of its contract manufacturing suppliers despite COVID-19 and its related travel restrictions. Together with the two supplier audits in FY20, this represents approximately 35% of our global contract manufacturing spend.

No modern slavery issues were identified during these audits. GWA identified a small number of minor workplace health and safety matters during the audits which the suppliers were directed to address. GWA has confirmed that these minor matters have been satisfactorily rectified.

A methodology was established in FY21 to capture key information related to GWA's contract manufacturing suppliers to assist with developing a risk based rolling site visit audit schedule for future years. This analysis will be used as the basis for the annual cycle for supplier audits taking into consideration all available information.

As GWA progresses its modern slavery agenda, it will look to extend the scope of its audit and assessment program to include other procurement categories such as warehouse and logistics operations, merchandising services and transport services.

6. Description of the consultation process with GWA's subsidiaries

GWA sets policies and makes decisions for the Group including all subsidiaries which ensures a consistent approach to addressing modern slavery risks. We ensure that all relevant areas of the company and its subsidiaries are aware of what actions they need to take and that modern slavery risks relating to these areas and subsidiaries have been identified, assessed and addressed.

As part of the consultation process with its subsidiaries, GWA has taken the following actions:

- the adoption and implementation of a policy against slavery and trafficking in persons throughout the corporate group;
- the same modern slavery training and capacity building has been made available throughout the corporate group;
- the reporting of information and analysis about modern slavery risks in the operations and supply chains of subsidiaries; and
- the adoption and implementation of the same risk mitigation actions, due diligence and remediation processes throughout the corporate group.

7. COVID-19 response

As a result of the COVID-19 pandemic, GWA prioritised the health, safety and wellbeing for all of its staff and visitors to its sites. Our warehouse staff in Australia were considered essential workers and continued to work during lockdowns with the reassurance of our adherence to COVID-19 safe practices and protocols. Our focus during the pandemic remains on saving lives and livelihoods. This extended to our key supply partners to understand and support their response efforts to the pandemic to ensure no increased risk of modern slavery practices within their operations.

Many of GWA's supply partners responded with information on the steps they are taking to protect their workers such as:

- the provision of masks and protective personal equipment;
- social distancing guidelines;
- increased cleaning and disinfection of workplace areas;
- alternate working shifts;
- contactless deliveries;
- health and education programs;
- temperature and COVID-19 testing; and
- provision of hired accommodation and chartered transport to access the workplace safely and to protect livelihoods.

GWA is proud of the fact that it has been able to maintain all existing sources of supply and continue to place orders in line with business forecasts. We pay in full for finished product from all suppliers globally and honour agreed payment terms.

As GWA responds and adapts to the implications of the pandemic, we are committed to working together with our supply partners on an open and transparent basis, to mitigate the longer-term impacts of the pandemic and to develop a mutually beneficial and sustainable relationship that minimises the risk of modern slavery practices.

8. Looking ahead

GWA recognises that preventing modern slavery requires a continuing year-on-year commitment. GWA is committed to continuously improving its modern slavery risk identification and mitigations. GWA will continue to track and publicly report on progress through publishing its annual modern slavery statement.

Key initiatives planned and in progress for FY22 include the following:

- continued communication with and training of staff and key suppliers on company policies and procedures relating to modern slavery and ethical sourcing;
- continuing to build long-term relationships with key supply partners to enhance transparency and trust in their business operations;
- development and implementation of a GWA Supplier Code of Conduct which will outline key attributes expected of all supply partners in dealing with GWA and complement our existing policies and procedures in this important area;
- continuing to update key supplier agreements to prohibit modern slavery;
- further auditing of key supply partners as part of the modern slavery and ethical sourcing rolling audit program; and
- review and update of GWA's Whistleblowing Policy to ensure it reflects current best practice and remains aligned with our governance framework.

This statement was approved by the GWA Board of Directors on 26 November 2021.



Darryl D McDonough
Chairman



Urs B Meyerhans
Managing Director

1 December 2021

Appendix 1

List of GWA Subsidiaries at 30 June 2021

Parent entity	Country of incorporation
GWA Group Limited	Australia
Subsidiaries	
Caroma Holdings Limited	Australia
Caroma Industries Limited	Australia
GWA Group (NZ) Limited	New Zealand
Caroma International Pty Ltd	Australia
Caroma Singapore Pte Ltd	Singapore
Caroma Middle East FZCO	UAE
Deva Tap Company Ltd	United Kingdom
GWA Finance Pty Limited	Australia
GWA Group Holdings Limited	Australia
GWA Group Holdings (NZ) Ltd	New Zealand
GWA Trading (Shanghai) Co Ltd	China
Methven Australia Pty Limited	Australia
Methven UK Limited	United Kingdom
Sebel Furniture Holdings Pty Ltd	Australia