

New South Wales (Head Office)
1/13 Cooper St. Smithfield NSW 2164
P.O. Box 2084, Smithfield NSW 2164
P: (02) 8786 5200
F: (02) 8786 5288

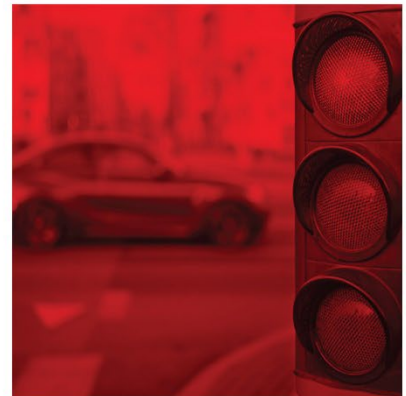
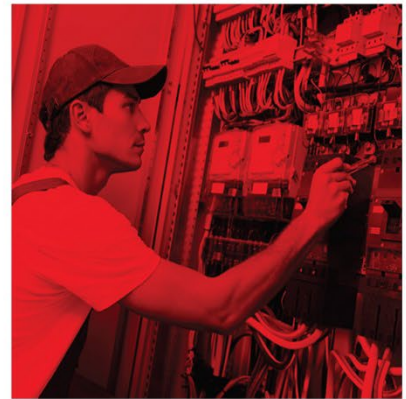
Victoria
460-464 Hammond Rd.
Dandenong South, VIC 3175
P: (03) 9706 6819
F: (03) 9768 3580

Queensland
118 Sandstone Pl.
Parkinson, QLD 4115
P: (07) 3386 9800
F: (07) 3809 0411

Western Australia
24 Harrison Rd.
Forrestfield, WA 6058
P: (08) 9454 2628
F: (08) 9454 3026

Electra Cables (Aust.) Pty Ltd

Modern Slavery Statement



Reporting period

1 January 2023 – 31 December 2023

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**The
CABLE
you NEED,
WHEN
you NEED it,
WHERE
you NEED it.**

- **Massive Range:**
One of the widest ranges of products available.
- **Great Stock Holdings:**
Possibly Australia's largest stock holdings.
- **Unrivalled Service:**
Great turnover time guaranteed, including cuts.
- **Quality Certified:**
Over 30 new Certificates of Conformity awarded for various lines since January 2018 alone.



**ELECTRA
CABLES**

(Aust.) Pty Limited

SYDNEY | MELBOURNE | BRISBANE | PERTH

• FLAT
• XLPE/PVC
• CIRCULAR
• CONTROL
• FLEXES
• MAINS
• DATA & SECURITY
• SPECIALTY CABLES

Foreword

Electra Cables (Aust.) Pty Ltd has been supplying quality electrical and electronic cables to Australian industries and communities for power, lighting, and communication for over 40 years. Electra's cable products have been used in many prestigious buildings and projects throughout Australia and elsewhere around the world.

Electra Cables is committed to operating our business lawfully, ethically, and to working with suppliers that are aligned to our values.

Electra Cables believes that everyone, everywhere has the right to a life free from slavery. We seek to foster a transparent and responsible business environment, where human rights are respected, and workers are treated with dignity and fairness. Our commitment to respect and support human rights is aligned to the UN Guiding Principles on Business and Human Rights. Electra Cables seeks to work alongside like-minded organisations to secure freedom for people in, or vulnerable to, modern slavery.

Electra Cables is pleased to submit its annual Modern Slavery Statement for the reporting year 2023.

Principal Governing Body Approval

This statement was approved by the Board of Electra Cables (Aust.) Pty Ltd in their capacity as principal governing body¹ of Electra Cables (Aust.) Pty Ltd on 7 February 2024.

Signature of Responsible Board Member

This Modern Slavery Statement is signed by Luke Zhou in their role as a responsible member² of the reporting entity's principal governing body.



Luke Zhou
Deputy Managing Director

12 June 2024

¹ Section 4 of the *Modern Slavery Act 2018* (Cth) ("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.

² 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.

1 Reporting entity

- 1.1 The reporting entity covered by this statement is Electra Cables (Aust.) Pty Ltd, Australia (“Electra”, “Electra Cables”), an Australian incorporated entity, with ABN 38 056 024 385, trading as Electra Cables since 12 June 1992.
- 1.2 Electra Cables is a reporting entity under the *Modern Slavery Act 2018* (Cth).
- 1.3 This statement is submitted for the reporting year 1 January 2023 – 31 December 2023.
- 1.4 Electra Cables makes this statement as a single reporting entity in accordance with section 13 of the *Modern Slavery Act 2018* (Cth).

2 Structure, operations and supply chain

2.1 Structure

- 2.1.1 The Australian Government guidance for reporting entities on preparing a modern slavery statement under the *Modern Slavery Act 2018* (Cth) describes the “structure” of the entity as “the legal and organisational form of the entity, including its legal classification (company, trust, partnership etc), number of employees, whether it is part of a larger corporate group of entities, and whether it owns or controls other entities”.³
- 2.1.2 Electra Cables is legally classified as an Australian proprietary limited company, incorporated under the *Corporations Act 2001* and registered with ASIC.
- 2.1.3 As of 31 December 2023, Electra directly employed 88 employees.
- 2.1.4 Electra Cables is part of a larger corporate group that includes Elite Cables (Aust) Pty Ltd (“Elite Cables”), Guilin Xin Ao Wire and Cable Co Ltd (“Xin Ao”), and Guilin International Wire & Cable Group Co., Ltd (“Guilin International”).
- 2.1.5 Guilin International and Electra are shareholders in three other cable manufacturing companies.
- 2.1.6 Guilin International, and the other cable manufacturing companies, are Electra’s suppliers.
- 2.1.7 Electra Cables does not own or control any other entities.

³ Commonwealth Modern Slavery Act 2018: Guidance for reporting entities, available at: <https://modernslaveryregister.gov.au/resources/> .

2.2 Operations

- 2.2.1 The Australian Government guidance for reporting entities on preparing a modern slavery statement under the *Modern Slavery Act 2018* (Cth) describes the “operations” of the entity as “activity undertaken by the entity to pursue its business objectives and strategy in Australia or overseas”.⁴
- 2.2.2 Electra Cables is an importer and distributor of a large range of electrical and electronic cables, including customised and commodity cables to local users in Australia. Users are mainly wholesalers and distributors of electrical cables.
- 2.2.3 Electra Cables directly employs management, procurement, sales, warehouse, finance, logistics and administration staff that support day-to-day operations.
- 2.2.4 Electra Cables has several facilities (warehouses and offices) located across Australia. These are:
- NSW (Head Office): 1/13 Cooper St, Smithfield NSW 2164
- Victoria: 460–464 Hammond Rd, Dandenong South, VIC 3175
- Queensland: 118 Sandstone Pl, Parkinson, QLD 4115
- Western Australia: 24 Harrison Rd, Forrestfield, WA 6058.
- 2.2.5 Electra Cables has significant environmental credentials that are part of our commitment to ethical business practices and that contribute to making us a trusted and preferred supplier to industry. Electra Cables’ full product range is Greenstar certified. Electra’s product lines use PVC that is in line with Best Environmental Practice PVC guidelines and requirements per the Green Building Council of Australia.

2.3 Supply chains

- 2.3.1 Electra Cables has a strong focus on and oversight of the manufacturing of the products it sources and supply. All Electra Cables products can be traced step by step back to manufacturing facilities within its broader corporate group.
- 2.3.2 The primary physical raw material inputs for Electra Cables’ products are copper rod, aluminium rod, and PVC compounds and resins.
- 2.3.3 Guilin International is centrally responsible for the procurement of the raw materials used for production, both from within China and Australia. Electra Cables is directly involved in the sourcing and supply of some key components for its product lines, such as the PVC compounds and resin, and copper rod from within Australian borders.
- 2.3.4 These manufacturing elements are converted and manufactured into product lines in facilities controlled by Guilin International, located in Guangxi, China. The products are then

⁴ Commonwealth Modern Slavery Act 2018: Guidance for reporting entities, available at: <https://modernslaveryregister.gov.au/resources/> .

shipped directly to Electra Cables in Australia. Products are then distributed locally within Australia by Electra.

2.3.5 Primary supplier(s) for the production of Electra Cables' products are:

- suppliers of copper rod, aluminium rod, and PVC compounds and resins within Australia and China;
- entities within the Guilin International group.

2.3.6 Services, including labour, that contribute to Electra's products are from Australia and China.

2.3.7 The countries in Electra's tier 1 supply chain are China and Australia.

2.3.8 Electra Cables' supply chain includes suppliers providing products and services needed for the business' day-to-day operations. This includes logistics, provision of specialised manufacturing products, recycling, office supplies, external legal services, information technology (IT), infrastructure and support services. These goods and services are procured locally in Australia.

2.3.9 Electra Cables is also a supplier in the supply chains of other entities. As a distributor of electrical cable products, Electra Cables is a trusted partner and preferred supplier for the building, mining, and electrical supply industries and throughout 7 major electrical wholesale buying groups.

3 Potential risks in the operations and supply chains

3.1 Our understanding

- 3.1.1 Modern slavery is depriving a person of freedom for commercial gain and in violation of fundamental human rights.
- 3.1.2 It describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery involves serious exploitation, not sub-standard working conditions or the underpayment of workers although this may be unlawful for other reasons.
- 3.1.3 Modern slavery can be complex and multi-faceted and can be difficult to identify.
- 3.1.4 There are modern slavery risks inherent to all businesses that need to continually be identified, assessed, mitigated and addressed as part of our business commitment to ethical practices that are aligned to our values.

3.2 Risk factors

- 3.2.1 Factors that affect the risks of modern slavery practices in an entity's operations and supply chains include inherent industry or sector risks, geographic risks, and supplier-specific risks.
- 3.2.2 Some sectors or industries are considered to have elevated risks due to factors such as informal or unregulated work, reliance on labour from vulnerable populations such as seasonal or migrant workers, or work that takes place in less visible places or at less visible times. Some sectors or industries are considered to have elevated risks due to a documented association with modern slavery practices.
- 3.2.3 Some geographical regions are reported to have higher risks of modern slavery. Modern slavery practices are more prevalent in areas where there is weak governance or rule of law, lack of enforcement (including of labour laws and regulations), conflict, or displacement.
- 3.2.4 Further, specific suppliers may have elevated risks of modern slavery practices. This may be associated with higher risk business models, including outsourcing and labour-hire where there is less oversight over workers' conditions of service. Some specific suppliers may have documented elevated risks, for example where there are reports of human rights or workers' rights concerns.

3.3 Risks identified in our operations

- 3.3.1 During the 2023 reporting period, Electra Cables conducted a more in-depth analysis of the risks of modern slavery practices in its operations as an importer and wholesaler of electrical cables.
- 3.3.2 Electra Cables is not aware of any instances of modern slavery practices within or linked to our direct operations during the reporting period. We are not aware that we caused or contributed to modern slavery practices. However, we acknowledge that there are modern slavery risks inherent to all businesses.

- 3.3.3 Electra's employment contracts comply with the *Fair Work Act 2009* and Electra complies with all aspects of Australian employment law.
- 3.3.4 In recruitment, Electra uses direct hire and recruitment agencies. The recruitment agencies that Electra works with are reputable and subject to Australia's laws and regulations. However, Electra Cables acknowledges it does not have direct oversight over the operations of these recruitment agencies.
- 3.3.5 In relation to service suppliers to support day-to-day operations, such as office cleaning etc., Electra Cables acknowledges it does not have direct oversight of its third-party suppliers, and as such this area of our operations may pose a potential threat of modern slavery practices.
- 3.3.6 In 2023, Electra Cables developed supplier risk questionnaires and processes to conduct internal risk assessments of particular third-party suppliers. Electra Cables anticipates that these assessment exercises will enable Electra to identify and more fully understand the primary risks in its supply chain.

3.4 Risks identified in our supply chains

- 3.4.1 Electra Cables has conducted a high-level risk mapping exercise and assessment of potential risks associated with our supply chains.
- 3.4.2 Electra Cables' supply chain is multi-jurisdictional but not as complex or long as some other supply chains.
- 3.4.3 The electrical cables Electra sells are manufactured in facilities in the Guangxi region of China by companies affiliated with Electra Cables. Major inputs are sourced from Australia and China. Services, including labour, that contribute to Electra's products are also from Australia and China.
- 3.4.4 The supply chain is therefore mainly bi-jurisdictional, comprising China and Australia.
- 3.4.5 Electra Cables' sourcing of raw materials in Australia may involve risks that are considered inherent in the raw materials, mining, and extractive sectors in all countries.
- 3.4.6 The manufacturing of Electra Cables' products takes place in facilities in the Guangxi region of China. Electra Cables is aware of reports of potential modern slavery practices in some areas of China. In the specific facilities in which Electra Cables' products are manufactured, Electra understands that there is no involvement of prison labour.
- 3.4.7 Based on Electra's knowledge of its affiliated manufacturing entities located in China, these entities have strong governance structures and have a strong record of treating workers well. There is no record of human rights violations. As Electra is aware, all of these manufacturing entities are compliant with local laws and regulations.
- 3.4.8 Based on Electra's knowledge about the manufacturing facilities of the Guilin International group, work conditions are not of concern in terms of modern slavery practices. Several of the Guilin International group's manufacturing facilities were for many years collective worker-owned facilities, and the culture in these facilities have remained focused on high morale and well-being for workers.

- 3.4.9 Following our high-level review of our supply chains and operations, we have identified that our highest modern slavery risks are likely to be within our indirect supply chain (i.e., beyond tier 1). Electra Cables acknowledges that at this stage, it is difficult to assess with accuracy the risks that are present at that level in our indirect supply chain.

4 How Electra Cables assesses and addresses risks

4.1 Actions to assess and address risks

- 4.1.1 Electra Cables recognises the importance of assessing and addressing risks of modern slavery in our operations and supply chains. Electra is committed to taking proactive measures to do so, and continuously improving its efforts.

- 4.1.2 To this end, Electra Cables has implemented or will seek to implement actions such as:

Building awareness and understanding: building awareness and understanding of modern slavery risks and the Australian modern slavery statement reporting process.

Risk assessment: conducting regular assessments to identify and evaluate the potential risks of modern slavery practices in our operations and supply chains, including analysing countries, industries, and suppliers with which we engage, in order to identify higher risk areas.

Supplier due diligence: assessing suppliers' or potential suppliers' labour practices, human rights policies and compliance with relevant laws and regulations.

Supplier engagement and code of conduct: developing and applying a Supplier Code of Conduct and Integrity that outlines our expectations regarding labour standards, human rights, and ethical business practices, and communicating these requirements to suppliers; prioritising working with suppliers who share our values.

Training, education and awareness raising: providing education and training, and raising awareness, for key personnel on the risks and indicators of modern slavery practices, and steps to take to identify and report concerns.

Collaboration and engagement: actively engaging with key business partners and industry peers to share best practices on modern slavery governance and reporting policies and procedures.

Mitigation and remediation: taking measures to mitigate risks, including working collaboratively with suppliers to identify and address areas of concern if needed, and implementing processes for remediation should that become applicable.

Continuous improvement: continuously improving on efforts to address modern slavery risks by regularly reviewing and updating policies, procedures, and practices to ensure they remain effective and aligned with best practices.

4.2 Actions taken during this reporting period

- 4.2.1 During the reporting period of 1 January 2023 to 31 December 2023, as part of its commitment to continuous improvement, Electra Cables undertook several actions to improve its modern slavery governance and develop and implement new practices.
- 4.2.2 Electra undertook a more comprehensive review of its modern slavery governance and reporting, including working with independent experts to assess existing practice. The findings and recommendations from this review were implemented and incorporated into our ongoing improvement efforts. This culminated in the development of a Modern Slavery Governance Framework that provides for improved policies, processes and effectiveness indicators.
- 4.2.3 The actions taken during this reporting period included:
- Developing a company-wide policy on modern slavery for Electra Cables.
 - Developing modern-slavery related clauses for standard contractual terms.
 - Developing a more in-depth and detailed risk assessment framework to regularly assess risks associated with the company's own operations, supply chain and specific suppliers.
 - Developing Electra's supplier due diligence process, including ways of seeking further information from suppliers. In particular, this has been through developing Modern Slavery Assessment questionnaires for completion by key suppliers, through assessments of available information on labour practices, human rights policies and available information on compliance with relevant laws and regulations.
 - Applying a Supplier Code of Conduct and Integrity that outlines our expectations regarding labour standards, human rights, and ethical business practices, and communicating these requirements to suppliers; prioritising working with suppliers who share our values.
 - Developing risk management measures to meet any identified risks, including working collaboratively with suppliers to identify gaps.
 - Training, education and awareness-raising for relevant employees on the risks and indicators of modern slavery, and steps to take to identify and report concerns.
- 4.2.4 Electra also further worked on building awareness of risks with key business partners and stakeholders. Electra continued to review operations and supply chain risk in the context of complying with preferred supplier assessments, and engaged with key business partners and industry peers on best practices.
- 4.2.5 Electra continued to conduct a high-level risk assessment of its suppliers prior to contract award and engaged key suppliers based on risk factors.
- 4.2.6 Electra is committed to continue taking proactive measures to assess and address risks of modern slavery in its operations and supply chains.

5 Assessing the effectiveness of actions and policies

5.1 Assessment of effectiveness

5.1.1 Electra Cables understands the importance of measuring our progress and continuously improving our efforts to address risks of modern slavery practices in our operations and supply chains. By evaluating the effectiveness of our efforts, we can ensure the actions we are taking are able to drive positive change and make a positive impact in the fight against modern slavery.

5.1.2 During the reporting period 1 January 2023 – 31 December 2023, Electra Cables undertook a more comprehensive review of its modern slavery governance and reporting, and developed a Modern Slavery Governance Framework, which includes frameworks, policies and processes to assess the effectiveness of actions taken.

5.1.3 This includes:

1. Performance indicators

We will seek to assess the success of our actions to identify and address modern slavery practices in any part of our operations and supply chains, and the effectiveness of our actions, with performance indicators. For example:

- proportion of new standard contracts with modern slavery clauses included;
- proportion of suppliers completing our modern slavery questionnaire;
- completion rates for modern slavery awareness training; and
- whether any reported grievances have been investigated, reported on and remediated.

2. Supplier performance evaluation

We will evaluate the performance of our suppliers against our Supplier Code of Conduct and Integrity and other relevant standards.

3. Stakeholder engagement

We will engage with stakeholders, including employees, suppliers, and customers, to gather feedback and insights on the effectiveness of our actions. We value these perspectives and will use this information to measure our performance in addressing modern slavery risks.

4. Internal reviews and continuous improvement

We will conduct regular internal reviews to assess our processes, systems and mitigation measures to measure their effectiveness in identifying and responding to modern slavery risks.

- 5.1.4 We are committed to continuously improving our actions and strategies to address modern slavery risks to ensure that they remain effective and aligned with emerging best practices.
- 5.1.5 Electra acknowledges that its processes to assess and address modern slavery risks in its operations and supply chain will continue to develop over time, in line with its commitment to continuous improvement, which will extend to its frameworks to assess the effectiveness of actions taken.
- 5.1.6 We will continue to work on developing our 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.
- 5.1.7 We will seek to monitor the effectiveness of the processes and procedures to address the modern slavery risks that our business causes, contributes to, or is directly linked to, in line with the UN Guiding Principles.

6 Consultation with other entities

- 6.1 Electra Cables does not own or control any other entities. Electra Cables is a minority shareholder in several affiliated companies that are the subsidiaries of Guilin International. Electra Cables has undertaken enquiries and consultation with affiliated companies in the Guilin Group.

7 Commitments for continued improvements

- 7.1 For the reporting period 1 January 2024 – 31 December 2024 and beyond, Electra Cables commits to reviewing and improving our management of modern slavery risks, applying a continuous improvement approach based on feedback, measuring effectiveness, and further maturing our approach in assessing and addressing or managing risks in line with our Modern Slavery Governance Framework.
- 7.2 We will continue to engage with key business partners to both support their approach to modern slavery risks and to strengthen our own approach.
- 7.3 We will seek to implement the following actions:
- Requiring new and existing suppliers to include contractual terms in new contracts.
 - Requiring existing suppliers to update existing contracts to include contractual terms.
 - Requiring existing suppliers to complete and return questionnaires or surveys.
 - Requesting information from key suppliers regarding any audits.
 - Additional training and awareness raising with employees, to assist with identification of risks of modern slavery practices in operations, recognition of risk indicators, and appropriate responses.
- 7.4 We will explore the possibility of verification or verification visits by Electra's representatives or third party to overseas facilities.
- 7.5 We will explore implementing a grievance reporting channel in our processes such as a response pathway or identified contact point.



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MODERN SLAVERY ACT 2018 (CTH) STATEMENT ANNEXURE

Principal Governing Body Approval

This statement was approved by the *principal governing body* of Electra Cables (Aust.) Pty Ltd as defined by the *Modern Slavery Act 2018 (Cth)*⁵ ("the Act") on 7 February 2024.

Signature of Responsible Board Member

This Modern Slavery Statement is signed by a *responsible member* of Electra Cables (Aust.) Pty Ltd as defined by the Act⁶:

Luke Zhou

Deputy Managing Director

12 June 2024

⁵ 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.

⁶ 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.

Mandatory Criteria

Please indicate the page number/s of your statement that address each of the mandatory criteria in section 16 of the Act are as follows:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	4
b) Describe the reporting entity's structure, operations and supply chains.	4–6
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.	7–9
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.	9–10
e) Describe how the reporting entity assesses the effectiveness of these actions.	11–12
f) Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).*	Do not own or control any other entities
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	13

* 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.

