



Bookleaf Pty Ltd atf Eden Unit Trust t/a Holman Industries
A.B.N. 29 385 212 665 A.C.N. 009 036 202

Holman Industries

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Holman Industries Modern Slavery Statement FY2023

This statement details the steps Holman Industries has taken to assess modern slavery risks within its operations during the FY23 period, inclusive of its supply chain, and the ongoing commitments and actions being taken to help manage these risks.

This statement is made subject to the Modern Slavery Act 2018 (Cth) ('Act') for the financial year ending 30 June 2023 on behalf of Bookleaf Pty Ltd as trustee for Eden Unit Trust trading as Holman Industries.

Company

Operating since 1966, Holman Industries is an Australian-owned company specialising in garden hardware products for irrigation, plumbing, garden lighting and lifestyle. Recently diversifying, the company also operates two large plumbing PVC manufacturing facilities in Brisbane and Perth and a Fabrication facility in QLD using domestically sourced raw materials.

Holman Industries as a predominately wholesale business distributes products throughout Australia and New Zealand with small exports shipped to the USA, UAE, Cyprus, Thailand, and Vietnam. Holman Industries imports manufactured goods from suppliers in China, the USA, and Cyprus into their warehouses in Perth, Melbourne, Brisbane, and Sydney.

Holman Industries is committed to operating the business lawfully and ethically and only in working with suppliers that are aligned with similar values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery-like practices, human trafficking, and child labour. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection, staff inclusion and diversity.

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Supply Chain

The supply chain in which Holman Industries operates is a simple and straightforward network that strives to engage suppliers with the same moral reputation, ethics, and reliable business practices as its own.

All labour hire agencies, raw materials, and other businesses utilised by Holman Industries during its operations are primarily companies incorporated in Australia and respectable businesses across Asia, including Taiwan and Hong Kong.

The company’s senior management team, work in collaboration with the internal and external compliance advisors and have numerous policies and procedures in place that support the day-to-day business operations. As a certified Australian Trusted Trader, the company operates and ensures all staff and suppliers have relevant background security checks, are well trained, hold all required rights to work, have valid visas and operate all business dealings under the core values of Holman Industries and its senior management.

Holman Industries does not knowingly contract with or engage any businesses that are involved in modern slavery or human trafficking, Holman Industries requires its suppliers to comply with all relevant laws and regulations and ensures that due diligence checks are carried out prior to the engagement of third parties.

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Risk of Modern Slavery:

Our senior management team along with our internal compliance officer consistently review the company’s policies and procedures.

In FY23, by engaging with an external unbiased auditor numerous detailed risk assessments were conducted. The assessment included reviewing the overall business model, each of the operating sites (7 in total), and the two domestic businesses that supply our raw material for PVC manufacturing to assess where risks in the current supply chain may exist.

A key part of this assessment was understanding the existing controls in place and identifying any potential gaps. Modern Slavery risks identified through the assessment included:

Raw Materials - These materials can be processed in unfavourable conditions which pose a risk of contamination and or may not be what they claim to be if purchased from unknown or irregular suppliers.

Purchasing – Facilities that display unrealistic delivery timeframes may require engaging in excessive working hours and conditions to make cost savings on labour hire or rapidly increase workforce size.

Sourcing - Holman Industries are aware that manufacturing facilities, particularly those outside of Australia and New Zealand, may have poor working conditions. These conditions increase the risk for slavery-like practices to occur.

Labour and Labour Hire – Due to Holman Industries’ location with offices in Australia and New Zealand, most employees are directly employed and adhere to the company’s strict induction and Code of Conduct policies. The use of Labour hire services is utilised in peak season trade and engagement is from reputable companies and adheres to the Company’s Code of Conduct and other relevant corporate policies and procedures.

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Actions to Manage Modern Slavery:

Holman Industries management set clear expectations that all employees and suppliers should be alerted to involvement in modern slavery and should any employee be made aware of any risk in our supply chain then a formal report to the Managing Director is submitted.

Actions Holman Industries have adopted to help mitigate Modern Slavery are:

Where possible the company works directly with suppliers and producers. Long-distance relationships take work which is why regular visits to our overseas suppliers to see their operations are important to senior management and the company.

As an importer and manufacturer of raw goods, Holman is aware of the risks associated with the processing of these types of materials. The company takes pride in sourcing all our raw products domestically, sustainably and from reputable sources that also have stringent compliance with the Australian Modern Slavery Act.

In the period stipulated for the statement, senior management and the external compliance advisor have been on numerous trips to visit all the companies' overseas suppliers. Undertaking full physical site visits, meeting senior management, and reviewing company policies and procedures. Ensuring that the reputation, values, and ethos of the businesses have been upheld and continue to operate in the same way from the first engagement.

Holman Industries with guidance from external compliance consultants have assisted in the Implementation of several practices to enable us to enforce the standards to prevent the risk of Modern Slavery in our supply chains. These practices have assisted both Holman and our suppliers and encouraged ongoing trust, transparency, and full disclosure of any such practices within the business's operations.

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Assessment of the effectiveness of these actions:

The transparency and strong relationships the company holds with our suppliers mean that shared values and policies are maintained.

Holman Industries recognises the value of continual improvement and the importance of assessing the effectiveness of the actions taken to address modern slavery risks through reporting on the program of works.

This will be continued to be monitored and documented throughout the year 2022/3 and beyond.

This statement was approved by the board of trustees for Bookleaf Pty Ltd as trustee for Eden Unit Trust trading as Holman Industries on 30th June 2023.

Walter J. Edwards AM
Trustee
Bookleaf Pty Ltd

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