



# Modern Slavery Statement

ABI Interiors Modern Slavery Statement FY24



# Contents

About this Statement	4
Co-founder’s Statement	5
Company Overview	6
Modern Slavery Risks	10
Action Plan to Address Modern Slavery Risks	12
Assessing our Actions	15
Joint Statement	16
Future Steps	17



# About this Statement

This statement is given by ABI International Holdings Pty Ltd (ABN 44 643 806 679) (ABI Interiors), under section 14 of the Modern Slavery Act 2018 (Cth) and section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 (UK act), and covers the activities of ABI Interiors and the entities owned and controlled for the financial year 1st July 2023 to 30th June 2024 (Reporting Period). This statement was approved by the board of ABI International Holdings Pty Ltd in their capacity as principal governing body of ABI International Holdings Pty Ltd on 1st October, 2024.

# Co-founder's Statement

ABI Interiors has changed immensely from our humble beginnings in 2016 to a global presence with a complex supply chain. We recognise the growing responsibility to address the risks of modern slavery within our operations. The growth of our business necessitates a more formal and rigorous approach to tackling these risks. This, our first modern slavery statement, reflects our commitment to this critical issue.

During this statement period, our focus has been on the areas where we face the greatest risk, but also where we exert the most control. As a product-based business with a dedicated team on the ground to manage our supply chain, we have concentrated our efforts on ensuring ethical practices throughout our supply network. Central to this effort has been nurturing strong, transparent relationships with our suppliers,

reinforced by regular face-to-face meetings, site visits, and an on-the-ground presence in regions where we manufacture goods. This hands-on approach is central to our mission of combating modern slavery and ensuring our growth is sustainable and responsible.

As a privately owned business, our success is deeply rooted in the strength of our relationships—whether with our people, customers, or community. Our relationships with suppliers are integral to this success. We are committed to fostering strong, mutually beneficial partnerships with our suppliers, ensuring these relationships are built on trust, fairness, and shared values. We highly value our suppliers and strive to uphold ethical practices that prevent any human cost in our product's lifecycle.



Luli Farrell, Co-founder

# Company Overview

ABI Interiors is an Australian-designed kitchen and bathroom supplier specialising in high-quality fixtures for the modern home. Our product range encompasses tapware, tiles, flooring, vanities, sinks, baths, showers, and a wide range of other architectural fixtures, providing a comprehensive, one-stop solution for renovation and design needs.

Guided by our core values—Quality, Trust, Innovation, Passion, and Responsibility—we are committed to enriching lives by creating thoughtfully designed products that solve consumer problems and add value to their spaces. Our mission is to provide homeowners and tradespeople with premium products at accessible prices, ensuring timeless design and lasting enjoyment. This commitment is backed by our 25-year additional warranty, a testament to the confidence we have in the durability of our products.

At ABI Interiors, we take pride in maintaining excellence at every step, from inspiration to installation. Whether through customer service, product innovation, staff development, or ethical practices, we continually redefine the home design experience, driven by the support of our valued customers and staff.

ABI Interiors Group

**ABI International Holdings Pty Ltd**  
**(ABN 44 643 806 679)**  
**(ABI Interiors)**

Parent company

**ABI Interiors Pty Ltd**  
**(ABN 22 612 741 385)**

100% owned subsidiary in Australia

**ABI Interiors International Limited**  
**(Company number 12954559)**

100% owned subsidiary in the United Kingdom

**ABI Interiors Limited**  
**(NZBN 94 290 477 870 63)**

New Zealand business wholly owned separately by a Director of ABI International Holdings Pty Ltd

ABI Interiors employs 191 people globally. Our Australian headquarters is the hub for central management functions, including product design and development, research, technology, marketing, finance, and human resources. Our global workforce is composed of 56% full-time, 39% casual, and 5% part-time employees.

Australia – 174 team members

- HQ, Showroom and, Warehouse – Carrara, QLD
- Showroom – Hawthorn, VIC
- Showroom – Perth, WA

United Kingdom – 8 team members

- Showroom and Office – Chelsea Harbour, London
- Third-Party Operated Warehouse – Banbury, Oxfordshire

New Zealand – 9 team members

- Showroom and Office – Parnell, Auckland
- Warehouse – East Tamaki, Auckland

**Guangzhou Suze Enkai Co. Ltd**

Associated entity operating in Guangzhou, China

In Guangzhou, China, we operate an associated entity, Guangzhou Suze Enkai Co. Ltd. Guangzhou Suze Enkai Co. Ltd is part owned by the spouse of a Director of ABI International Holdings Pty Ltd. Guangzhou Suze Enkai Co. Ltd works closely with our suppliers throughout the production process and is responsible for placing purchase orders, sourcing materials, managing product final assembly and reworking, quality control, and overseeing warehousing and logistics.

China – 60 team members

- Office – Guangzhou
- Factory & Warehouse – Zhongshan

ABI Interiors and all controlled entities, including its associated entity Guangzhou Suze Enkai Co. Ltd, share the same core business operations, policies, and supply chain.

## Product Supply Chain

The ABI Interiors range encompasses over 2,000 products, the majority of which are designed in Australia and manufactured in China.

To meet Australian and New Zealand regulations, our products are Watermark certified, ensuring they meet rigorous quality management standards. Select products in our range are WRAS-certified to meet water fittings regulations in the UK market.

ABI Interiors' founders personally established our core supplier relationships, which have a history spanning more than 11 years. The relationships with our newer suppliers in our emerging product categories range from one to three years.

ABI Interiors takes an active role in manufacturing management, overseeing each step of the process, and conducting regular inspections of our suppliers' factories, including unannounced visits. The Guangzhou Suze Enkai Co. Ltd team in China is integral to these efforts, and we work together to foster transparent supplier relationships. The next tier in our supply chain adds complexity since the procurement of raw materials and other components is based on competitive pricing and availability. We do not have direct oversight of our supplier's procurement practices.

### Materials used in our product supply chain

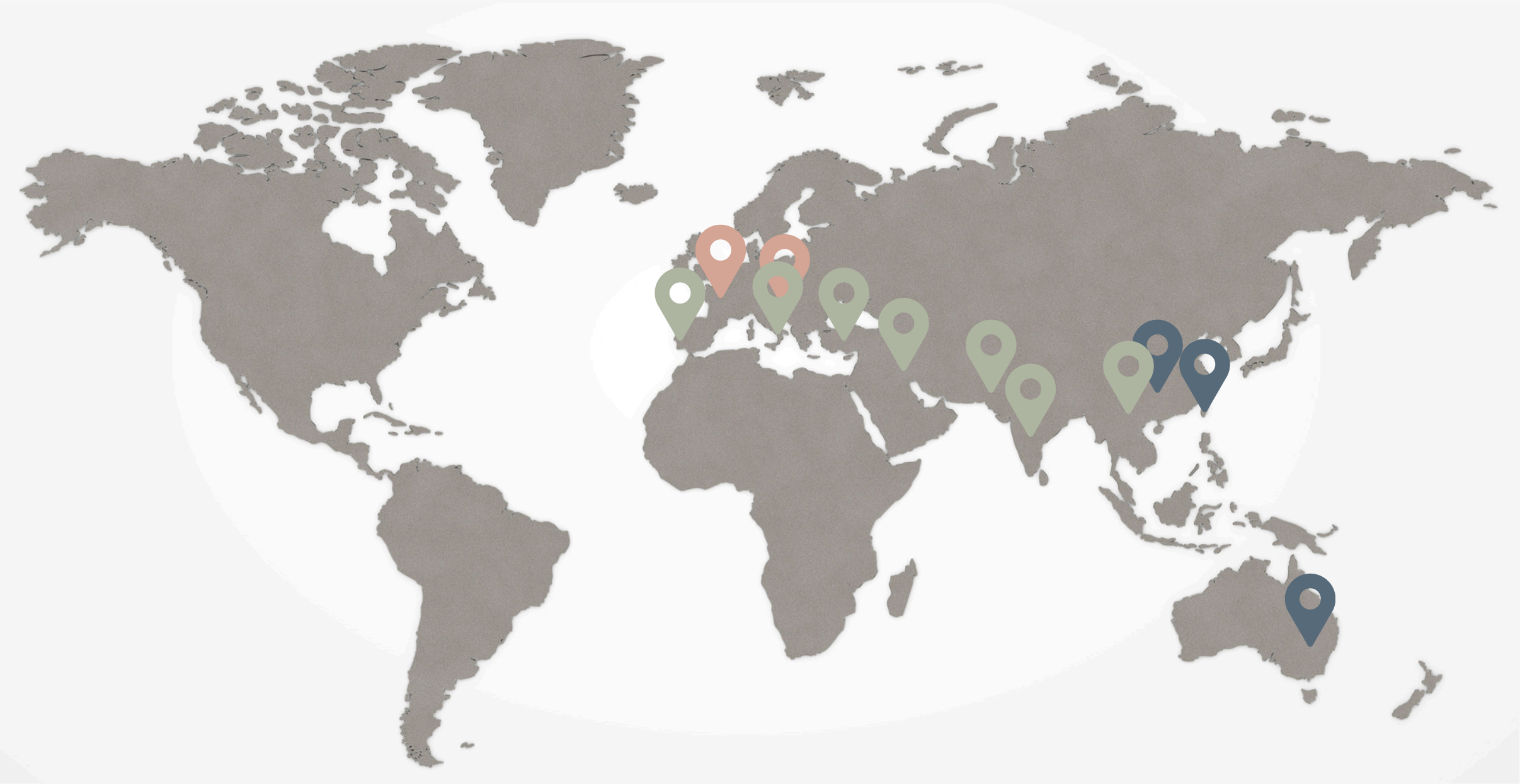
- |                      |  |
|----------------------|--|
| 1. Timber            | 8. Engineered Composite Material                   |
| 2. Plastic           | 9. Natural Stone                                   |
| 3. Cardboard         | 10. Ceramics                                       |
| 4. Stainless Steel   | 11. High-Density Moisture Resistant Particle Board |
| 5. Zinc Alloy        | 12. Timber Laminate                                |
| 6. Brass             |  |
| 7. Cement (Concrete) |  |

## Business Operation Supply Chain

We procure a range of goods and services to support our global operations:

1. Information technology – software development
2. Warehousing and freight services – local area delivery preferred delivery partnership, couriers, warehousing, and distribution
3. Facilities management services – cleaning, maintenance, fit-out, security
4. Professional services – insurance, external legal counsel, professional development facilitators, regulatory consultants
5. Mobility and travel – travel and accommodation bookings
6. Hospitality and events – event planning, catering, floristry, musicians
7. Professional trades – warranty and service

ABI Interiors Materials Source Map



**Tier 1 Suppliers**  
Australia  
China  
Taiwan

**Tier 2 Suppliers**  
Germany  
Hungary

**Tier 3 Suppliers**  
China  
India  
Iran  
Italy  
Pakistan  
Portugal  
Turkey

# Modern Slavery Risks

We acknowledge that our operations and supply chains may be at risk of exposure to modern slavery practices. In assessing these risks, we consider how our activities might cause, contribute to, or be directly linked to modern slavery across our business and supply chain.



**Geographic Risk**

Manufacturing and sourcing materials in China, as indicated by the Global Slavery Index 2023, exposes us to potential modern slavery risks. We recognise that in some instances, modern slavery could be caused by inadequate protections at a regional level, including poor enforcement of labour laws. Additionally, our association with suppliers in higher-risk regions may link us to forced or exploitative labour practices at certain tiers of production, particularly if oversight diminishes beyond our direct suppliers. To mitigate this, we have established strict due diligence practices, including regular, unannounced inspections and independent audits.

**Manufacturing Risk**

Our product manufacturing processes are complex, involving multiple materials and components that could expose us to risks. This complexity increases the possibility that we could contribute to modern slavery through indirect labour exploitation if pressure on suppliers results in unsafe labour conditions or excessive work hours. We maintain direct oversight of our Tier 1 suppliers, but we recognise that risks increase with Tier 2 and Tier 3 suppliers, where we may be linked to practices like forced labour or debt bondage in raw material extraction. Our sourcing team based in China set strict requirements for quality and certifications and, in some cases, specifies the suppliers for certain components. We also ensure that all timber used in our product range comes from FSC-certified sources. However, given the diverse range of components and materials involved in our products, our control and influence are reduced beyond our direct suppliers.

**Procurement Practices**

Competitive pricing and fast lead times are an inherent part of our business. We acknowledge the potential risks of contributing to modern slavery if our demands inadvertently place pressure on suppliers, leading them to cut costs at the expense of worker rights. To address this, we continually review our procurement practices to avoid pressuring suppliers in ways that could negatively impact their workers. We proactively place purchase orders, often doubling the delivery time estimated by our suppliers to alleviate pressure while still maintaining our customer's expectations. Our commitment is to pay for quality, ensuring that our business practices do not inadvertently contribute to labour exploitation. We ensure timely payments and never demand unreasonable discounts, focusing instead on ordering in larger volumes to support our suppliers.

**Contracting Base-Skill Activities**

Contracted services for cleaning, security, and maintenance represent high-risk areas for modern slavery. We could be linked to exploitative labour practices if contractors employ workers under conditions that include excessive working hours, lack of formal contracts, recruitment fees, or restrictions on freedoms. While we do not directly control these workers, our role in contracting these services may contribute to unethical labour practices if we fail to ensure that contractors comply with ethical employment practices. To address this, we are engaging in regular conversations with stakeholders to understand potential red flags, and we will be making our Whistleblower Policy accessible to all contracted workers, in addition to our internal teams who already have access to this. This policy provides a safe channel for reporting any unethical practices, labour violations, or signs of modern slavery within our operations or those of our contractors.

# Action Plan to Address Modern Slavery Risks

In line with the UN Guiding Principles on Business and Human Rights, we are committed to protecting and respecting human rights and providing remedies to victims of slavery. Our approach includes a strong policy commitment to uphold human rights, a comprehensive due diligence process to identify, prevent, and mitigate potential risks, and a clear framework for accountability. Should we cause or contribute to any adverse human rights impacts, we are dedicated to remediating these issues promptly. This involves working closely with our suppliers to address concerns, implementing corrective actions, and supporting affected individuals.

1.

**Assigning Roles and Responsibilities**

A designated modern slavery working group has been formed with a lead appointed to implement the strategy, to address modern slavery risks, and monitor the progress of our actions. We acknowledge that this is, and will be, an ongoing commitment of our business. Meetings with the working group will be held every quarter.

2.

**Policy Improvements**

Supplier Code of Conduct:  
We are working on a Supplier Code of Conduct that has clear guidelines and expectations for our suppliers to adhere to ethical labour practices and uphold human rights. This will need to be acknowledged by all existing and new suppliers we work with.

Human Rights Policy:  
We are creating a Human Rights Policy to demonstrate our commitment to respecting and promoting human rights within our operations and supply chain.

Revising Existing Workplace Behaviour Policy:  
We are making updates to our existing Workplace Behaviour Policy, which includes renaming it to an Employee Code of Conduct, with enhancements to the behavioural expectations for all employees to ensure a culture of integrity and respect.

These policies will be mandatory for all ABI Interiors and Guangzhou Suze Enkai Co. Ltd team members to acknowledge and will be reviewed every 12 months.

3.

**Modern Slavery Training**

We are implementing company-wide training on modern slavery to ensure that all employees are well-informed and empowered to recognise and address any potential issues related to modern slavery. By fostering a culture of awareness and responsibility, we aim to equip our team with the knowledge and tools needed to actively contribute to the prevention of modern slavery within our operations. Through educating our team, we are better placed to identify modern slavery red flags and conduct due diligence when entering arrangements with contractors. We plan to run specialised training sessions annually to drive awareness and cultural change.

We have partnered with The Freedom Hub, an Australian charity dedicated to ending slavery and supporting survivors, to lead a company-wide modern slavery training session in December 2024.

4.

**Revised Supplier Audits**

Since establishing our supply chain in China in 2013, our team has conducted regular audits with suppliers, including physical inspections and unplanned visits to assess safety standards and working conditions. We take pride in partnering with suppliers who share and consistently meet our high standards. However, we recognise that our business has grown significantly since 2013, increasing the number of suppliers and products involved in our supply chain. In early 2024, we developed an improved supplier audit process that was more specifically designed to monitor modern slavery risks. These enhanced audits commenced in July 2024 and will be a critical component of our oversight mechanism. We are actively working with suppliers to encourage open communication on modern slavery risks, communicate our expectations, and encourage cooperation.

**The revised supplier audit contains the request for information on the following**

Factory details: Information about the physical facilities, locations, and production capabilities and working conditions.

Modern Slavery Policy: Information on any policies related to modern slavery and any efforts to combat the risk of slavery in the workplace

Recruitment practices: Transparency about any subcontracted work, use of recruiters or labour hire

Ethical compliance: Information about the supplier’s efforts to ensure ethical compliance, including fair labour practices and grievance mechanisms

Progress on action plan to address modern slavery risks	Timeframe	
Conducting regular in-person inspections at our supplier’s factories at least quarterly, if not more frequently	On-going	
Developed an improved supplier audit to monitor modern slavery risks, due to commence audits in July 2024	On-going	10 suppliers will complete the new audit each quarter
Whistleblower Policy enforced and signed by all employees	Complete	
Make Whistleblower Policy available to all contractors	Underway	Due for completion end of 2024
Revised Workplace Behaviour Policy/Code of Conduct	Underway	Due for completion end of 2024
Create a Supplier Code of Conduct and ask all Tier 1 suppliers to acknowledge	Underway	All suppliers to acknowledge by Q1 2025
Human Rights Policy	Underway	Due for completion end of 2024
Company-wide training on modern slavery	On-going	First session December 2024

# Assessing our Actions —————>

To assess the effectiveness of our actions in combating modern slavery, our dedicated modern slavery working group will be responsible for overseeing and evaluating our initiatives. This group will engage in consultations with external organisations to gain insights into our modern slavery risks and regularly review the results of the supplier audits, and any whistleblower reports. Additionally, we will review our procurement KPIs to ensure they align with our ethical standards and objectives. The effectiveness of our training sessions will be evaluated based on the level of awareness and understanding demonstrated by our employees, particularly those in leadership, finance, and procurement roles.

The table below identifies benchmarks within our supply chain, which will form the basis of improvement comparison in future statements.

Identified Supply Chain Risk	2024 Risk
<div>Product supply chain<ul style="list-style-type: none"><li>• Geographic risk</li><li>• Manufacturing risk</li><li>• Procurement practices</li></ul></div>	<div><ul style="list-style-type: none"><li>• <b>Moderate</b></li><li>• <b>High</b></li><li>• <b>Low</b></li></ul></div>
<div>Business operations supply chain<ul style="list-style-type: none"><li>• Contracting base skill activities</li></ul></div>	<div><ul style="list-style-type: none"><li>• <b>High</b></li></ul></div>

# Joint Statement

All ABI Interiors Group entities and associated entity Guangzhou Suze Enkai Co. Ltd were consulted during the preparation of this statement. We have prepared a joint statement for ABI Interiors Pty Ltd and ABI Interiors International Limited as we share the same policies, processes, and supply chain. Continued dialogue between our entities ensures alignment and strengthens our collective commitment to eradicating modern slavery.

# Future Steps

While ABI Interiors has been undertaking measures to limit modern slavery risks since the inception of the business, this is our inaugural global Modern Slavery Statement. As a product business with a global supply chain that uses a wide variety of raw materials, we recognise the inherent modern slavery risks posed by our business model. We have developed a blueprint to guide our risk-reducing activities over the next five years.

Blueprint Plan	Supply Chain Level	Risk Influence Matrix
Stage 1	Tier 1 Direct product suppliers	Full compliance
Stage 2	Tier 2 Suppliers to tier 1	Influencing decisions and improving compliance
Stage 3	Tier 3 Raw materials	Gaining transparency