

Modern Slavery Statement 2023

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). We consulted the relevant companies we own in the development of this statement which sets out actions taken by Coventry to address modern slavery and human trafficking risks in its business and supply chain for the calendar year ended 31 December 2023.

This is Coventry's fourth statement and describes our recent actions to assess and address relevant risks.

1. Introduction

Coventry is committed to respecting human rights and implementing policies, procedures, and internal checks to eradicate any form of Modern Slavery from its operations and supply chain. Coventry employees are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.

2. Structure, Operations and Supply Chains

Coventry has two operating segments:

- a) Trade Distribution comprises Konnect and Artia Australia, Konnect and Artia New Zealand, GHL (NZ), NZ Plank Hire, and Nubco Pty Ltd (ABN 14009543248). These businesses supply a range of fastening systems, cabinet hardware systems, fencing, scaffolding, and industrial and construction products through a network of 50 branches in Australia and 20 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 16 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. 84%) and overseas (c. 16%) 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 is committed to a high level of compliance with Modern Slavery legislation, including the Modern Slavery Act 2018 (Cth). Along with this Modern Slavery Statement, Coventry has a comprehensive suite of company policies including an established Ethical Sourcing and Modern Slavery Policy, a Company Code of Conduct, a Whistleblowing Policy, and an Anti-Bribery and Corruption Policy.

The Company Code of Conduct outlines Coventry's vision and values, and encourages all Coventry employees to report any breaches of the code to senior management or the Human Resources team.

The Coventry Company Code of Conduct is regularly reviewed and updated, is part of the induction process for all new employees, and is available on both the internal intranet and CGL website.

4. Identifying and addressing risk – Supply Chain

Coventry acknowledges that there is the potential for modern slavery in certain higher risk geographies within its supply chain. This includes a small number of direct overseas suppliers 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.

Coventry's Ethical Sourcing and Modern Slavery Policy and its associated procedure and supplier questionnaire sets out Coventry's requirements and expectations to its suppliers, wholesalers, and agents, whether national or international, to comply with relevant laws, regulations, treaties, covenants, or other agreements, such as International Labour Organisation (ILO) standards.

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.

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, site visits and training. This year, it conducted ethical sourcing audits of 40% of its total spend of overseas suppliers, and visited all of its large USA and China based suppliers, plus numerous potential suppliers to perform site checks and risk assessments.

During 2023, Coventry conducted ethical sourcing audits of their top 25 suppliers from each of its businesses for its local suppliers, which equated to 77% of its total spend of locally based suppliers.

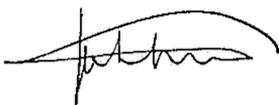
Coventry is aware that some of its local suppliers source their products from international suppliers and mitigates these risks through an understanding of each supplier's visibility of their own supply chain, whether it be high, moderate or developing.

Additional due diligence performed included providing fact sheets to smaller suppliers on Modern Slavery in Australia, New Zealand, and globally, as well as suggested tasks, additional information, and resources.

6. Approval

This Modern Slavery Statement was approved by the Board of Coventry Group Ltd on 15 December, 2023.

Yours faithfully



Robert Bulluss
CEO and Managing Director
Coventry Group Ltd