



# Bradnam's Windows and Doors Pty Ltd

## Modern Slavery Statement

6<sup>st</sup> November 2023

Made pursuant to the Australian Modern Slavery Act 2018

### 1. Reporting Entity

This statement relates to

Bradnam's Windows and Doors Pty Ltd ABN 78 010 409 819

and its controlled subsidiaries

National Glass Pty Ltd ABN 34 010 908 102,

Bradnam's Windows and Doors Newcastle Pty Ltd ABN 71 159 727 241,

National Aluminium Pty Ltd ABN 48 667 022 853,

QLDPLAS Pty Ltd ABN 78 661 964 165.

Bradnam's Windows and Doors is a privately owned Australian company.

This statement covers the financial year ending 30<sup>th</sup> June 2023

### 2. Structure, Operations & Supply Chains

Bradnam's is a leading Australian manufacturer of aluminium windows and doors, predominantly to service the residential building and construction industry in Australia. We have manufacturing and showroom sites located along the east coast of Australia and employ approximately 1,300 people.

In this reporting period the company also acquired two new manufacturing businesses. One which manufactures plastic injection moulded parts, and one which manufactures aluminium extrusions along with powder coating and anodising finishing. This adds approximately a further 240 people employed.

We procure raw materials such as aluminium log, aluminium extrusion, timber, plastic raw materials, plastic components, glass, locks and associated hardware from Australia and many other countries worldwide. These other countries include Belgium, China, Chile, Indonesia, New Zealand, Singapore, Thailand, and UAE.

We reject modern slavery in all its forms and always try to source from reputable suppliers via long term close working relationships.

### 3. Identification of Modern Slavery Risk

Bradnam's Windows & Doors is committed to the elimination of modern slavery through its business, suppliers and the production of materials used.

The risk of modern slavery exists both within the labour directly used by our suppliers but also that used in the production of raw materials used in their processes.

We fully acknowledge that risks of modern slavery can 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.

Component products, even when purchased in Australia can have manufacturing and raw materials sourced from all over the world, and it is often difficult to determine how they are produced with many steps up the supply chain where we have little visibility. It is recognised that modern slavery can occur at any step in this process.

Bradnam's seeks to work with suppliers and business partners that share our commitment to integrity, sustainability and elimination of modern slavery as outlined in our Sustainable Procurement Policy. This policy is available on our website at <https://www.bradnams.com.au/sustainable-procurement>

## 4. Risk Assessment, Governance and Policy Framework

We are 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. The Bradnam's Sustainable Procurement Policy underpins the governance framework used to manage the risk.

Most of the work done during this reporting period has been to bring the two newly acquired businesses in line with the Bradnam's operating policies. This has required contacting all existing suppliers, asking them to agree to the Bradnam's Sustainable Procurement Policy. Staff also needed training on the Australian Modern Slavery Act and their requirements to act under the Bradnam's policy framework.

All new and existing suppliers are required to agree to the Bradnam's Sustainable Procurement Policy.

- This policy outlines our commitment to ethical and sustainable procurement and details the expectations that our suppliers are required to agree with and abide by. These expectations include statements on human rights, modern slavery, and compliance with the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. These expectations are also required to be flowed onto their own supply chains.
- Our new suppliers process has been updated to require a signed policy document is submitted before a supplier can be set up in our systems.
- Through the course of this year, we have continued the work to ensure that all suppliers set up in past years have acknowledged and signed our Procurement Policy.

### Assessment Surveys

- Suppliers are also required to periodically complete a survey to better measure their understanding of the Modern Slavery Act, their responsibilities, and any risks they might be aware of in their supply chains.

### Training of procurement staff

- Staff responsible for procurement decisions receive training on the Modern Slavery Act 2018. The training covers their responsibility to identify and report any risks they become aware of as part of their interactions with our suppliers.
- This year training on the Modern Slavery Act was conducted with all our site managers as part of a management meeting.

### Supplier visits

- Where possible suppliers manufacturing facilities are visited prior to engagement.
- Our policy requires suppliers to provide Bradnam's Group or nominated third party with reasonable access to operating facilities, employees, and records to enable audit of compliance as required.

We are not currently aware of any modern slavery practices occurring within our supply chain.

## 5. Ongoing Assessment

We assess the effectiveness of our policy framework by.

- Documenting and investigating any reports of non-compliant behaviour received from employees or any other source, relating to the operations of our business, contractors, and suppliers.
- Regularly surveying our suppliers about their understanding of modern slavery and any concerns they might have with their business.

- Identifying suppliers that produce in higher risk regions, or use raw materials considered at higher risk. If a supplier is found to be non-compliant with our policies and does not rectify this in an open and timely manner, then supply from that company will be terminated.

## 6. Consultation with Controlled Entities

Entities controlled by Bradnams Windows & Doors all have shared directors and report through to the Bradnams Windows & Doors CEO. Controlled entities all use the same assessment framework and through regular meetings with senior managers all are made aware of the Modern Slavery Act and their responsibilities relating to it.

When new controlled entities are acquired, then the same Modern Slavery Act policy framework is introduced into those companies.

## 7. Continuous Improvement

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

- Continued ongoing training of our staff.
- Continue to implement our Sustainable Procurement Policy to existing suppliers.
- Establish a risk assessment of our supplier base. This is guided by our knowledge of the supplier and their industry as well as responses to our survey.
- Develop a risk matrix to assign a risk score which will assist in identifying higher risk supply chains. This year we have developed a list of higher risk suppliers based on where they are located, where they source product, and the types of products they supply us.

During this reporting period we have concentrated on introducing the policy framework into the two newly acquired companies, which previously had no Modern Slavery Act policies in place. As part of this process all current suppliers have been contacted and asked to commit to our Sustainable Procurement Policy and provide their Modern Slavery policies if they have them.

This statement has been approved by the board of management of Bradnams Windows and Doors Pty. Ltd.



Janice Bradnam  
Director