

Financial Year - June 2024

Modern Slavery Statement

Hobson Engineering Co Pty Ltd
(ACN 000 289 958)

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Modern Slavery Statement

Hobson Engineering Co Pty Ltd (ACN 000 289 958) (**Hobson Engineering** or **Hobson**) is committed to challenging and eradicating modern day slavery from our supply chains and ensuring our policies and procedures protect the rights of all employees and companies we provide services to.

This statement is made for Hobson Engineering covering the financial year ending 30 June 2024.

1 OUR BUSINESS, STRUCTURE, OPERATIONS AND SUPPLY CHAINS

BACKGROUND

Established in 1935, Hobson Engineering is a family owned and operated business that has grown to become Australia's leading wholesale supplier of fasteners, bolts, screws, anchors, rivets and threaded rods. Hobson Engineering offers the highest quality fasteners, along with a commitment to large stock holdings and excellence in customer service.

With over 85 years of experience providing fastening solutions and the most comprehensive product testing program in Australia, Hobson continues to build strong relationships with customers, suppliers and industry groups to promote the best installation practices and supply the highest quality fasteners to Australia, New Zealand and South Pacific countries.

Hobson values integrity, teamwork, reliability and responsibility. Hobson actively seeks to provide a fulfilling, rewarding and safe environment for all team members and supports the community and environment to actively pursue a safe and sustainable future.

OUR BUSINESS

Hobson Engineering's product range incorporates the following key fastener products:

- Threaded rod (allthread)
- Mild steel bolts, nuts and washers
- High-tensile bolts, nuts and washers
- Structural bolting assemblies
- Stainless steel bolts, nuts and washers
- Stainless and high tensile socket screws
- Self-drilling and self-tapping screws
- Mechanical and chemical masonry anchors
- Petrochemical stud bolts and nuts
- Nylon bolts, nuts and washers
- Earthmoving fixings
- Stainless hardware and wire rope

- Stainless metal thread screws and self-tappers
- Builders' hardware, incorporating builders strap and timber supports
- Aluminium, steel and stainless steel rivets
- Bent bolt products (eyebolts, U-Bolts, L-Bolts etc)
- Screwdriver bits and associated accessories
- Assortment fastener kits

In addition to standard fasteners, Hobson Engineering acts as the wholesaler and master distributor of innovative specialty products, including the following international brands:

- BUMAX®: high-tensile stainless steel fasteners
- SCHNORR®: disc springs and specialised locking washers
- Nord-Lock®: two-part anti-vibration washers
- Applied Bolting Technology®: Squirter® Direct Tension Indicator (DTI) Structural Washers
- TONE® electric torque wrenches
- Mungo® chemical, foam, mechanical masonry anchors and SDS drill bits

Hobson Engineering's major brand names that are known and trusted by the industry are:

- SAMPSONROD®
- DRILLX®
- SOKO®
- TYGABOLT®
- NYLOC®
- CLAWBOLT®
- PANTHA PLUG®
- CONXTRACT®
- impaX®
- NEPTUNE®

ORGANISATIONAL STRUCTURE AND OPERATIONS

Hobson Engineering's head office and warehouse is in Sydney, Australia. Hobson maintains a quality management system certified to ISO 9001.

Hobson Engineering maintains offices and warehouses in the following locations:

Sydney:	10 Clay Place, Eastern Creek, NSW	Ph (02) 8818 0222
Newcastle:	50 Elwell Close, Beresfield NSW 2322	Ph (02) 8818 0222
Melbourne:	49-61 Marconi Dr, Dandenong South VIC 3175	Ph (03) 9797 3333
Brisbane:	56 Axis Place, Larapinta QLD 4110	Ph (07) 3273 0777
Townsville:	2/788 Ingham Rd, Mount Louisa QLD 4814	Ph (07) 3273 0733
Perth:	133 Beringarra Ave, Malaga WA 6090	Ph (08) 9241 9888
Adelaide:	1-5 Caribou Drive, Direk SA	Ph (08) 9241 9899

During the June 2024 financial year, Hobson Engineering employed approximately 115 employees across the following categories:

- a. Internal office staff (approximately 45 employees) – including management and senior executive staff, junior executive staff and junior office staff (for example, accounts, internal sales, purchasing, graphic design and IT support).
- b. External office staff / account development executives (approximately 15 employees) – whose positions include being on the road work at client sites and offices.
- c. Warehouse staff (approximately 55 employees) – including supervisors, lab technicians and warehouse workers.

The work performed in our warehouses includes picking, packing, storage and preparation of products before distribution.

During the June 2024 financial year, Hobson Engineering engaged an average of 35–40 labour hire staff to assist with its warehouse operations in Australia.

Hobson owns and operates a National Association of Testing Authorities (NATA) approved laboratory and product testing facility at its Sydney location that is accredited to ISO 17025.

Supplier subcontract to two independent overseas laboratory testing facilities in China to test our products before they are shipped out of China. The Chinese laboratories are accredited by the China National Accreditation Service (CNAS) and regulated in accordance with the standards of the International Laboratory Accreditation Cooperation (ILAC). There are approximately 25 staff working in these overseas laboratories.

All high-tensile products are checked and tested in both of laboratories before they are released for sale. Test certificates from both the factory of manufacture (Factory Production Control [FPC] and the independent Hobson Engineering laboratory are available to our customers at time of order and post-order.

OUR SUPPLY CHAIN

Hobson Engineering deals with a number of its suppliers directly for items that are obtained for wholesale purposes and various operational ancillary services.

Hobson Engineering's supply chain is made up of more than 600 contracted suppliers across more than 12 countries.

Our suppliers and partners are categorised as follows:

1. Marketing services, creative content, design and event management.
2. Human resource services and recruitment.
3. Accounting and finance.
4. Professional services, including legal and tax advice.
5. Freight, transportation and packaging supplies.
6. IT and cloud services, including hardware, software supplies, maintenance, web-hosting and design.
7. Office, administration-related services, supplies, cleaning and courier services.
8. Procurement of fastener parts and manufactured products.
9. External laboratory and testing services.

Products and services from our established suppliers assist our brand. Our key suppliers are in the manufacturing industry and develop and create the Hobson Engineering products we test and sell.

Hobson products are supplied to Australian, international and Hobson specifications as listed on the product description from a range of established suppliers in Asia.

BUMAX® manufactures premium high-tensile stainless steel fasteners in a variety of grades to provide optimal safety and reliability in the most demanding applications. BUMAX® manufactures at its plant in Åshammar in Sweden's steel district and employs over 70 highly skilled workers, as well as technical salespeople around Europe.

SCHNORR® manufactures quality disc springs for a wide variety of applications. SCHNORR® manufactures its products in Sindelfingen and Engen in Germany and employs approximately 240 employees in Germany with international subsidiaries.

Nord-Lock Group® manufactures quality two-part vibration washers and mainly manufactures its products in Sweden, with some specialty products manufactured in Pittsburgh, USA.

Applied Bolting Technology® manufactures quality Squirer® Direct Tension Indicator (DTI) washers in Rockingham, Vermont, USA.

TONE® Bolting Solution Company manufactures quality electric torque wrenches and professional tools, and was established in Osaka, Japan.

Mungo® manufactures quality chemical and mechanical masonry anchors. Mungo®'s head office and production facility is in Olten in Central Switzerland, while chemical products are manufactured in Germany.

DRILLX® is a Hobson developed brand covering our screw range and supplied by various factories in China and Taiwan.

2 RISKS OF MODERN SLAVERY PRACTICES IN HOBSON ENGINEERING'S OPERATIONS AND SUPPLY CHAINS

As a wholesaler, Hobson Engineering procures products for its clients from third-party suppliers, some of which are described above.

The products of third-party suppliers are predominantly sourced through Hobson Engineering's established overseas suppliers.

Our teams listed above have suppliers in the following locations:

1. Australia
2. Bulgaria
3. China
4. France
5. Germany
6. India
7. Indonesia
8. Italy
9. Japan
10. Korea
11. Slovenija
12. Sri Lanka
13. Sweden
14. Switzerland
15. Taiwan
16. UK
17. USA
18. Vietnam

The advanced fastener products described above are procured from a global supply chain, which heightens the risk of purchasing from operations or countries where slavery may be taking place. With this in mind, we take all reasonable steps to ensure we source responsibly.

We acknowledge that our sales team and distributor network have operations in high-risk sectors and emerging markets, including selling fasteners and related products to large multinational global businesses, including mining, construction and property development companies in developing countries. We acknowledge that some countries are identified as higher risk under the Modern Slavery Index published by the Walk Free Foundation. In managing our suppliers, Hobson Engineering seeks to comply with all laws and regulations and ensure ethical business practice.

Hobson Engineering's suppliers are typically larger organisations. For this reason, Hobson Engineering considers the risks of modern slavery to likely be beyond the first tier of Hobson Engineering's supply chains. We acknowledge that Hobson Engineering's suppliers may outsource tasks, including manufacturing products, which may increase the risk of exploited labour.

3 ACTIONS HOBSON ENGINEERING TAKES TO ASSESS AND ADDRESS THESE RISKS

We are committed to upholding practices against modern slavery or human trafficking in our supply chains and all parts of our business.

Hobson Engineering employs staff in accordance with Australian law and the laws of each State and Territory in which it operates. Hobson Engineering ensures that it pays wages as per federal and state legislation, industry guidelines and benchmarks. These operations are closely managed by Hobson's Engineering's Management Team.

Hobson Engineering is committed to acting ethically and with integrity in all of our business relationships. Our commitment is also supported by policies and procedures which ensure responsibility and accountability for improving business practices and eliminating modern slavery in supply chains at all levels of our business.

Hobson Engineering aims to never cause or contribute to modern slavery and continues to conduct its due diligence to identify, prevent, mitigate, account for and address modern slavery risks. Hobson Engineering recruits professional staff in our Management Team and takes advice from external legal advisors to check working conditions and ensure that we are complying with local laws and guidelines.

As stated above, Hobson Engineering is committed to maintaining its relevant NATA accredited laboratories for fastener testing. We ensure all staff work in a safe environment and that risks to health and safety are minimised.

In terms of our international suppliers, Hobson Engineering only deals with established reputable companies and conducts its own due diligence to understand their operational model, history, sourcing and trading patterns before engaging with them. The Hobson Engineering Purchasing Team conducts regular visits to suppliers to review operations and business practices to ensure highest ethical standard is maintained. These site visits are also supported by ongoing contact and check-ins with our suppliers to keep updated of any changes in their manufacturing or their supply chain process, and ultimately to build a strong working relationship based on proper business practices and work ethics.

Hobson Engineering's suppliers are requested to complete a self-assessment questionnaire on their current workplace arrangements and supply chains in order to assist the identification of modern slavery risks, foster collaborative efforts between suppliers and Hobson Engineering to address these risks, improve transparency in the supply chain and identify areas for further due diligence.

This self-assessment questionnaire is to be completed by all suppliers on a biennial basis. All responses are to be reviewed by Hobson Engineering Senior Management and Purchasing teams.

Not only that we organise site visits to Suppliers but regular visits by Suppliers to our site is also arranged for various meetings and discussions regarding our operations and supply chain processes including understanding of our corporate ethic.

OUR POLICY FRAMEWORK

The Management Team at Hobson Engineering has overall responsibility to establish and enforce policies.

We do our utmost to act with integrity, honesty, trust, respect and fairness. If employees are aware of any violation of the law or company rules, including any modern slavery practices, we encourage them to contact their supervisors for complaints, grievances and suggestions immediately.

If employees require assistance to report grievances or concerns, they are encouraged to report to their manager or the Chief Operating Officer.

Our Workplace Code of Conduct aims to provide employees with a workplace free from slavery, discrimination, harassment and bullying, and aims to provide employees with a reference guide on how to appropriately conduct themselves at work.

Hobson Engineering takes its obligations under work health and safety and other workplace legislation seriously. In the event of a breach of our Workplace Code of Conduct, Hobson Engineering takes appropriate disciplinary action against employees that do not conform to the standards of ethics and integrity the business upholds.

Hobson Engineering promotes the following key principles in the workplace, which are encompassed in the Workplace Conduct Policy:

1. Respect for others.
2. Respect for self.
3. Respect for the company's clients.

Hobson Engineering employs trained and competent managers and supervisors to:

1. Monitor the work environment to ensure that acceptable standards of conduct are always observed by employees.
2. Ensure that grievance pathways are made known to employees.
3. Promote the Workplace Code of Conduct within their area of responsibility.

4. Treat all complaints about unacceptable workplace behaviour seriously and confidentially and take prompt action to assist an employee who has made a complaint.

Hobson Engineering also has a comprehensive Work Health and Safety Manual in place, which is regularly updated in accordance with the health and safety standards of the industry.

The Work Health and Safety Manual includes a detailed Dispute Resolution Policy and Procedure, where employees are encouraged to report issues, risks and incidents immediately to a superior, a senior employee of Hobson Engineering or a representative on a worksite.

The Work Health and Safety specifically details our Dispute Resolution Officers, the state in which they are located, their contact numbers and email addresses. Dispute Resolution Officers are trained to identify key risks and are responsible for ensuring that:

1. Issues are resolved with reasonable promptness.
2. Consultation occurs between all parties involved.
3. Serious issues are subject to investigation.

When a dispute remains unresolved, a Dispute Resolution Officer will appoint an external third-party investigator to assist in achieving a resolution. In some cases, while Hobson Engineering is conducting its own investigations or engaging third-party investigators, it suspends the alleged individual or group involved.

If any investigation makes positive findings of bullying, harassment or other prohibited conduct including modern slavery, immediate disciplinary action will be taken, including termination of the relevant employee/s or supplier relationship where appropriate.

Our Work Health and Safety System details the relevant work health and safety regulators in each relevant jurisdiction of Australia. As our business model is built on transparency, we take steps to ensure our employees and other workers are aware of their rights under the work health and safety laws in each state jurisdiction.

Additionally, our Work Health and Safety System ensures that all employees are aware of our Equal Opportunity & Anti-Discrimination Policy. It is the policy of Hobson Engineering that all persons in the workplace be treated based on merit and according to their skills and abilities.

This includes, but is not limited to, matters involving:

1. Recruitment, selection, transfers, promotions, performance reviews, training and development, supervision and management of staff, counselling, disciplinary procedures and termination of employment.
2. Remuneration practices and benefits.

An employee's sex, marital status, pregnancy, parental or family responsibilities, race, age, physical or mental disability, sexual orientation, gender identity, political or religious beliefs, social origin, trade union activity or inactivity, or physical appearance will not form the basis of employment decisions

TRAINING

Training is an integral part of our business framework. It ensures that all employees are aware of their responsibilities.

All new employees are required to review, acknowledge and sign our Workplace Code of Conduct and Work Health and Safety Systems on induction, which details our core values and responsibilities. Aspects covered during the onboarding and induction of new employees include our values, code of conduct, key policies, health and safety, discrimination, bullying and harassment policies.

Hobson Engineering has determined training needs and training plans to create awareness of the signs of modern-day slavery.

4 HOW HOBSON ENGINEERING ASSESSES THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS THESE RISKS

Hobson Engineering is committed to assessing the effectiveness of actions being taken to assess and address the risks of modern slavery within its operations.

Suppliers to Hobson Engineering are requested to complete a self-assessment questionnaire on their current workplace arrangements and supply chains to identify possible risks of modern slavery within our supply chains. Out of the 63 Self-Assessment Questionnaires sent last 2023, we received 38 responses. We have summarised and analysed all the responses. Results showed findings and areas of concern that needed to be clarified or actioned by the Suppliers. Hobson Engineering is now actively working with suppliers to address perceived risks as they are identified.

Hobson Engineering will regularly assess the effectiveness of the actions being taken to address modern slavery risks as they are implemented in our supply chain.

5 CONSULTATIONS

This statement has been prepared in consultation and cooperation with the Hobson Engineering Management Team. This consultation process included engagement at the director level and an individual team's level to prepare this statement.

This statement was approved by the Board of Hobson Engineering.



Peter Charles Hobson

Director, Hobson Engineering Co Pty Ltd