



Modern Slavery Statement

Access Hardware Holdings Pty Ltd

December 2024

Modern Slavery Statement

Introduction

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (“the Act”).

Reporting Entity

This Modern Slavery Statement is a single statement made by Access Hardware Holdings Pty Ltd (ACN 123 214 611) and its subsidiaries which are listed in Schedule 1 attached to this statement.

Access Hardware is committed to respecting human rights and conducting business in an ethical and socially responsible manner. We oppose abuses of a person’s freedoms in our direct operations, our indirect operations and our supply chain, and recognise the importance of addressing our role in combatting the problem of modern slavery and human trafficking, as crimes that affect communities and individuals across the globe.

We operate with integrity, transparency, aiming to implement and enforce effective systems and controls to minimize the risk of modern slavery and human trafficking taking place anywhere in our business or in any of our supply chains.

This statement assesses and addresses modern slavery risks in the operations and supply chain of Access Hardware and details the steps put in place to deliver against our goals during the financial year 1st July 2023 to 30th June 2024.

Criteria required under the Act	Page No
Identify the reporting entity	1
Describe the reporting entity’s structure, operations, and supply chain	2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	3
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	4
Other information relevant to the statement	5
Describe how the reporting entity assesses the effectiveness of these actions	7
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	9



Organisational structure and supply chains

Established in 1975, Access Hardware is a privately owned Australian company, our core operation being the supply of door hardware and locking systems for commercial and residential applications.

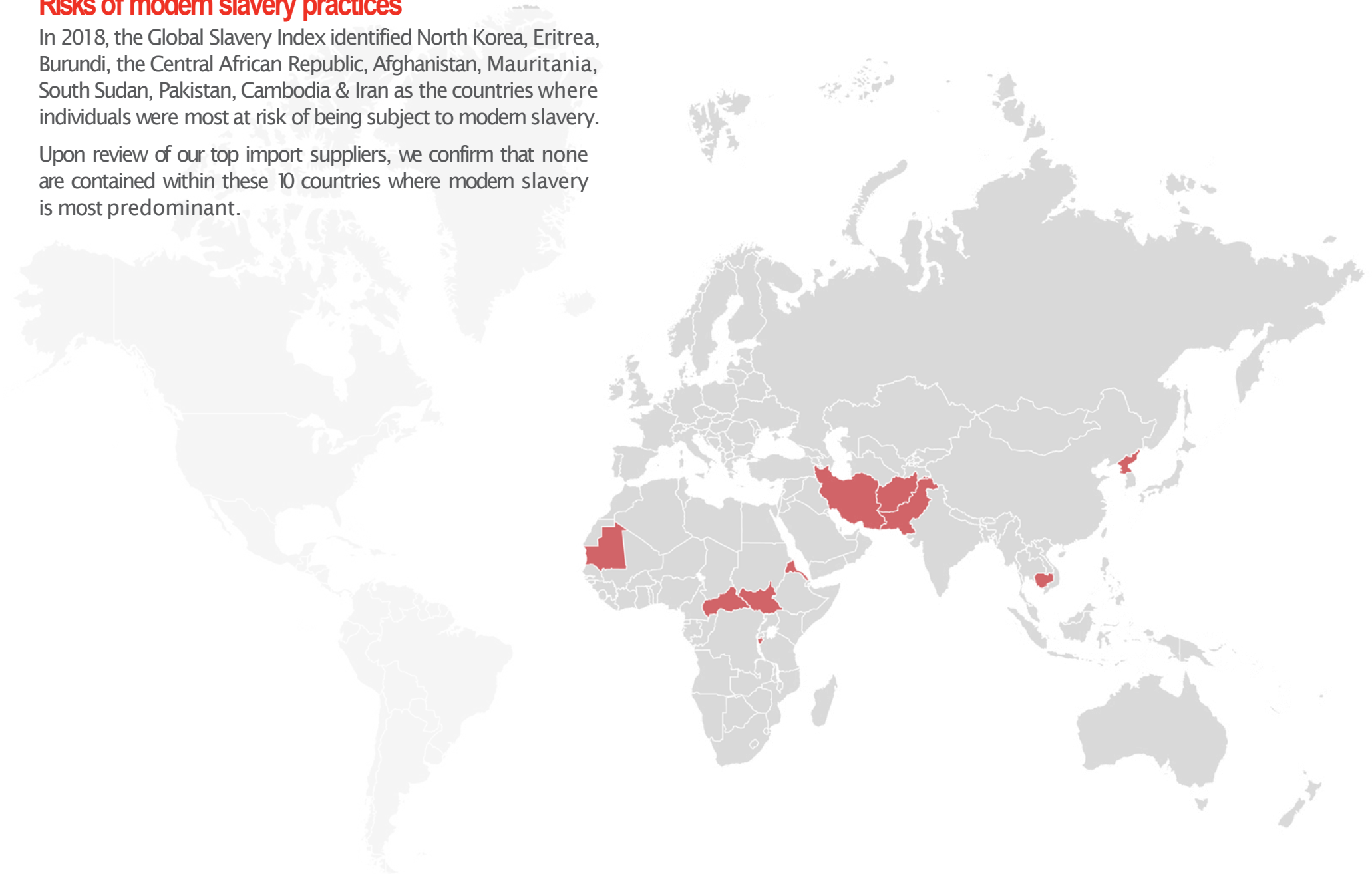
Access Hardware and its business entities consist of wholesaling, distribution, direct product sourcing, locksmithing, the installation of security products and manufacturing of doors.

We have sites in most states and territories across Australia, employing approximately 270 staff. Currently, we primarily trade in the Australian market with product that is sourced from various local suppliers as well as from countries outside of Australia including (but not limited to) China, United States of America, United Kingdom and New Zealand.

Risks of modern slavery practices

In 2018, the Global Slavery Index identified North Korea, Eritrea, Burundi, the Central African Republic, Afghanistan, Mauritania, South Sudan, Pakistan, Cambodia & Iran as the countries where individuals were most at risk of being subject to modern slavery.

Upon review of our top import suppliers, we confirm that none are contained within these 10 countries where modern slavery is most predominant.





Actions taken to assess and address those risks, including due diligence and remediation processes

Access Hardware are committed to continuous improvement and regularly review and update our policies and procedures to address emerging risks and challenges. We work collaboratively with our suppliers, stakeholders, and industry partners to share best practices and promote responsible business practices. We expect our suppliers to comply with legislative obligations and include questions pre acceptance and clauses in contracts specific to identifying and eliminating the risks of modern slavery in the supply chain.

Other actions to reduce risks around modern slavery practices include the implementation of various policies and procedures which must be adhered to by employees, management, and suppliers.

Other information relevant to the statement

The following policies within our organisation describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing policy is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** Our code makes it clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing the supply chain.
- **Supplier/Procurement code of conduct** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Our Supplier/Procurement code of conduct has a dedicated section in relations to Human Rights and Labor Standards to ensure that all our business partners are aligned with our expectations. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat employees with dignity and respect, and act ethically and within the law in their use of labor. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions.

However, serious violations of our supplier code of conduct will lead to the termination of the business relationship. All suppliers that we

classify as a mid to high risk or coming from a region that may be classified as a higher risk are required to complete documentation outlining that they abide by our modern slavery code of conduct.

- **Recruitment/Agency workers policy** We use only specified, reputable employment agencies in our internal human resource departments to source labor and verify the practices of any new agency that it is using before accepting workers from that agency.
- **Due diligence** We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:
 - mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking.
 - evaluating the modern slavery and human trafficking risks of each new supplier.
 - reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
 - conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified.
 - invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we have:

- developed a system for supply chain verification, whereby we evaluate potential suppliers before they enter the supply chain; and
- reviewed our existing supply chains whereby we evaluate all existing suppliers.

Training

We maintain a continuous focus on training and collaboration to improve awareness and knowledge amongst our team members. We require Managers, Marketing, HR, Sales and Supply Chain staff within our organisation to complete training on modern slavery.

Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labor engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.



Effectiveness of Access Hardware's actions

Access Hardware continue to assess the effectiveness of its actions in comparison to industry standard and practices.

Access Hardware have a range of ways on how we assess the effectiveness of its actions, including:

- Established process to review the actions we have taken, including quarterly review by our Modern Slavery Working Group.
- Internal audits of specific steps taken to assess and address modern slavery risk.
- Working with suppliers to check how they are progressing, including any actions they have put in place to address modern slavery risks.

Responsibility for our anti-slavery initiatives

- **Policies:** Responsibility for putting in place and reviewing policies and the process by which they were developed is shared between the National Operations Manager and the Chief Operating Officer.
- **Risk assessments:** Responsibility for putting in place the process and broad organisational responsibility for human rights and modern slavery risk analysis is shared between the National Operations Manager and the Chief Operating Officer.
- **Investigations/due diligence:** Responsibility for ongoing investigations/due diligence falls under Supply & Logistics Department headed by the National Operations Manager.
- **Training:** Training has been provided for key staff whose roles expose them to human rights and modern slavery practices. This training will be completed and refreshed at a minimum every two years and covers all operating entities under Access Hardware Holdings Pty Ltd.

To date, Access Hardware has not found any supplier to be in breach of any modern slavery legislation or in breach of other supplier policies held by Access Hardware.



Future commitment

Access Hardware remains dedicated to retaining and further strengthening practices that continuously reduce any possible slavery and human trafficking risks. Over the next year our commitment will be:

- Modern Slavery working group to continue to meet every quarter to review our current risk assessment process, action plans, training, future commitments and review of our Modern Slavery Statement.
- National Operations Manager to continue reviewing our supply chain to identify any weaknesses and rectify any areas of concern.
- Completion of Modern Slavery self-assessments by key suppliers including ongoing engagement and consultation with suppliers to identify and prevent slavery within the supply chain.
- Review and update training module where required to ensure relevance and effectiveness.
- Continuously review and improve current policies & processes to include specific references to Modern Slavery & Human Trafficking.
- Continue to raise awareness on the policy.
- Redevelop our supplier onboarding forms to user-friendly digital versions.
- Redevelop our Modern Slavery risk assessment framework.
- Develop a dashboard to review overall results and risks.

Access Hardware will continually review its suppliers for any increased risks and update all relevant supplier agreements and employee policies and training as modern slavery laws evolve.



Consultation with entities owned or controlled by
Access Hardware Holdings Pty Ltd

Access Hardware Holdings Pty Ltd, has the ultimate oversight of all Access Hardware entities in the context of key matters dealt with by this statement.

Access Hardware Holdings Pty Ltd, is responsible for its group members and their employees.

All entities owned and/or controlled by Access Hardware (as listed in schedule 1) were consulted in the preparation of this statement via meetings between key internal stakeholders to discuss the activities within the individual business units to better understand modern slavery risks, actions taken across the businesses and the effectiveness of these actions.

Access Hardware will continually review its suppliers for any increased risks and update all relevant supplier agreements and employee policies and training as modern slavery laws evolve.

Approval

This statement was approved by the Board of Access Hardware Holdings Pty Ltd (ACN 123 214 611) (on behalf of its controlled entities) in December 2024, and is signed by Managing Director, Spencer Lowndes.



Spencer Lowndes
Managing Director

Date: 20th December 2024

Schedule 1- Subsidiaries

Legal Entity	Australian Company Number (ACN)
Access Hardware Pty Ltd	006 426 820
Access Corporate Services Pty Ltd	142 688 284
Access Commercial Security Pty Ltd	115 389 707
Access Hardware (S.A.) Pty Ltd	120 943 697
Access Hardware (QLD) Pty Ltd	125 789 497
Access Hardware (NT) Pty Ltd	164 012 195
Access Specialty Hardware Pty Ltd	142 683 770
Access Holdings (TAS) Pty Ltd	151 816 894
Access Hardware (TAS) Pty Ltd	080 370 109
Access Doors (TAS) Pty Ltd	145 480 771
Access Locksmiths (TAS) Pty Ltd	131 987 570