

Modern Slavery Statement 2021

1. Introduction

This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (Cth) and covers the activities of Coventry Group Ltd ABN 37 008 670 102 and its related entities (Coventry). This statement sets out actions taken by Coventry to address modern slavery and human trafficking risks in its business and supply chain for the financial year ended 30 June 2021.

This is Coventry's second statement and describes our actions over the past year to assess and address relevant risks.

2. Structure, Operations and Supply Chains

Coventry has two operating segments:

- a) Trade Distribution comprises Konnect and Artia Australia, Konnect and Artia New Zealand, and Nubco. These businesses supply a range of fastening systems, cabinet hardware systems, industrial and construction products through a network of 49 branches in Australia and 18 branches in New Zealand. Customers are in the industrial, manufacturing, construction, infrastructure, agriculture and mining sectors.
- b) Fluid Systems comprises Cooper Fluid Systems, Torque Industries, H.I.S. Hose and Fluid Power Services. These businesses design, manufacture and sell hydraulic, lubrication, fire suppression and refuelling systems and products through 15 branches in Australia. Customers are in the mining, manufacturing, defence, recycling and agriculture sectors.

The supply chains for these businesses include trading stock and manufacturing inputs that are sourced widely within Australia and New Zealand (c. 76%) and overseas (c. 24%) from countries including China, United States and Taiwan. Staff are employed across all states and territories of Australia and in New Zealand and services are procured for a variety of operational needs including, but not limited to, information technology, marketing, freight, travel, rent and building maintenance.

3. Identifying and addressing risk – Employees

Coventry takes its employment compliance obligations seriously. Coventry has robust policies and processes in place to ensure compliance with all legislation and industrial instruments. Our staff in Australia are covered by a combination of Federal Awards, the National Employment Standards and the Fair Work Act. Our staff in New Zealand are covered by New Zealand Employment Legislation.

Coventry conducts periodic audits to ensure compliance with all applicable industrial instruments and has a comprehensive suite of company policies which are regularly reviewed and updated. All staff receive training on applicable policies.

4. Identifying and addressing risk – Supply Chain

Following an initial review of its supply chain, Coventry has identified the potential for modern slavery in certain higher risk geographies. This includes a small number of direct overseas supplies and second and third tier suppliers based overseas. The potential for risk has also been identified in certain industries from which we procure services such as transport.

While Coventry has not identified any incidents or material risks of modern slavery in its supply chain, it takes its responsibilities and obligations seriously. Coventry will continue to refine and strengthen its supply chain policies and processes, refine and improve staff risk management training and continue to conduct its annual Supplier Assurance of Ethical Sourcing of Labour audit of suppliers depending on risk profile.

5. Assessing effectiveness of actions

The oversight of Modern Slavery risk assessment, management and control at Coventry has been delegated by the Board to the Coventry Leadership Team. This team reports to the Board on a regular basis through the Managing Director.

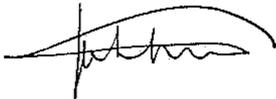
Coventry has a supplier audit system in place to oversee its international suppliers (predominantly in North America and Asia) which includes strong relationship management, annual site visits (completed virtually during 2020-2021 COVID lockdowns) and training.

In FY21, Coventry conducted ethical sourcing audits of their top 10 suppliers from each of its businesses for its local suppliers, which equates to 67% of its total spend of locally based companies. Coventry is aware that some of these companies source their products from international suppliers and mitigates these risks through an understanding of each supplier's visibility of their own supply chain, whether it be high, moderate or developing.

6. Approval

This Modern Slavery Statement was approved by the Board of Coventry Group Ltd on 13 May 2022.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Robert Bulluss', with a large, sweeping flourish above the name.

Robert Bulluss
CEO and Managing Director