



## **Quad Lock Group**

# **MODERN SLAVERY STATEMENT**

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Made pursuant to the Australian Modern Slavery Act 2018

### **REPORTING ENTITY**

This modern slavery statement is made in compliance with the Modern Slavery Act 2018 (Cth) (the Act) on behalf of the Quad Lock Group.

The Quad Lock Group reporting entities are referred to collectively in this statement as "Quad Lock" (we/us/our).

The registered office and principal place of the Quad Lock businesses is Suite 6A, Level 3 The Como Centre, South Yarra VIC 3141 Australia.

### **OUR STRUCTURE AND OPERATIONS**

Quad Lock specializes in the design, development, manufacture, and supply of smartphone cases and mounting systems to individual consumers and commercial customers under the Quad Lock brand. Our products are sold online (direct-to-consumer) via our owned websites, on third party marketplaces such as Amazon and eBay and to commercial customers comprising wholesale distributors and specialty retailers.

Our team of 60 people work from our head office facility in South Yarra VIC. We also have a Representative Office in China where our team of five people are primarily engaged in quality assurance activities relating to the contract manufacturing of our products.

Quad Lock products are contract manufactured in China and exported through our distribution network which is managed by a third-party freight forwarder. A third-party logistics provider manages the fulfilment and delivery of customer orders via a global network of parcel carriers.

### **GOVERNANCE AND POLICY FRAMEWORK**

Quad Lock is committed to compliance with all applicable laws and standards where we directly operate. We also expect our suppliers to do the same in the regions they operate in. We fully acknowledge that risks of modern slavery exist in any complex supply chain, particularly where raw materials are procured by our suppliers from one or more other companies that we have no direct interaction with or knowledge of.

### **OUR SUPPLY CHAIN**

Quad Lock engages contract manufacturing partners to produce the majority of the Quad Lock products in China using a wide range of raw materials and components which are supplied by both Chinese and overseas based suppliers and manufacturers.



We have identified approximately ten direct suppliers to our business. Of these suppliers we have applied a risk-based approach to identify higher risk suppliers for the purposes of modern slavery compliance and will commence a systematic program of Azolla certified ethical audits to be conducted annually commencing in FY2023.

## **DESCRIPTION OF MODERN SLAVERY RISK IN OUR SUPPLY CHAIN**

The majority of our suppliers are based overseas. Due to the nature of the products we source from those overseas suppliers many procure the raw materials required for production from overseas and then supply finished, assembled products to Quad Lock.

We acknowledge that the risks of modern slavery may be heightened in our supply chain and operations as a result of the geographical location of some suppliers, our areas of operation, and the source of materials used in products supplied to us. We also acknowledge that we lack visibility in certain overseas markets and this carries additional risks of modern slavery especially in secondary levels of our chain of suppliers and source materials used in our group's goods and services.

The assessment of modern slavery risks is undertaken by the Quad Lock Operations team. In order to undertake an assessment of the modern slavery risks to the business we have undertaken a risk-based analysis of our expenditure. This analysis includes an assessment of the type of product or services supplied to us; the geography of supply; and any specific known supplier issues.

## **ACTIONS TAKEN AND ASSESSMENT OF EFFECTIVENESS**

We have assessed the risks of modern slavery impacting our business and have integrated this into our supplier approval and risk management process. This integration is an on-going activity across our business and will extend to inclusion in our policy and procedural documentation and practices.

We recognize that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon.

## **CONTINUOUS IMPROVEMENT**

We have commenced and will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

We are committed to continuous improvement of our systems and processes in order to reduce the risks of modern slavery in our supply chain into the future. This will include;

- Continued training of our staff;
- Progressively rolling out new supply agreements that reference our Supplier Manual;
- Reviewing closely any suppliers deemed to have elevated risk; and
- Azolla certified ethical audits with our first audits conducted in November 2022



## CONSULTATION

All of the entities listed in this statement have common directors and officers and are aligned across the Quad Lock Group.

## APPROVAL

This statement was approved by the Board of Key Topco Pty Ltd on 22 December 2022 and is signed by Christopher Peters in his capacity as a Director. This modern slavery statement has been adopted across the Quad Lock Group.

**Chris Peters**  
Director

A handwritten signature in blue ink, consisting of a large, stylized loop followed by a horizontal line.

## DEFINED TERMS:

**Quad Lock Group** is comprised of the following entities;  
**Annex Products Pty Ltd** ABN 89 154 777 401, **Quad Lock Pty Ltd** ACN 602 131 171, **Key Bidco Pty Ltd** ABN 77 642 829 589, **Key Midco Pty Ltd** ABN 56 642 829 436, **Key Holdco Pty Ltd** ABN 28 642 828 948 and **Key Topco Pty Ltd** ABN 44 642 828 199.