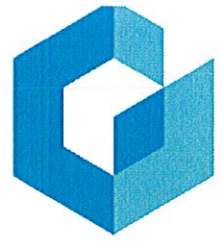


JOINT MODERN SLAVERY STATEMENT



G.JAMES

 **CONTRACT**
GLASS & ALUMINIUM

GOSSI
PARK & STREET FURNITURE

 **QUICK ALLY**
SCAFFOLDING & ACCESS SOLUTIONS

 **Cheras**
INDUSTRIES PTY. LTD.
A Full-Service Provider in the Building Industry

G.James Pty Ltd

G.James Australia Pty Ltd

G.James Safety Glass (Qld) Pty Ltd

G.James Extrusion Co Pty Ltd

G.James Glass & Aluminium Pty Ltd

G.James Glass & Aluminium (Qld) Pty Ltd

G.James Safety Glass Pty Ltd

G.James Safety Glass Pty Ltd

Contract Glass & Aluminium Pty Ltd

G.James Remelt Pty Ltd

G.James Engineering Services Pty Ltd

Cheras Industries Pty Ltd

G.James (N.Z.) Limited





G.JAMES

JOINT MODERN SLAVERY STATEMENT

This Modern Slavery Statement is pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) ('the Act') made in respect of the following companies, for the 2021 Financial Year.

Company Name	ABN	Registered Address
G.James Pty Ltd	25 009 696 404	1084 Kingsford Smith Drive, Eagle Farm, QLD 4009
G.James Australia Pty Ltd	47 010 823 542	
G.James Safety Glass (Qld) Pty Ltd	55 010 828 065	
G.James Extrusion Co Pty Ltd	95 010 828 234	
G.James Glass & Aluminium Pty Ltd	23 010 828 369	
G.James Glass & Aluminium (Qld) Pty Ltd	53 010 828 056	
G.James Safety Glass Pty Ltd	86 001 230 039	
Contract Glass & Aluminium Pty Ltd	51 010 828 047	
G.James Remelt Pty Ltd	38 056 371 076	
G.James Engineering Services Pty Ltd	91 057 404 485	
Cheras Industries Pty Ltd	45 009 674 677	
G.James (N.Z.) Limited	AK/682939	

For the purpose of this statement, references to "G.James" refers both to the reporting entities and, where applicable, other entities which they wholly own or control.

This Modern Slavery Statement will describe G.James' approach to ensuring business is conducted in an ethical manner, to address and minimise the risk of modern slavery and human rights violations across our business and global supply chains. G.James is committed to ensuring modern slavery is not present in any of its supply chains and is working closely with its suppliers to ensure they too align with the principles and values both of G.James and the *Modern Slavery Act 2018* (Cth).

This statement has been prepared for the G.James Trading Group of Companies and approved by the principle governing body – the Board of Directors of the G.James Trading Group Companies, of which the undersigned is Managing Director -

on *12TH NOVEMBER 2021*

For and on behalf of:
G.JAMES TRADING GROUP OF COMPANIES

Mr. Lewis Saragossi



G. JAMES

Company Overview

G. James is one of Australia's leading integrated Glass & Aluminium manufacturers and contractors, with over 2000 employees operating from 32 sites in Australia and New Zealand. It is a wholly Australian owned company, operated by the same family for 104 years. Primarily involved in the manufacture, fabrication, processing, and installation of a diverse range of products, the organisational structure is broken down into the four primary specialisations. G. James Australia Pty Ltd is the parent company responsible for the centralised support functions for the trading group of companies. This includes, but is not limited to the functions of: payroll, finance, accounts payable, accounts receivable, human resources, ICT, product design, and procurement. The group procurement department within G. James Australia Pty Ltd oversees the procurement function of all the associated entities under the direction of the Group Procurement Manager. The structure allows G. James to streamline procurement where commonalities exist in the organisation, and facilitates regular interaction between the senior procurement team.

Aluminium Products

Extruding standard, geometric, proprietary, structural and DNV certified aluminium extrusions. Support services include die design, powder coat and anodised surface finishing, cut-back & special purpose machining, warehousing and despatch.

Glass Products

Manufactures and markets an extensive range of laminated, toughened, decorative, and painted glass products, in addition to a variety of insulated glass solutions. Four large scale production centres are equipped with state-of-the-art processing facilities to service the needs of building & construction, automotive, marine, rolling stock and security industries.

Façade Solutions

Servicing Australia's building contractors with the expertise and products necessary to realise the successful completion of commercial and high-rise curtain wall projects. An ability to satisfy ever-challenging design aspirations is enhanced by a strong tradition of specialising in bespoke façade and cladding solutions, inhouse capabilities and support services along with the advantages of Australian based manufacturing.

Windows & Doors

An Australia wide network of manufacturing branches supplying the housing and construction market with a comprehensive range of windows, doors and associated screening products. Commercial contracting capability along with the benefits of locally based operations complete the full-service package offered to our valued customer base.

Each of these divisions' manufacturing and sales operations are overseen by their general managers and supported by key national functional managers, all of whom report to the managing director.

Additional functions within the group are:

QuickAlly

QuickAlly Scaffolding & Access Solutions manufacture an extensive range of durable, high quality, temporary structures all designed for working at heights in complete safety. Proudly Australian made and supported by our industry leading warranty, this range encompasses everything from an aluminium step-up, through to a customised work platform, and right up to multi-level building perimeter scaffolds.

Gossi Park and Street Furniture

Gossi Park and Street Furniture offer a core range of attractive, low maintenance furniture constructed from a selection of aluminium and/or timber components. This range is complemented by stylish aluminium shelters, non-combustible bin surrounds and other park enhancements such as bollards, drinking fountains and bike racks, making Gossi the obvious choice for park or streetscaping projects.

Cheras Industries

Specialising in the production of aluminium castings for commercial, rural, marine and general-purpose applications. These include lawn mower bases, trailer wheels, roof tile pallets, lighting and irrigation components, zinc anodes and structural castings.



G.JAMES

Supply Chain

G.James deals primarily with Australian supplier entities, with approximately 10% of our spend on G.James' largest material purchases relating to raw materials used in our manufacturing processes. This includes Aluminium Billet, Glass, Aluminium Mesh, Timber, and Paint.

Raw Materials

Approximately 80% of our Aluminium is sourced locally while the remainder of our requirements are imported. In FY2021 we had two international suppliers, one long-term supplier based in Qatar, and a new supplier in Bahrain. Primarily glass sheets are manufactured in Victoria, Australia which accounts for approximately 70% of the glass volume processed in our facilities, while secondary suppliers located in Indonesia and Europe (14%); Thailand (12%); the United States of America (2%); the Peoples Republic of China (2%) supply the subsequent 30% of raw

Identified Risks Relating to Modern Slavery

The number of active approved suppliers in the FY2021 has decreased by 15% to 2537 suppliers, however G.James recognises that we are not immune to risk in our extended supply chain. While there were no severe human rights violations detected in our own operations in FY2021 and the risk of incidence of child labour abuse, compulsory or forced labour was low, we do recognise that there is a risk of forced or compulsory labour among suppliers in the Middle East, South America, and Asia for goods used in our business such as rubber, timber, clothing and promotional materials. Following the release of the March 1, 2020 report by the Australian Strategic Policy Institute titled '*Uyghurs for sale*' G.James has identified exposure to exploited labour within our supply chain. The report claimed that 27 factories in nine Chinese provinces were using exploited Uyghur labour, listing 82 global brands which use products from these factories in their supply chains. The brands in which G.James have

material. Aluminium Mesh is sourced from an Australian enterprise, however we identify that this product is manufactured in one of two facilities based in Thailand and Taiwan respectively. Timber as a raw material is procured from four local suppliers, however we do recognise that dependant on the species and specifications, these products may be sourced from local and imported products. Paint and finishing powder are procured from three major suppliers, two of which are Australian, while our specialised glass printing inks are imported from Israel. Our largest hardware and component supplier is also an Australian based company. Products and components from this supplier are both locally produced, and imported from the Peoples Republic of China, and New Zealand for assembly in Australia.

In this FY2021 reporting period, the import of Raw Materials increased by 10% of our total spend, largely due to the increasing demand on these products globally creating shortages through our approved supply partners

identified within our assets include Apple, Cisco, HP, Lenovo, Microsoft, Samsung, Toshiba and ZTE. While we do not wish to align ourselves with companies who are directly benefiting from the use of exploited labour, we understand that the occurrence of modern slavery is complex, hidden and challenging to address.

As a part of the due diligence process, we have identified that the most likely risk of exposure to Modern Slavery Act breaches to be via third-line supply chain partners of our primary Australian suppliers. This could arise where G.James is sourcing materials and/or services from Australian-based companies who in turn directly source these goods and/or services from overseas – particularly from developing countries where human rights violations and/or other employment related breaches may not actively be policed or punished.



Actions taken to mitigate the risk to Modern Slavery

As a national company with a global supply chain, ensuring responsible conduct is important throughout the G.James value chain. We must consider our impact on society – spanning from manufacture to divestment, as well as the exposure to corruption and human rights violations within our own operations and supply chain. During the reporting period, we engaged in a strategy to mitigate these risks by strengthening due diligence and risk mapping procedures, while training staff on Modern Slavery. Furthermore, we exclude ourselves from trade with countries subject to trade and economic sanctions to limit exposure to risk.

The Group Procurement department oversees the procurement function throughout the G.James trading group of companies, with the Procurement Team being representatives from each division who are accountable to both the group procurement manager, and their own respective division. Throughout FY2021 group procurement have prioritised:

- Formalising supply agreements with its primary suppliers to clearly articulate the obligations of both parties in the supplier-customer relationships. These agreements deal with among other things the obligation for suppliers to adhere to all laws, regulations and awards relating to their employee’s remuneration and safety.
- Drafting of supplier terms and conditions commenced, with the inclusion of a Modern Slavery clause.

- Survey of Tier One Suppliers representing 80% of our value chain.

Moving forward, G.James has recognised a requirement to further develop our supply agreements to recognise the Modern Slavery Act as an essential term of any agreement and to enforce the obligation for G.James’ suppliers to require the same undertakings from their suppliers and supply chain. In addition to this, G.James will move to improve our adherence to the Act by continuing to administer specific Mandatory Slavery Act surveys and declarations to suppliers to further establish whether any other potential exposures exist within our group.

Supply Chain Review

An audit of any potential risks of modern slavery practices across the groups highest spend direct supply chain has been undertaken. Tier One suppliers representing approximately 80% of our direct supply chain were assessed and asked to respond to our survey. Based on the responses, we have now mapped 19% of our supply chain, and have identified low exposure to risk. Findings from the survey found that over 60% of our primary suppliers had policies in place to mitigate the risk of modern slavery practices in their supply chain. 50% of these suppliers had high Visibility in their own supply chain, 17% had Moderate, and 33% were developing their mapping of supply chain to identify risks.





G. JAMES

G. James' supplier and business partner requirements regarding social and environmental responsibility are, as stated in our procedures, an integral part of all stages of the procurement process. The requirements cover issues related to human rights, anti-corruption and bribery, and working conditions.

The requirements are set out in several G. James policy documents to be read in conjunction with each other – 'G. James Procurement Policy Statement', 'G. James External Supplier/Provider Policy Statement' and the 'Ethical Sourcing Policy Statement.' These documents will be updated in 2022 to reflect changes to relevant legislation and G. James' commitment to human rights. In addition to these, G. James applies the principles of these policies in contractual clauses, Key Performance Indicators (KPI's) and supplier selection criteria to ensure suppliers and business partners reflect the values and principles that G. James promotes internally and externally.

Training, capacity building and responsible behaviour

Human rights responsibilities are an influencing factor in G. James' Conditions of Employment and policies related to external suppliers/providers. Training on these conditions is offered to all employees, with additional training offered to functions involved in procurement and social responsibility on a regular basis. All policies and statements are available to all employees.

An important contribution toward respecting human rights is to secure decent working conditions in our organisation and promote the same standards in jointly operated companies, and with our suppliers.

Should there be any queries with any of the information included herein, please refer to our Managing Director Mr. Lewis Saragossi (lewis_saragossi@gjames.com.au).

Grievance - or complaint - mechanisms are important to understand the impact of G. James' operations on the rights of individuals and groups affected by our operations. Grievances of any kind, including social and environmental issues, can be made anonymously. In situations where we identify adverse human rights impacts, we work to mitigate, prevent, address and remedy potential adverse impacts as recommended in the UN guiding principles on Business and Human Rights. G. James will not tolerate retaliation against anyone who speaks up in good faith to ask a question, raise a concern, reports a suspected violation, or participates in an internal company investigation. We have several grievance mechanisms depending on stakeholder groups.

G. James' framework for human rights management, risk mapping procedures and strengthening of due diligence procedures will remain on a continuous improvement basis through to FY2022.

All documents listed under references below are also valid for the G. James Trading Group of Companies subject to the Modern Slavery Act 2018. Several G. James Policy Documents are relevant for our work against modern slavery.

These include, but are not limited to:

- POL.A11.02 Procurement Policy Statement
- POL.A12.0 External Supplier/Provider Policy Statement
- POL.A13.02 Ethical Sourcing Policy Statement
- G. James Conditions of Employment
- G. James Workplace Health & Safety Handbook