Stoddart Group Modern Slavery Statement 2020

1. INTRODUCTION

STODDART

This is the Modern Slavery Statement for Stoddart Group Pty Ltd ACN 010 744 751 and its subsidiaries and associated entities, which include Stoddart (S.E. Queensland) Pty Ltd ACN 054 816 590, Stoddart (Victoria) Pty Ltd ACN 060 855 478, Stoddart (NSW) Pty Ltd ACN 003 979 566, Stoddart Energy Systems Pty Ltd ACN 613 897 028, Scope Safety Systems (Victoria) Pty Ltd ACN 135 953 034, Stoddart Cladding Systems Pty Ltd ACN 603 759 995 and Steel House Frames Australia Pty Ltd 068 324 121, collectively, "**Stoddart Group**," "**we**," "**our**") for the financial year ending 2020.

2. OVERVIEW

Stoddart Group is a group of privately owned Australian companies, which was originally founded more than 60 years ago. We have since become Australia's leading supplier and installer of products to the residential building industry. We have branches located across Australia and employ approximately 600 employees.

The passing of the Modern Slavery Act 2018 (Cth) ("**Act**") requires Stoddart Group to furnish annual reports in relation to the risks of modern slavery in our operations and supply chain, the actions we have taken to assess and address those risks, and the effectiveness of those actions

We recognise that Australia is not immune from modern slavery and that we play an important role in protecting and promoting human rights and dignity. We have a zero-tolerance approach to modern slavery in our operations and supply chain and are committed to at all times acting in an ethical and transparent manner.

While we acknowledge that modern slavery may exist in any complex global supply chain, particularly in those regions deemed to be 'higher risk,' we are not currently aware of any practice within our operations or supply chain which may constitute modern slavery.

3. ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

Stoddart Group has implemented several measures designed to protect and promote human rights, and to mitigate the risk of modern slavery in our operations and supply chain.

These measures include the implementation of an internal modern slavery policy, an upstream supplier questionnaire, and this modern slavery statement. We also intend on very shortly implementing additional measures, including a sustainable procurement policy, and





the inclusion of provisions in our current agreements with our suppliers to ensure that goods supplied to Stoddart Group have not been sourced or produced using modern slavery.

It is our expectation that all of our suppliers will comply these measures. We are committed to working with each of our suppliers to ensure they fully understand their obligations and are compliant with all of our policies.

4. OUR SUPPLY CHAIN

Stoddart Group sources materials and products from an international and national network of key suppliers, through a careful and considered screening process.

Stoddart Group's current international suppliers are located in the Philippines, New Zealand, China, South Korea, Ukraine, and India.

We expect our suppliers to conduct their operations in a socially and environmentally responsible manner. Although we have taken steps to ensure that our employees and suppliers are not affected by modern slavery, we acknowledge the possible existence of modern slavery practices by those suppliers operating in countries which are considered to be 'higher risk' for such practices.

To date, we have not been made aware of any modern slavery activities within our supply chain, but if any concerns are identified, they will be acted upon immediately.

Our framework to identify modern slavery risks will be reviewed annually to assess its effectiveness in evaluating the risk of modern slavery throughout our operations and to address any areas of concern.

5. CONTINUOUS IMPROVEMENT AND OUR ONGOING COMMITMENT

Stoddart Group is committed to combatting modern slavery through continuous review and improvement of our systems and processes.

As part of our commitment to continuous improvement, we will be:

- (a) implementing education and training for our leadership team, managers, contractors, and employees (with a focus on those responsible for procurement) to identify and report any risks of modern slavery in respect of our current (and future) suppliers;
- (b) implementing a 'Whistle-blower & Modern Slavery Hotline' to encourage our employees to report any genuine concerns regarding modern slavery;
- (c) implementing a sustainable procurement policy and bolstering our screening process for future suppliers; and





(d) completing an in-depth risk assessment of our current supplier base (as well as any future suppliers moving forward) with a particular focus on those suppliers deemed to be located in geographical locations deemed to be 'high risk.'

The effectiveness of these processes will be assessed through internal review and periodic internal audits.

In line with our obligations under the Act, Stoddart Group will produce an annual statement highlighting any modern slavery risks as identified in our operations or supply chain and summarising the measures we have has taken to mitigate those risks during the relevant period.

This modern slavery statement has been approved and endorsed by the board of management of Stoddart Group.

Jon Stoddart Governing Director Stoddart Group

