

Modern Slavery Statement 2021

Tom Stoddart Pty Ltd

Introduction

Tom Stoddart Pty Ltd ABN 16 009 690 251 (Stoddart) is a family owned Australian business focused on the manufacture and distribution of a diverse range of quality products to the building and foodservice industries. We employ over 500 employees across Australia with the majority at our head office and manufacturing facility in Brisbane, but have distribution facilities in each state.

Our Vision

We aim to be a world class manufacturer and distributor, focused on excellence across all aspects of our business with a commitment to caring about our customers, our employees, our suppliers, and the products and services we sell.

Our approach to Modern Slavery

Our focus on excellence and integrity is central to our business, and can't be achieved without an effective supply chain. Stoddart has a zero- tolerance approach to modern slavery, both in our operations and those of our supply chain. We aim to distribute quality products, that have been produced ethically, and exploitation of people in this process has no place. This is our first report, and with Covid interruptions to our business, we are still working through our supply chain to understand the risks beyond our own business. Our report indicates what we have done to date and our plans to progress this in the future.

Business Structure, operations, and Supply Chain

Tom Stoddart P/L is a diverse business with 8 operating divisions, most involved in manufacture, supply and installation of metal products to the Australian building industry. One division manufactures, imports and distributes a range of commercial cooking equipment for the foodservice industry, and another provides warranty and service backup across the country for customers in the foodservice industry. Our manufacture is all done in Brisbane, but our supply chain extends across Australia and overseas for some foodservice products, and also for components used in our manufacture.

Metal sheet, coil and tube, are the primary materials used in our manufacture. The great majority is sourced from large Australian manufacturers, or from large national importer/distributors who already report under the Modern Slavery legislation. Components used in manufacture of metal products are sourced mainly from Australian suppliers, with some directly from overseas suppliers. Foodservice equipment is imported from major equipment manufacturers in Italy, USA, UK & China, with an emphasis on reputable suppliers who produce a quality product or component.

Company approach to quality, safety, environment, and people

We have achieved accreditation to International standards ISO 9001, 45001 and 14001 relating to quality, safety, and environmental issues, and employ procedures to evaluate our supply chain to comply with the requirements of these standards. Our business has a Supplier Code of Conduct and we question our suppliers to monitor compliance to it.

We have recently added additional questions along the lines of those detailed in the Border Force “Modern Slavery and Trafficking Supplier Questionnaire” to better understand the likelihood of modern slavery issues within our supply chain, and are working through this with all suppliers, prioritising, where we perceive the higher risk.

Supply Chain Mapping and Risk Analysis

Our major suppliers are based in Australia, but we do import equipment from reputable manufacturers in USA, Italy, UK, and China, with components also sourced from Malaysia for one product group. We have used the ABF material available to analyse the risk with the types of products and the sources where we obtain them from. The type of products that we import are not recognised as an industry or sector with a history of high risk of involvement in modern slavery, but we do carry out checks on our suppliers as we evaluate their ability to supply quality products, reliably, and ethically. We have carried out mapping on our supply chain for each of our operating divisions, looking at, sector and industry risks, product and service risks, geographic risks, and supply chain model risks. From this evaluation, we have focused our initial efforts on the areas of our supply chain where we perceive the risk to be higher, and will expand this review across our entire supply chain, working initially with tier1 suppliers, then progressively working down our supply chain.

Staff Training

Our staff are our eyes and ears to be able to detect issues within our supply chain, and having them understand the modern slavery problem, and the risk, is a key step in implementing our plans. We are developing a training program for our procurement team in conjunction with industry body Australian Industry group, to assist staff to be aware of what constitutes modern slavery, and how to detect it in our supply chain. The program will involve an instruction phase, then a self test questionnaire, with the results recorded to monitor uptake by relevant staff.

Remediation

In carrying out checks with our suppliers, our policy is to work with suppliers, jointly looking at areas where we consider there to be a problem or possibility of abuse or mistreatment of workers. If a problem is detected or suspected, we agree on action to be taken by the supplier and set a timeframe for the remediation to take place. Failure to carry out the remedial action within specified timeframes will result in termination of the supplier relationship. Once an issue has been detected and remedied, the supplier will be subject to ongoing tests for a period to minimise the likelihood of a recurrence.

Review and Oversight

Stoddart recognises that combatting modern slavery, requires an ongoing commitment from our staff at all levels. Our senior management team are leading the process, with our Supply Chain and Procurement manager overseeing the day to day implementation with our procurement team. The senior management team receives a monthly report from the Supply Chain manager on his teams progress reviewing our supply chain performance, with a specific focus on any issues arising that suggest the possibility of a risk of slavery or abuse of people. An annual external audit is carried out on our business processes to ensure that we comply with our international standards for quality, safety and environment, and we are adding a separate internal audit on our response to modern slavery in our Australian business, and that of our supply chain.

Consultation with entities that Stoddart owns or controls

We have small operations in New Zealand and Indonesia, and our managers in these locations are required to enforce the same controls over our own operations and those of our suppliers in these locations. We meet monthly with the senior management of these teams and the Modern Slavery reporting will be included formally on the agenda quarterly going forward.

Ongoing Commitment

Stoddart has an ongoing commitment to ethical behaviour in our business and that of our supply chain partners, and we will comply with the requirements of the Modern Slavery Act 2018 to produce an annual statement, reporting on risks within our operations, and supply chains, and the actions we have taken to mitigate these risks. International travel has been limited in the year to June 2021, but we hope to expand our direct contact with our supply chain as the world economy reopens, to strengthen our interaction with our supply chain in the year ahead. Below is a brief summary of our actions planned as we work towards a sustainable and fair supply chain.

Actions to be undertaken before the next Annual Statement

1. Regularly brief senior management team on the risks of Modern Slavery in our supply chain and their responsibilities
2. Implement a staff training program across our procurement team
3. Extend our supply chain mapping identifying suppliers by products, locations, and volumes purchased, where we perceive a risk of slavery or people mistreatment
4. Develop a register of risks identified and the actions taken
5. Implement an audit of our effectiveness in complying with our Modern Slavery responsibilities

Principal Governing Body Approval

This modern slavery statement was approved by the board

of directors as the principal governing body of Tom

Stoddart Pty Ltd on 17 June 2022

Signature



Anthony Stoddart

Director/ Company Secretary



Jeff Mundy

Director

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE 1

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	1
b) Describe the reporting entity's structure, operations and supply chains.	1
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	2, 3
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	3
e) Describe how the reporting entity assesses the effectiveness of these actions.	3
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	3
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	4

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include

the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

- Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
- Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.