



Modern Slavery Statement

NHP Electrical Engineering Products Pty Ltd

2025 / 2026



www.nhp.com.au

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Purpose

This Modern Slavery Statement has been prepared in compliance with the Modern Slavery Act 2018 (Cth). It outlines the measures implemented by NHP Electrical Engineering Products Pty Ltd ("NHP") to identify and mitigate risks of modern slavery within our operations and supply chain. The Statement serves as an essential instrument for fostering transparency and accountability, and it reflects our ongoing commitment to ethical business conduct and continuous improvement in combating modern slavery.

What is Modern Slavery?

Modern slavery is a term that encompasses a variety of exploitative practices and is recognised by different names across various contexts. At its core, modern slavery describes situations in which individuals are subjected to exploitation and are unable to refuse or escape these circumstances due to the presence of threats, violence, coercion, or deception. Such exploitation can occur in multiple forms and includes, but is not limited to, the following activities:

- Slavery: where ownership is exercised over an individual
- Servitude: involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them.
- Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery. These practices may also escalate into modern slavery if not addressed.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain, and amount to a violation of an individual's fundamental human rights.

1. REPORTING ENTITY

Our Business

NHP is a privately owned Australian electrical engineering products distributor and manufacturer. Its Head office is in Melbourne, Australia with around 800 employees located across more than 15 branches in Australia and New Zealand. NHP has been trading since October 1968.

Our Values

NHP's values clearly articulate the standards of conduct and behaviour expected from all employees when representing the company. We are dedicated to upholding the highest levels of professionalism and ethical integrity throughout our operations and supply chain management. NHP remains committed to responsible business practices and to ensuring that human rights are respected across all areas under our influence.

NHP's Values – **A**gility, **T**eam Success, **O**wnership and **M**ake a Difference (ATOM) - are the compass for our actions, decisions, and behaviours.

2. STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Organisational Structure & Operations

NHP's core operations are driven by an extensive sales team, complemented by product management and technical specialists. The company's supply chain encompasses the sourcing, manufacturing, and distribution of approximately 70,000 SKUs utilised across construction, mining, manufacturing, and commercial building sectors. In line with this, NHP sources a number of products from overseas manufacturers based in Europe, the United Kingdom, America, and Asia, and efficiently manages their distribution within Australia and New Zealand.

Supply Chain Mapping

NHP conducts ongoing risk assessments regarding modern slavery within our operations and supply chains, utilising resources such as the Global Slavery Index and other relevant materials to evaluate potential risks. Multiple factors are considered to identify practices associated with modern slavery in countries where our suppliers operate. This process includes online supplier audits, which are reviewed bi-annually in collaboration with supply line partners, along with consultation from Product Managers who have completed applicable training.

NHP also routinely prepares a report mapping the countries of origin for products involved in our manufacturing or supplied to customers. This report is regularly cross-referenced with data from the Global Slavery Index to effectively identify and monitor countries that may present higher risks.

3. MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

Risk of Modern Slavery in our Supply Chain and Operations

Based on the audits and mapping reports conducted, NHP has determined that less than 33% of our goods and services are sourced from outside Australia. By referencing global frameworks such as the Global Slavery Index, we have verified that we do not procure products from any of the countries identified as having the highest prevalence of modern slavery.

Nevertheless, NHP recognises that the risk of modern slavery may be elevated in certain countries historically identified as high risk. Accordingly, we closely monitor these regions and acknowledge that both China and Malaysia are still classified as at-risk countries for electronics imports into Australia. We are continually evaluating the need to implement more frequent assessments of these suppliers.

Risks of modern slavery practices in NHP's operations may arise through services performed by lower-skilled workforces, including contract cleaning. These risks may include migrant worker exploitation, underpayment, or excessive working hours.

NHP has also identified potential supply chain risks of modern slavery practices, including:

- Products that may contain conflict minerals or materials sourced from higher-risk regions or industries.
- PPE or similar goods sourced from manufacturers or suppliers previously linked to higher exposure to modern slavery practices.

Based on current assessments, these risks are considered low within NHP's operations. NHP remains committed to sustainable procurement practices that support responsible sourcing and align with applicable human rights regulations.

4. DUE DILIGENCE AND REMEDIATION PROCESSES

Supply Chain Management

NHP applied comprehensive due diligence processes when assessing prospective supply line partners (SLPs) and regularly reviewed its existing supplier base throughout the reporting period. These processes included:

- Mapping the supply chain to identify product-specific and geographic risks associated with modern slavery and human trafficking. This assessment considers recognised global frameworks, including the Global Slavery Index, as well as relevant national anti-slavery guidance and communications.
- Assessing modern slavery and human trafficking risks before engaging any new SLP.
- Requiring Product Managers to complete a Take 5 checklist, which is provided as part of the assessment kit, when:
 - assessing a prospective SLP; or
 - reviewing an existing SLP that has opened a new factory or manufacturing site.
- Using the completed Take 5 checklist as an observation tool to review workplace practices and assess alignment with NHP's modern slavery requirements and Supplier Code of Conduct.
 - Any concerns identified through this process are escalated to senior management and managed in accordance with NHP's internal processes.
- Re-engaging with existing SLPs every two years through an automated questionnaire process managed by the relevant Product Manager. This process continues as part of NHP's ongoing supplier due diligence program.
- Requiring existing SLPs to have successfully completed the applicable questionnaire before a supply contract is renewed.
- Conducting targeted supplier audits or assessments where elevated modern slavery or human trafficking risks are identified.
- Requiring SLPs to implement corrective or improvement plans where concerns are identified.
- Applying appropriate sanctions where an SLP failed to complete an agreed improvement plan or committed a significant breach of the Supplier Code of Conduct. Sanctions could include termination of the business relationship.

NHP continued to assess the effectiveness of its modern slavery due diligence processes across governance, procurement, supply chain, human resources, and reporting activities. This ongoing review supported continuous improvement and helped ensure that identified risks were monitored, managed, and addressed in line with NHP's modern slavery requirements, Supplier Code of Conduct, and broader compliance obligations.

Supplier Code of Conduct

NHP is actively committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship. This applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

NHP expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with the Supplier Code of Conduct and to act in a way that is consistent with its values. The Company will only do business with organisations who fully comply with this code, or those who are taking verifiable steps towards compliance.

5. ASSESSING EFFECTIVENESS OF OUR ACTIONS

To support the commitments in this Statement, NHP will continue reviewing and strengthening measures established in previous reporting periods, including:

- Reviewing the supplier base biannually to identify areas of greatest potential modern slavery exposure within the supply chain.
- Continuing to improve due diligence and risk assessment processes for existing and prospective supply line partners.
- Regularly reviewing recognised resources, including the Global Slavery Index, to monitor changes in country risk profiles across NHP's supply chain.
- Continuing automated supplier audits and assessments to support secure, consistent information collection.
- Reviewing contractual documentation to ensure it clearly prohibits slavery, servitude, forced or compulsory labour, human trafficking, and exploitative child labour.
- Engaging with prospective suppliers to understand the measures they have implemented to prevent modern slavery and support compliance with NHP's Modern Slavery Statement, Modern Slavery Policy, and Supplier Code of Conduct.
- Requiring contracted suppliers to promote equivalent standards throughout their own supply chains.
- Conducting internal reviews with Product Managers and senior executives to maintain awareness of, and alignment with, NHP's processes for identifying and managing modern slavery risks across its operations and supply chain.
- Continuing to reserve the right to terminate contractual arrangements where a supplier breaches this Statement or the Supplier Code of Conduct.

6. CONSULTATION

This statement applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

NHP expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this statement and to act in a way that is consistent with NHPs values. The Company will only do business with

organisations who fully comply with this statement and our Supplier Code of Conduct, or those who are taking verifiable steps towards compliance.

NHP addresses the risk of modern slavery through its onboarding process and ongoing education of its contractors through its safety management portal.

We note that NHP do not own or control any other entities and therefore criteria 16(1)(f) is not applicable.

7. OTHER RELEVANT INFORMATION

Relevant Policies

NHP maintains the following policies to support the identification, management and prevention of modern slavery and human trafficking risks across its operations and supply chain:

- Human Resources Policy – Sets expectations for fair and respectful treatment of employees, including zero tolerance for violence, harassment, intimidation or threats, and requires employees to be paid at least the applicable minimum wage.
- Modern Slavery Policy – Provides the framework for identifying, managing and reducing modern slavery risks across NHP's operations and supply chain, while supporting legal compliance and awareness.
- Procurement Policy – Requires fair, transparent and accountable purchasing practices, with emphasis on selecting suppliers that demonstrate ethical conduct, legal compliance, respect for human rights and responsible business practices.
- Recruitment Policy – Requires NHP to use reputable employment agencies and verify their practices and licences before engaging agency workers.
- Whistleblowing Policy – Encourages employees, customers and business partners to report concerns about NHP's activities or supply chain, including modern slavery risks, without fear of retaliation.
- Code of Conduct Policy – Sets out the behaviour expected of current and prospective employees when representing NHP and applies to all employees.

NHP regularly review their policies to ensure they remain effective and relevant in addressing emerging risks associated with modern slavery. We engage in periodic policy audits and seek feedback from staff and stakeholders to further strengthen our approach to ethical business practices and compliance. This commitment supports our ongoing efforts to maintain transparency, integrity, and accountability throughout our operations and supply chain.

Breaches of This Statement

A breach of this Statement by any employee, director, or officer of the Company may result in disciplinary action in accordance with the Company's Disciplinary Procedure. In cases of serious breaches, such conduct may be deemed gross misconduct and could result in immediate termination of employment.

All employees are required to fully cooperate with any investigation into suspected breaches of this Statement or any associated processes or procedures.

Should any aspect of this Statement require clarification, employees are encouraged to seek guidance from the Human Resources department.

Communication and Employee Awareness Training

Line Managers are responsible for ensuring that all relevant employees receive sufficient training on this statement, as well as any associated procedures that are pertinent to their specific roles. This approach helps to ensure that all staff members are aware of their responsibilities and the standards expected in relation to modern slavery practices.

Product Managers at NHP receive targeted training on the requirements set out in the Modern Slavery Act, with a particular focus on how these requirements impact their interactions with supply line partners. This specialised training ensures that Product Managers can effectively identify and manage risks within the supply chain.

NHP is committed to the ongoing review and enhancement of training and communication efforts regarding modern slavery risks and trading requirements. This includes regular updates to training content and methods of communication to ensure all contractors and employees are kept informed of current expectations and obligations.

Furthermore, NHP has undertaken comprehensive internal training initiatives across all departments within the Supply Chain. These sessions are designed to reinforce awareness and understanding of the policy, and to equip staff with the knowledge needed to identify and address potential modern slavery risks within their area of responsibility.

Responsibility for This Policy

The Executive Board holds ultimate responsibility for this Statement and for ensuring that the Company fulfills all legal and ethical obligations arising therefrom.

The Chief Executive Officer (CEO) or Managing Director is entrusted with primary, day-to-day responsibility for the implementation of this Statement. This includes monitoring its application and ensuring that appropriate processes and control systems are established, maintained, and amended as necessary to ensure the effective operation of the Statement.

Each member of the Executive Team is accountable for ensuring that their respective functions comply with the provisions of this Statement in the daily execution of their duties.

Status of This Statement

This Modern Slavery Statement is subject to periodic review by the Executive Board. This notice outlines the Company's current practices. NHP will revise the statement as necessary to reflect applicable legal and operational requirements.

Approval of Statement

This Statement was approved by the board of NHP Electrical Engineering Products Pty Ltd on 26 August 2026.



Julian Britto

Managing Director / CEO

26 August 2026