

# Modern Slavery Statement

For the year ended 30 June 2020

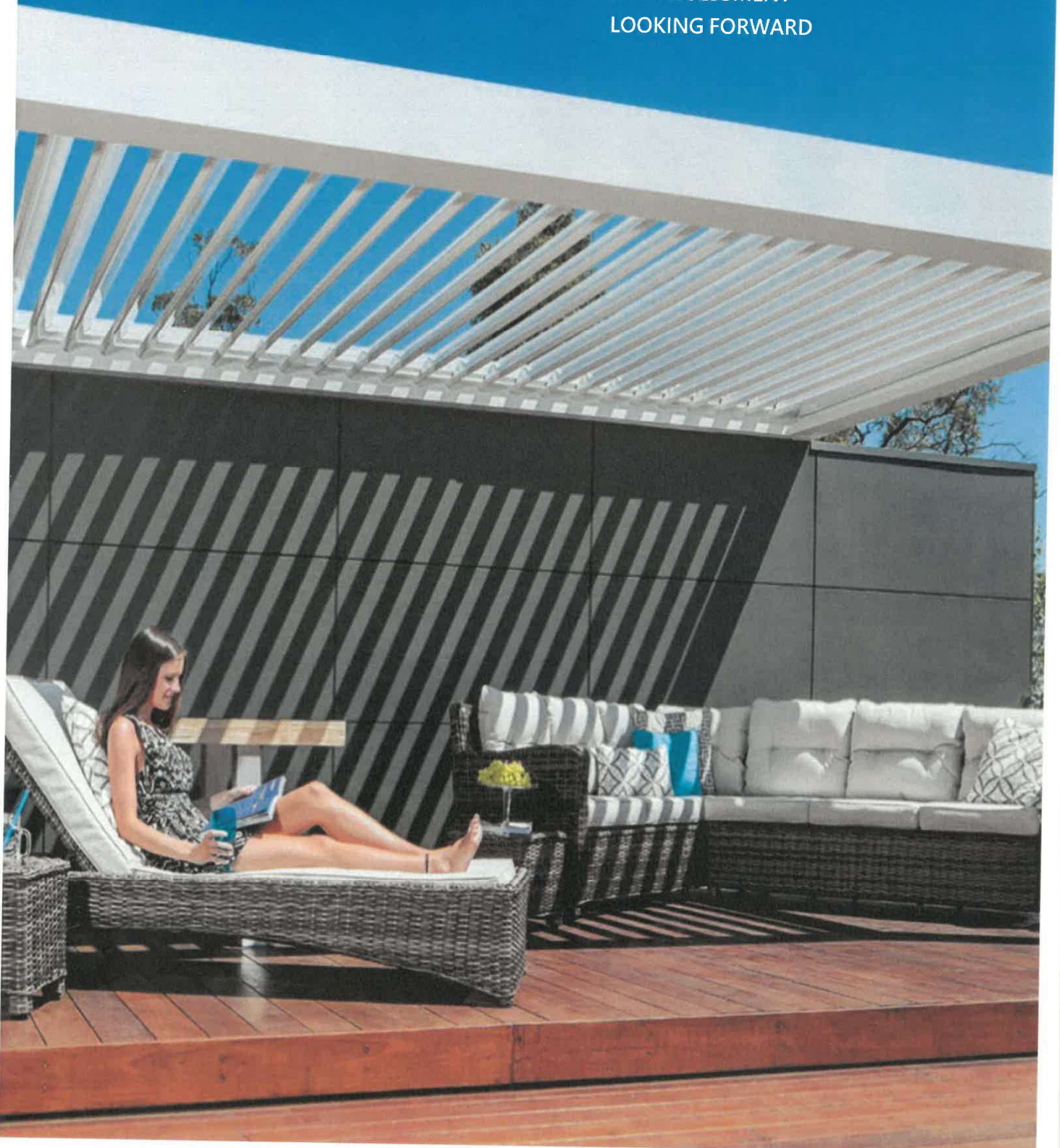
How To.



**STRATCO**

# CONTENTS

OUR APPROACH  
OUR BUSINESS  
POLICIES AND GOVERNANCE  
DUE DILIGENCE  
RISK ASSESSMENT  
LOOKING FORWARD



## OUR APPROACH

This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by the Stratco Group <sup>1</sup>to address modern slavery and risks in our business and supply chain for the financial year ended 30 June 2020.

### Our Approach

As this is our first statement, it sets the foundation for our intention and actions to identify risks within our supply chain in order to develop robust policies to meet the requirements of the UN Guiding Principles on Business and Human Rights and the Australian Modern Slavery Act 2018. Our statement outlines our efforts to scope our operations in the context of the modern slavery risk in order to identify the risk of slavery, servitude, forced labour and human trafficking across our business and supply chain. It also identifies the most appropriate response to risk and our ongoing commitment.

At Stratco, we recognise that slavery and human trafficking can occur in many forms, as considered in the Act. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

Stratco acknowledges its responsibility to respect human rights in operations and supply chain. This responsibility includes taking action to prevent, mitigate and where appropriate, remedy modern slavery in operations and supply chain both domestically and abroad.

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<sup>1</sup> Stratco Group includes Stratco (Australia) Pty Ltd, Stratco (Qld) Pty Ltd, Stratco (NSW) Pty Ltd, Stratco Pty Ltd, Stratco (WA) Pty Ltd, Stratco (Alice Springs) Pty Ltd  
Page 3 of 8

## OUR BUSINESS

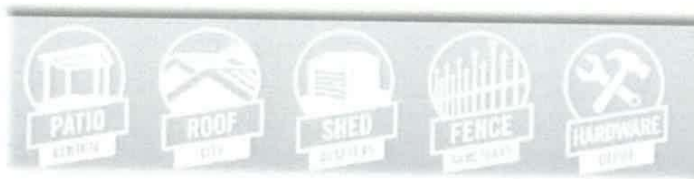
In 1948 Stratco Metal Pty Ltd was formed to produce and market high quality sheet metal products from its Adelaide home.

Today, Stratco is a significant producer of quality building and home improvement products in Australia and New Zealand with a network of manufacturing sites, retail stores and sales offices throughout each country.

We are committed to providing innovative, quality products backed by qualified people. This commitment to manufacturing has helped to drive our continued expansion and growth.

Our business can be best described as having an omni channel structure supporting retail and trade outlets, business to business and ecommerce. Whilst we manufacture many building and home improvement products at our company owned and operated manufacturing sites, we have a multi-tiered supply chain where products and raw materials are sourced both domestically and internationally.

Our manufactured products have a focus on the building sector whether it be residential or commercial and fall into the following categories:



We also offer thousands of complimentary products sourced through our domestic and international supply chain which cater for the residential backyard environment and include barbeques, lawn and garden products and outdoor furniture.



## OUR POLICIES & GOVERNANCE

**Stratco is committed to being a responsible business.**

**We continually strive to work with suppliers who share the same values.**

With regard to our employees, we uphold high standards and comply fully with the relevant employment laws and Right to Work checks for the countries within which we operate. We have recruitment policies and clear standards of conduct which are included in our employee handbook and available on our internal website.

All Australian and New Zealand based employees whether they be newly recruited or long term, are enrolled in our Learning Management System (LMS). This system assigns training modules on workplace practices, behaviours and products and is managed for compliance and completeness by each manager. Our LMS is to be updated with a Modern Slavery module to raise general awareness and a greater understanding of this topic. The training status of each team is reported at Executive level.

Our centralised procurement team are guided by our purchasing policy which sets out our expectations regarding quality and ethical procurement.

All employees have access to a whistleblowing line and are encouraged to report any concerns regarding any matters. No reports were registered via the whistleblowing line in the 2019/20 financial year relating to modern slavery.

# DUE DILIGENCE

We acknowledge that the high volume of products procured presents added complexity to our supply chain and may potentially cause or contribute to slavery practices.

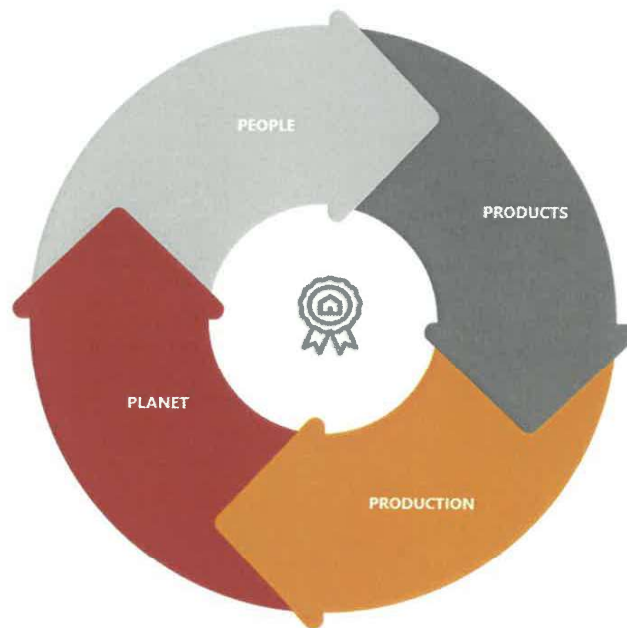
In compiling our first Modern Slavery Report, we have identified that additional effort must be committed to supplier due diligence. Whilst our supplier selection process is comprehensive, it has not been thoroughly reviewed with Modern Slavery in mind. As a result, we are committed to undertaking a review of this process prior to developing a centralised repository of Modern Slavery documentation which identifies the following:



This comprehensive mapping of our global procurement channels and manufacturing processes will allow us to further understand both the actual and potential risk of modern slavery in our business and supply chain.

## RISK ASSESSMENT

In order to determine and rank risk, our supply chain will be assessed on the following principles:



Behind these principles detailed Policies will be developed to guide us on industry standards & benchmarks

The above observations will be collated in a centralised Risk Matrix. All relevant documentation and certifications will be assessed and evaluated to determine our risk profile. This Matrix will be reviewed by our National Supply team and communicated to the Group Operations team on a bi-annual basis.

The Modern Slavery Risk Matrix will form the basis of our future Modern Slavery Statements and will be used to measure our progress in this domain.

## LOOKING FORWARD

Stratco is committed to respecting the human rights (basic rights and freedoms) of every individual involved in our business including our customers, employees, workers in our supply chain and local communities.

We are committed to promoting the social, ethical, environmental and health and safety practices within our business and in our supply chain through:

1. Sourcing from suppliers that share our commitment to respect human rights and the environment by requiring them to comply with our Supply Chain Workplace Standards.
2. Identifying high risk suppliers or products that require further assessment
3. Taking decisive and swift action in the event that critical failings are identified and collaborate with suppliers to improve standards over time.
4. Extending our risk assessment and audit programme to incorporate our wider supply chain and address risks associated with raw materials and freight.
5. Training key employees in modern slavery

We will continue to develop our approach, review our progress and publish an updated statement annually.

This statement was approved by the undersigned directors in their role as Stratco's principal governing body on 17 May, 2021



**Alf Stratton**  
Chairman/Director  
Stratco Australia Pty. Ltd.  
Date: 17 May, 2021



**Ben Miels**  
Chief Executive Officer/Director  
Stratco Australia Pty. Ltd.  
Date: 17 May, 2021