



The Window Furnishings Department Pty Ltd
ATF The Window Furnishings Department Unit Trust

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Modern Slavery Statement

FY 2020

1. Introduction

The Window Furnishings Department Pty Ltd trading as The Shutters Department "The Shutters Department" is opposed to slavery in all its forms, including: slavery; servitude; forced labour; human trafficking; deceptive recruiting for labour or services; debt bondage; forced marriage; and the worst forms of child labour. This statement describes the steps taken by The Shutters Department during the financial year ending 30 June 2020 to assess and address the risk of modern slavery occurring in our operations and supply chains.

Despite not being mandated to do so, The Shutters Department has elected to prepare a voluntary statement that meets the reporting requirements of Australia's Modern Slavery Act 2018 (Cth) and associated guidelines.

2. Our Structure, Operations and Supply Chains

The Shutters Department was established in 2017 with a vision to offer high quality, affordable shutters to custom Australian homes. We have since developed a dependable reputation and are proud to have achieved sustainable growth on a national scale.

The Shutters Department's head office is located in Melbourne. We have a total of 8 team members located across Victoria, Queensland, Tasmania, South Australia and New South Wales.

The products we supply to our clients and customers are produced in a third party owned supplier factory. The Shutters Department has one registered supplier factory located in China.

3. Modern Slavery Risk

The Shutters Department has assessed its modern slavery risks with reference to a number of modern slavery risk indices, including the Walk Free Foundation Global Slavery Index, and information supplied to us through our extensive stakeholder networks (e.g. customers, suppliers, licensors, industry associations and governments).

3.1 Operations

In FY 2020, The Shutters Department assessed the risk of modern slavery in our direct business operations to be low. The Shutters Department has a robust system of HR policies and procedures that ensure compliance with legally mandated employment entitlements and awards across our workforce. The policies apply to all The Shutters Department operated offices and facilities in Australia.

3.2 Supply Chains

The Shutters Department recognises that through the window furnishing products we source from our third party supplier factory and local suppliers, we can be exposed to the risk of modern slavery in the manufacturing process both in Australia and overseas.

The Global Slavery Index has identified a list of 15 imported products common in G20 countries, such as Australia, which present a heightened risk of forced labour. The Shutters Department's primary product (shutters) does not appear on the list, and no raw materials or components used in shutters relate to any products on the list.

4. Risk Mitigation Actions

The need to manage the risk of modern slavery in our supply chain is a key consideration behind the design of The Shutters Department Ethical Sourcing Program. The program is applicable to all Suppliers including Suppliers of the products we sell to our clients and customers, the goods we use in our own operations and our service providers.

Key elements of the program include:

- A comprehensive Supplier Code of Conduct, which includes the minimum sourcing standards that all Suppliers must meet as a condition of doing business with The Shutters Department. The Code contains specific wording prohibiting conduct associated with modern slavery, including child labour, forced labour, human trafficking, non-compliance with local wage laws and unauthorised subcontracting.
- Code compliance declarations that must be signed by all Suppliers.
- A whistle-blower line (compliance@shuttersdept.com.au) through which any person, including workers of a Supplier, may report actual or suspected Code violations.
- A robust audit and monitoring program that requires The Shutters Department supplier factories to have an approved ethical sourcing audit prior to onboarding and renewed at least every two years.
- Due diligence processes applicable to onboarding new local Suppliers, designed to ensure their factories comply with ethical sourcing standards that, at a minimum, meet The Shutters Department standards.
- Staff training.
- A Standard Operating Procedure documenting The Shutters Department Ethical Sourcing Program's governance structure, program objectives, and internal roles and responsibilities.

5. Assessing Effectiveness

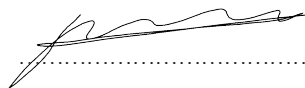
Responsibility for assessing and addressing The Shutters Department's modern slavery risks occurs under the direct oversight of the Managing Directors. The Shutters Department's overall modern slavery risk management approach is reviewed at least annually.

This Statement was approved by Jason Lewis and Ryan Lewis, the two Directors of The Window Furnishings Department Pty Ltd, on 22 January 2021.



Jason Lewis, Managing Director

22 January 2021



Ryan Lewis, Managing Director

22 January 2021