

# Modern Slavery Statement

Wilson & Bradley Pty Ltd

2024/2025



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## Introduction & Managing Director's Message

At Wilson & Bradley, our core values have guided us since our establishment in 1976. Safety, integrity, and respect for each other is the foundation of how we conduct business

We believe in being honest, transparent, and accountable for all our actions, both internally and externally to our business. We respect the safety and wellbeing of each other, and this extends to everyone in our operations and supply chain.

As one of Australia's leading distributors of premium cabinet hardware, we recognise our responsibility to ensure that our business operations and supply chains are free from modern slavery. We are committed to upholding human rights and ensuring that all workers involved in our business, whether directly employed by us or working within our supply chain, are treated with dignity and respect.

Since becoming part of the Blum Group in 2019, we have continued to strengthen our commitment to ethical sourcing and responsible business practices. Our partnership with Blum, a company with strong values aligned with our own, provides us with additional resources and expertise to combat modern slavery risks effectively.

This statement outlines the actions we have taken during the reporting period to identify, assess, and address modern slavery risks in our operations and supply chains. We acknowledge that combating modern slavery is an ongoing journey, and we are committed to continuous improvement in our processes, policies, and practices.



Rod Pearce  
Managing Director  
Wilson & Bradley Pty Ltd

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) by Wilson & Bradley Pty Ltd (ABN 56 630 675 375) for the financial year ending 30 June 2025.

# About Wilson & Bradley

## Our Structure

Wilson & Bradley Pty Ltd is a leading Australian distributor of premium cabinet hardware, established in 1976 by Graham and Lorna Wilson and John Bradley.

After more than 40 years of growth and success as a family-owned business, we became part of the Blum Group in 2019. This strategic acquisition has allowed us to strengthen our market position while maintaining the personalised, customer-focused service that has always been our mission.

As a wholly owned subsidiary of Blum, we benefit from our parent company's extensive experience, robust compliance systems, and commitment to ethical business practices. Blum is one of the world's leading manufacturers of fittings for high-quality kitchens and furniture, with global headquarters in Vorarlberg, Austria, and operations in over 120 countries.



## Corporate Structure



### Parent Company

Julius Blum GmbH (Austria)



### Australian Entity

Wilson & Bradley Pty Ltd



### Ownership

100% owned by Julius Blum GmbH

### Reporting Entity

Wilson & Bradley Pty Ltd does not own or control any other entities

## Our Operations

Wilson & Bradley operates a national network of showrooms and distribution facilities across Australia, employing over 146 people nationally.

Our workforce is dedicated to providing excellent customer service and supporting the Australian kitchen, cabinetmaking, and furniture manufacturing industries.

### Operating Locations



#### Preston (Head Office)

Victoria

- Headquarters, Distribution, Showroom
- 66 employees



#### Greystanes

New South Wales

- Distribution, Showroom
- 35 employees



#### Willawong

Queensland

- Distribution, Showroom
- 19 employees



#### Landsdale

Western Australia

- Distribution, Showroom
- 15 employees



#### Woodville

Adelaide

- Distribution, Showroom
- 11 employees



## Employment Structure

146

TOTAL WILSON & BRADLEY  
EMPLOYEES

137

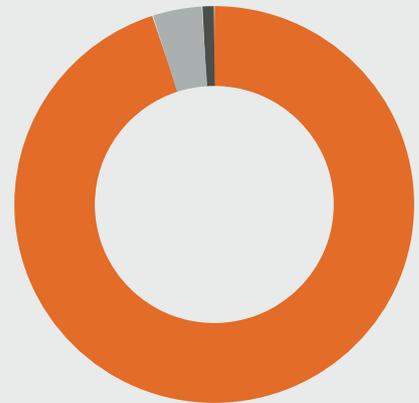
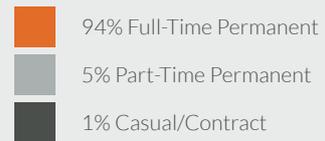
FULL-TIME PERMANENT

7

PART-TIME PERMANENT

2

CASUAL/CONTRACT



### Key Business Activities

1. Distribution and wholesale of premium cabinet hardware

2. E-commerce platform and online ordering systems

3. Showroom operations and customer demonstrations

4. Technical support and product training

5. Customer service and account management

6. Warehousing and logistics

7. Marketing and business development

8. Finance and administration

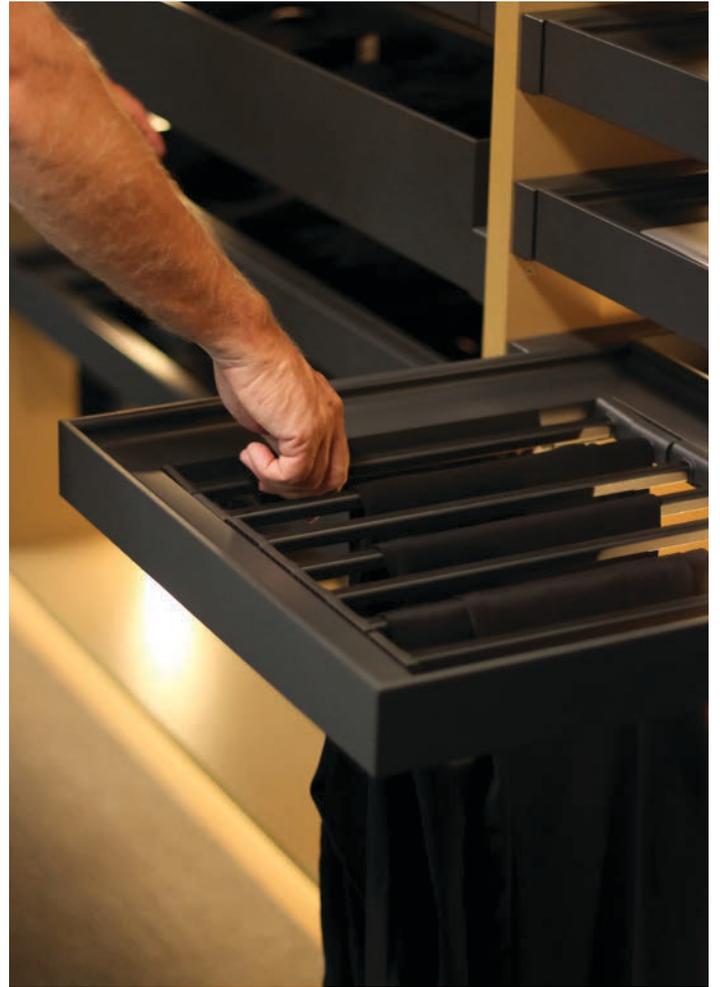
## Business Model

Our business model is built on delivering the latest in premium cabinet hardware through a user-friendly e-commerce platform and supported by personalised service from the entire Wilson & Bradley team.

This approach builds loyalty and trust with our clients, helping them create value and form strong, lasting relationships with their customers.

### We serve a diverse range of customers including:

- Kitchen and cabinet manufacturers
- Commercial furniture manufacturers
- Reproduction and furniture makers
- Retail customers directly and through partnerships (including Bunnings stores nationally)
- Trade professionals and contractors
- Architects and interior designers



# Our Supply Chain

Wilson & Bradley's supply chain is structured around our commitment to providing premium, high-quality cabinet hardware from trusted European and international manufacturers.

## Supply Chain Structure

### 1. Direct Product Suppliers (Tier 1)

Our primary suppliers are reputable international manufacturers, predominantly based in Europe:

Supplier/Brand	Products	Manufacturing Location	Relationship
Blum	Hinges, drawer systems, lift systems, cabinet connectors, TIP-ON systems	Austria, Italy	Parent company, Long-term partnership
SIGE	Pull-out systems, wire ware, waste bins	Italy	Long-term partnership
Wesco	Waste management systems, bins	Germany	Long-term partnership
Furnipart	Handles, knobs, furniture hardware	China	Long-term partnership
L&S	LED lighting systems, electrical fittings	95% China and 5% Italy	Long-term partnership
Cinetto	Cabinet systems and hardware	Italy	Long-term partnership
Docking Drawer	Electrical Solutions	Mexico, China	Long-term partnership
Agoform	Cutlery trays, matting	Germany	Long-term partnership
Volpato	Vanity products	Italy	Long-term partnership
Soudal	Adhesive and silicone products	Belgium	Long-term partnership
Ambos	Wardrobe lift systems	Italy	Long-term partnership
Kia Ora	Electrical Solutions	China	Long-term partnership
King Slide	Cutlery trays, matting	Taiwan	Long-term partnership
Trading Agent	Handles, hanging rail and misc. products	Taiwan/China/Thailand	Long-term partnership
Screw supplier	Screws and fixings	Taiwan	Long-term partnership
Armstrong Locks	Locks and accessories	Taiwan/China	Long-term partnership
Trading Agent	Handles, shelf supports, legs and misc. products	China	Long-term partnership
Trading Agent	Trading agent for rail products	Taiwan	Long-term partnership
Trading Agent	Trading agents for rail products, brackets, and misc. products	China	Long-term partnership
Manufacturer	Safes, mirrors, track systems, kitchen accessories and ball bearing slides	China	Long-term partnership
Manufacturer	Hanging rail components and lighting components	China	Long-term partnership
Trading Agent	Trading agent Hinges, catches and other fittings	China	Long-term partnership

## Supply Chain Characteristics



### Total annual spend:

Approximately AUD \$65 million across all suppliers



### Long-term relationships:

Over 80% of our suppliers have been engaged for 5+ years



### Number of direct suppliers:

Approximately 30-40 active product suppliers, services suppliers will be evaluated and measured in future years – in accordance with our future improvement plans.



### Primarily single-tier product structure:

95% of finished products are imported directly from manufacturers, with 5% imported through trading agents.



### Geographic spread:

Primarily Europe (60%), Australia (30%), Asia (10%)

# Risks of Modern Slavery

Wilson & Bradley is committed to identifying and understanding modern slavery risks within our operations and throughout our supply chain.

We recognise that modern slavery encompasses serious forms of exploitation including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, deceptive recruiting, and child labour.

## Risk Assessment Within Our Operations

### Inherent Modern Slavery Risk in Our Operations:

Risk Area	Inherent Risk Level	Risk Factors	Specific Risk Types
Direct employees (Australia)	Low	<ul style="list-style-type: none"><li>• Strong employment laws</li><li>• Direct employment only</li><li>• No labour hire agencies used</li><li>• Regulated workplace conditions</li></ul>	<ul style="list-style-type: none"><li>• Working hours</li><li>• Wages and entitlements</li><li>• Freedom of association</li></ul>
Cleaning contractors	Medium	<ul style="list-style-type: none"><li>• Contract workers</li><li>• Potentially low-skilled labour</li><li>• May include migrant workers</li></ul>	<ul style="list-style-type: none"><li>• Underpayment</li><li>• Excessive working hours</li><li>• Deceptive recruiting</li></ul>
Transport and logistics	Medium	<ul style="list-style-type: none"><li>• Long working hours</li><li>• Subcontracting practices</li><li>• Driver employment arrangements</li><li>• Labour hire agency oversight</li><li>• Short-term contractors</li></ul>	<ul style="list-style-type: none"><li>• Forced labour</li><li>• Debt bondage</li><li>• Working hours</li></ul>
Facilities maintenance	Low-Medium	<ul style="list-style-type: none"><li>• Specialised trades</li><li>• Professional services</li><li>• Highly regulated</li><li>• Established firms</li></ul>	<ul style="list-style-type: none"><li>• Regular employment</li><li>• Working conditions</li></ul>
IT and professional services	Medium	<ul style="list-style-type: none"><li>• Distribution, Showroom</li></ul>	<ul style="list-style-type: none"><li>• Minimal risk</li></ul>

### Assessment Summary

The overall inherent risk of modern slavery within our **direct operations in Australia is assessed as LOW.**

This assessment is based on:

- All employees are directly employed under Australian employment law
- Strong regulatory framework and workplace protections in Australia
- Transparent recruitment and onboarding processes
- Fair wages above minimum wage requirements
- Clear workplace policies and grievance and complaint mechanisms

However, we recognise **MEDIUM risk** exists with certain service providers, particularly:

- Cleaning and janitorial services
- Labour hire agencies
- Transport and freight services (domestic)
- Some maintenance contractors

These service providers may engage vulnerable workers or use subcontracting arrangements that reduce our visibility into employment practices.

# Risk Assessment Throughout Our Supply Chain

Modern slavery risks are more significant in our international supply chain due to the complexity of multi-tier sourcing, geographic locations, and the nature of manufacturing processes involved in hardware production.

## Risk Assessment by Supply Chain Category:

### 1. Direct Product Suppliers (Finished Hardware Products)

Product Category	Manufacturing Location	Inherent Risk Level	Key Risk Factors	Specific Risk Types
Blum products (hinges, drawer systems)	Austria, Italy	Low-Medium	<ul style="list-style-type: none"> <li>Manufacturing facilities in Europe</li> <li>Complex production processes</li> <li>Tier 2+ raw material sourcing</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Freedom of association</li> </ul>
SIGE products (wire ware, bins)	Italy	Low-Medium	<ul style="list-style-type: none"> <li>European manufacturing</li> <li>Metal fabrication processes</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Regular employment</li> </ul>
Wesco products (waste systems)	Germany	Low-Medium	<ul style="list-style-type: none"> <li>European manufacturing</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Supply chain transparency</li> </ul>
Furnipart handles (handles)	China	High	<ul style="list-style-type: none"> <li>Local Labour laws</li> <li>Metal finishing processes</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> </ul>
L&S lighting systems (lighting)	China, Italy	Medium-High	<ul style="list-style-type: none"> <li>Electronic components</li> <li>Assembly processes</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Tier 2+ electronics sourcing</li> </ul>
Cinetto Sliding Systems (track systems)	Italy	Low-Medium	<ul style="list-style-type: none"> <li>European manufacturing</li> <li>Metal fabrication processes</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Regular employment</li> </ul>
Docking Drawer (electrical products)	Mexico/China	High	<ul style="list-style-type: none"> <li>Local Labour laws</li> <li>Metal finishing processes</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> </ul>
Agoform (cutlery trays and matting)	Germany	Low-Medium	<ul style="list-style-type: none"> <li>European manufacturing</li> <li>Plastic and metal components</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Supply chain transparency</li> </ul>
Volpato (vanity products)	Italy	Low-Medium	<ul style="list-style-type: none"> <li>European manufacturing</li> <li>Metal fabrication processes</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Regular employment</li> </ul>
Soudal (adhesives and silicones)	Belgium	Low-Medium	<ul style="list-style-type: none"> <li>European manufacturing</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Regular employment</li> </ul>
Ambos (lift systems)	Italy	Low-Medium	<ul style="list-style-type: none"> <li>European manufacturing</li> <li>Metal fabrication processes</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Regular employment</li> </ul>
Kia Ora #1 (Bins, laundry and cutlery trays)	China	High	<ul style="list-style-type: none"> <li>Local labour laws</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Supply chain transparency</li> </ul>
King Slide (ball bearing slides)	Taiwan	High	<ul style="list-style-type: none"> <li>Local labour laws</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Supply chain transparency</li> </ul>

## 1. Direct Product Suppliers (Finished Hardware Products) Cont.

Product Category	Manufacturing Location	Inherent Risk Level	Key Risk Factors	Specific Risk Types
Trading Agent (Taiwan #1) (rails, handles, misc. products)	Taiwan/China/Thailand	High	<ul style="list-style-type: none"> <li>Local labour laws</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Supply chain transparency</li> </ul>
Screw manufacturer (screws)	Taiwan	High	<ul style="list-style-type: none"> <li>Local labour laws</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Supply chain transparency</li> </ul>
Armstrong Locks (locks)	Taiwan/China	High	<ul style="list-style-type: none"> <li>Local labour laws</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Supply chain transparency</li> </ul>
Trading Agent China #1 (handles, shelf supports, legs and misc. products)	China	High	<ul style="list-style-type: none"> <li>Local labour laws</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Supply chain transparency</li> </ul>
Trading Agent Taiwan #2 (rail products)	Taiwan	High	<ul style="list-style-type: none"> <li>Local labour laws</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Supply chain transparency</li> </ul>
Trading Agent China #2 (rail products, brackets, and misc. products)	China	High	<ul style="list-style-type: none"> <li>Local labour laws</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Supply chain transparency</li> </ul>
Kia Ora #2 (Safes, mirrors, track systems, kitchen accessories and ball bearing slides)	China	High	<ul style="list-style-type: none"> <li>Local labour laws</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Supply chain transparency</li> </ul>
Manufacturer China (hanging rail components and lighting components)	China	High	<ul style="list-style-type: none"> <li>Local labour laws</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Supply chain transparency</li> </ul>
Trading Agent China #3 (Hinges, catches and other fittings)	China	High	<ul style="list-style-type: none"> <li>Local labour laws</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Supply chain transparency</li> </ul>
Yorozunet (edge trimmers and tools)	Japan	High	<ul style="list-style-type: none"> <li>Local labour laws</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Health and safety</li> <li>Supply chain transparency</li> </ul>

## Raw Materials and Components (Tier 2+ Supply Chain)

Material Category	Likely Source Regions	Inherent Risk Level	Key Risk Factors	Specific Risk Types
Metal components (steel, aluminium, zinc)	Europe, Asia (China, India, Turkey)	Medium-High	<ul style="list-style-type: none"> <li>Mining and extraction</li> <li>Metal processing facilities</li> <li>Lower-tier suppliers</li> <li>Limited visibility</li> </ul>	<ul style="list-style-type: none"> <li>Forced labour</li> <li>Child labour</li> <li>Working hours</li> <li>Health and safety</li> <li>Debt bondage</li> </ul>
Plastic components and polymers	Europe, Asia (China, Taiwan)	Medium-High	<ul style="list-style-type: none"> <li>Petrochemical industry</li> <li>Injection moulding facilities</li> <li>Lower-tier suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Forced labour</li> <li>Working hours</li> <li>Health and safety</li> <li>Deceptive recruiting</li> </ul>
Electronic components	Asia (China, Taiwan, Korea)	High	<ul style="list-style-type: none"> <li>Electronics manufacturing</li> <li>Known high-risk sector</li> <li>Multiple production tiers</li> <li>Migrant worker use</li> </ul>	<ul style="list-style-type: none"> <li>Forced labour</li> <li>Excessive working hours</li> <li>Debt bondage</li> <li>Deceptive recruiting</li> <li>Young workers</li> <li>Health and safety</li> </ul>
Surface treatments and finishes	Europe, Asia	Medium-High	<ul style="list-style-type: none"> <li>Chemical processes</li> <li>Specialised facilities</li> </ul>	<ul style="list-style-type: none"> <li>Working hours</li> <li>Forced labour</li> </ul>



## Freight and Transportation Services

Service Type	Geographic Scope	Inherent Risk Level	Key Risk Factors	Specific Risk Types
International shipping (sea freight)	International waters, ports globally	High	<ul style="list-style-type: none"> <li>Seafarer exploitation</li> <li>Flag of convenience vessels</li> <li>Long hours at sea</li> <li>Limited oversight</li> <li>Contract arrangements</li> </ul>	<ul style="list-style-type: none"> <li>Forced labour</li> <li>Debt bondage</li> <li>Excessive working hours</li> <li>Withholding of wages</li> <li>Passport retention</li> </ul>
International air freight	International	Medium	<ul style="list-style-type: none"> <li>Airport ground handling</li> <li>Warehouse operations</li> <li>Subcontracting practices</li> </ul>	<ul style="list-style-type: none"> <li>Forced labour</li> <li>Working hours</li> <li>Deceptive recruiting</li> </ul>
Domestic road freight	Australia	Low-Medium	<ul style="list-style-type: none"> <li>Driver employment arrangements</li> <li>Subcontracting</li> <li>Working hours pressures</li> </ul>	<ul style="list-style-type: none"> <li>Forced labour</li> <li>Working hours</li> <li>Underpayment</li> </ul>

## Other Services

Service Category	Inherent Risk Level	Key Risk Factors
Packaging materials	High	<ul style="list-style-type: none"> <li>Sourcing from Asia, manufacturing processes</li> </ul>
Warehousing and storage	Low-Medium	<ul style="list-style-type: none"> <li>Australian operations, regulated environment</li> </ul>
Professional services	To be assessed	<ul style="list-style-type: none"> <li>To be assessed in future years in accordance with future improvements.</li> </ul>

## Geographic Risk Assessment:

Based on risk assessment frameworks, we have identified the following geographic risk levels in our supply chain:

Risk Level	Countries/Regions	Proportion of Supply Chain
<b>Low</b>	Australia, Austria, Germany, Italy, other Western Europe	<b>90%</b>
<b>High</b>	China, South Asia, Southeast Asia (tier 2+ suppliers)	<b>10%</b>

## Summary of Supply Chain Risks:

Our assessment identifies the following **KEY RISKS** in our supply chain:

- 1. International shipping and freight services** - particularly seafarers' rights and working conditions
- 2. Lower-tier raw material sourcing** (metals, plastics, electronics) from higher-risk countries
- 3. Limited visibility** into tier 2 and tier 3 suppliers beyond our direct relationships
- 4. Complex manufacturing supply chains** for electronic components and metal fabrication
- 5. Contract labour and subcontracting** in transport and logistics services

While our direct suppliers (tier 1) are predominantly reputable European manufacturers with their own compliance programs, we recognise that risks increase at lower tiers of the supply chain where our direct influence is more limited.

# Actions To Address Modern Slavery Risks

Wilson & Bradley has implemented a comprehensive framework to identify, assess, and address modern slavery risks. Our approach is aligned with our core company values, particularly **safety, integrity, and respect for each other** and leverages the resources and expertise available through the Blum Group.

## Governance Structure

We have established a governance structure to oversee modern slavery risk management:

Role/Function	Responsibilities
Managing Director	<ul style="list-style-type: none"> <li>• Ultimate accountability for modern slavery compliance</li> <li>• Approval of Modern Slavery Statement</li> </ul>
General Manager	<ul style="list-style-type: none"> <li>• Resource allocation for compliance activities</li> <li>• Oversight of compliance programs</li> <li>• Coordination with Blum Group compliance functions</li> </ul>
National Operations & Logistics Manager	<ul style="list-style-type: none"> <li>• Logistics supplier due diligence and assessment</li> <li>• Supply chain risk management</li> <li>• Freight and logistics provider oversight</li> </ul>
Human Resources Manager	<ul style="list-style-type: none"> <li>• Employee policies and procedures</li> <li>• Implementation of policies and procedures</li> <li>• Training program delivery</li> <li>• Grievance and complaint mechanism management</li> </ul>
Product Development Managers	<ul style="list-style-type: none"> <li>• Supplier relationship management</li> <li>• Monitoring and reporting of concerns</li> <li>• Customer and supplier engagement</li> </ul>
Leadership & Sustainability Support Officer	<ul style="list-style-type: none"> <li>• Coordination and compilation of Modern Slavery Statement</li> <li>• Coordination and compilation of Modern Slavery Questionnaire</li> <li>• Supplier auditing</li> </ul>

### Blum Group Integration:

We have established a governance structure to oversee modern slavery risk management:

- Alignment with Blum’s Code of Conduct for employees
- Support from Blum’s compliance functions
- Knowledge sharing and best practice exchange within the group

### Executive Oversight:

- **Half-yearly reviews** of modern slavery risk management activities by senior management

# Policies and Codes of Conduct

Wilson & Bradley has implemented the following policies and codes to prevent and address modern slavery:

## Wilson & Bradley Code of Conduct (Employee Code of Conduct)

The Wilson & Bradley Code of Conduct applies to all Wilson & Bradley employees and sets out expectations for ethical behaviour, including:

- Respect for human rights and dignity
- Prohibition of forced labour, child labour, and human trafficking
- Commitment to fair employment practices
- Safe and healthy working conditions
- Freedom of association and collective bargaining
- Non-discrimination and equal opportunity
- Ethical business conduct and integrity

### Implementation:

- All employees receive Code of Conduct training during onboarding
- Annual refresher training and acknowledgment required
- Code is easily accessible to all employees
- Breaches subject to disciplinary action up to and including termination

## Employee Workplace Behaviour Policies

Wilson & Bradley maintains multiple applicable policies that:

- Defines acceptable and unacceptable workplace behaviour
- Prohibits discrimination, bullying, harassment, and intimidation
- Outlines reporting mechanisms for policy violations
- Establishes investigation and remediation processes
- Protects employees from retaliation for reporting concerns

## Recruitment and Selection Policy

Our recruitment practices ensure ethical hiring:

- Right to work verification for all employees
- Age verification to prevent underage employment
- Transparent employment contracts in English
- No fees charged to employees for recruitment or employment
- No retention of identity documents or passports
- Fair wages at or above Australian minimum wage standards
- Compliance with Fair Work Act and National Employment Standards



# Management Systems and Due Diligence

## Supplier Due Diligence Process:

Wilson & Bradley has implemented a risk-based due diligence process for assessing and managing modern slavery risks among our suppliers.

### Step 1: Supplier Risk Assessment

All suppliers are assessed and categorised based on risk factors:

Risk Factor	Assessment Criteria
Industry/Sector	Manufacturing, transport, services, raw materials
Geographic location	Country risk rating (Global Slavery Index)
Product/service type	Labour intensity, complexity, known risk sectors
Annual spend	Higher spend = higher priority
Supplier size and capability	Larger, established firms = lower risk
Relationship length	New suppliers = higher scrutiny

## Risk Categories:

### High

Suppliers in high-risk sectors or geographies, new relationships, or annual spend >\$500,000

### Medium

Suppliers in medium-risk sectors or geographies, moderate spend (\$100,000-\$500,000)

### Low

Suppliers in low-risk sectors/geographies, long-term relationships, spend <\$100,000

### Step 2: Supplier Onboarding and Assessment

All suppliers are assessed and categorised based on risk factors:

#### For all suppliers:

- Basic supplier information collected (ownership, locations, workforce)

#### For medium and high-risk suppliers:

- Completion of detailed Modern Slavery Self-Assessment Questionnaire
- Questions address:
  - Company structure and operations
  - Workforce demographics and employment practices
  - Recruitment processes and fees
  - Working conditions, hours, and wages
  - Health and safety practices
  - Grievance mechanisms
  - Sub-supplier management
  - Modern slavery policies and training
  - Previous violations or investigations

### Step 3: Risk Verification and Audits

For **high-risk suppliers**, additional verification may include:

- **Desktop audits:** Review of supplier policies and relevant certifications.
- **On-site inspections:** Facility visits to observe conditions and interview workers (where feasible)

### Step 4: Ongoing Monitoring

- **Annual review** of high and medium-risk suppliers
- **Continuous monitoring** of adverse media and reports related to suppliers
- **Incident reporting system** for concerns raised by employees
- **Contract reviews** to ensure modern slavery terms remain current

## Step 5: Corrective Action and Remediation

When issues are identified:

### 1. Investigation:

Gather facts and assess severity

### 2. Engagement:

Work with supplier to understand root causes

### 3. Corrective Action Plan:

Require supplier to develop and implement improvements

### 4. Monitoring:

Track implementation and verify effectiveness

### 5. Escalation:

Suspend or terminate relationship if non-compliance persists or severe violations occur

### 6. Remediation (internal):

Ensure affected workers receive appropriate remedy (e.g., back pay, safe working conditions)

## Training and Education

Wilson & Bradley is committed to building awareness and capability to identify and address modern slavery risks.

### Employee Onboarding Training

All new employees receive training on:

- Wilson & Bradley values and Code of Conduct
- Reporting mechanisms and speak-up culture
- Individual role responsibilities

#### Delivery:

Face-to-face or e-learning during orientation

#### Frequency:

Upon commencement

#### Target audience:

All employees (100%)

### Workplace Rights and Respect Training

Training on workplace behaviour, discrimination, harassment, and bullying:

- Workplace rights under Australian law
- Respectful workplace behaviour
- Recognising and preventing discrimination and harassment
- Reporting mechanisms and protections
- Manager responsibilities for investigations

#### Delivery:

Online and face-to-face

#### Frequency:

Every year

#### Target audience:

All employees; additional training for managers

### Training Metrics (Target for 2025-2026):

Training Program	Target Audience	Target Completion Rate	Frequency
Onboarding (Code of Conduct)	All new employees	100%	Upon commencement
Modern Slavery Awareness	All employees	100%	Every 2 years
Specialist Training	Key roles (15~ staff)	100%	Every 3 years
Workplace Rights & Respect	All employees	100%	Every year

# Grievance Mechanisms

Wilson & Bradley provides multiple channels for employees to report modern slavery concerns or other ethical violations.

## Internal Reporting Channels

- **Direct supervisor or manager:** Employees can raise concerns with their immediate manager
- **Human Resources:** HR Manager available for confidential discussions
- **Managing Director or General Manager:** Open-door policy for serious concerns
- **Email hotline:** Dedicated email address for reporting concerns

## Blum Group Whistleblower Program

Wilson & Bradley participates in the Blum Group's confidential reporting system:

- **Anonymous reporting** options available
- **Multiple languages** supported
- **Protection from retaliation** for good-faith reports
- **Investigation and resolution** process managed by Blum or Wilson & Bradley compliance team
- **Feedback to reporters** (where identity is disclosed)

The Whistleblower program is promoted through:

- Information on company intranet
- Training and orientation programs
- Annual reminders to all staff

## Investigation and Response Process

When concerns are reported:

- 1. Receipt and triage:** Assess severity and urgency
- 2. Investigation:** Gather facts through interviews, document review, and site visits as needed
- 3. Assessment:** Determine if modern slavery or other policy violations occurred
- 4. Action:** Implement corrective measures, disciplinary action, or supplier remediation
- 5. Remediation:** Ensure affected individuals receive appropriate support and remedy
- 6. Prevention:** Identify root causes and implement controls to prevent recurrence
- 7. Reporting:** Document outcomes and report to relevant authorities if required
- 8. Follow-up:** Monitor effectiveness of corrective actions

## Protections for Reporters:

- No retaliation against individuals who report concerns in good faith
- Confidentiality maintained to the extent possible
- Support provided to individuals who experience or witness modern slavery

## Reporting to Authorities:

If modern slavery is identified, Wilson & Bradley will:

- Report to Australian Federal Police (AFP) via the Australian Centre to Counter Child Exploitation (ACCCE) or Crime Stoppers
- Cooperate fully with law enforcement investigations
- Support victims in accessing services and protection

# Assessing Effectiveness

Wilson & Bradley is committed to continuously improving our approach to combating modern slavery. We assess the effectiveness of our actions through metrics, reviews, and feedback mechanisms.

## Governance and Oversight

### Effectiveness Measures:

Measure	Target	2024-2025 Performance	Status
Half yearly executive reviews conducted	2 per year	2 completed	- NA
Annual reporting to Blum Group	1 per year	0 completed	- NA
Modern Slavery Statement published	Annually	Published October 2025	- NA
Management approval of statement	100%	Approved by Managing Director	- NA

### Future Improvements:

- Establish formal Modern Slavery Working Group with representatives from operations, HR, procurement, and finance (2025-2026)
- Engage independent third-party audit of modern slavery controls (way down the line)

## Policy Implementation

### Effectiveness Measures:

Policy/Program	Target	2024-2025 Performance	Status
Employees acknowledged Code of Conduct	100%	100%	✓ Achieved
High-risk suppliers accepted Supplier Code	90%	100%	✓ Achieved
Workplace Behaviour Policies communicated	100% of employees	100%	✓ Achieved
Recruitment policy compliance	100% of new hires	100%	✓ Achieved

### Assessment:

- Strong compliance with internal policies for directly employed staff
- No instances of non-compliant recruitment practices identified

### Future Improvements:

- Complete Supplier Code acceptance for high-risk suppliers (2025)
- Implement formal Sustainable Procurement Policy (2025)
- Review and update policies annually to reflect best practices

# Supplier Management

## Effectiveness Measures:

Supplier Due Diligence (2024-2025 Reporting Period):

Metric	Target	Performance	Status
High-risk suppliers identified	100%	11 high-risk suppliers identified	✓ Achieved
Medium-risk suppliers identified	100%	5 medium-risk suppliers identified	✓ Achieved
Low-risk suppliers identified	100%	43 low-risk suppliers identified	✓ Achieved
High-risk suppliers completed questionnaire	90%	11 of 11 (100%)	✓ Achieved
Medium-risk suppliers completed questionnaire	90%	5 of 5 (100%)	✓ Achieved
Low-risk suppliers identified	90%	26 of 43 (63.4%)	↗ On track
Desktop audits completed (high-risk)	As required	0 desktop audits	✓ Achieved
On-site audits/inspections completed	As required	0 on-site audits	✓ Achieved
Corrective actions issued	As required	0 corrective action plans issued	✓ Achieved
Suppliers terminated due to non-compliance	0 (preferred outcome)	0 terminations	✓ Achieved

## Key Findings:

# 100%

response rate from high-risk suppliers to questionnaires (goal: 90%)

# 0

desktop audits conducted for international freight providers

# 0

corrective action plans issued

# 0

severe violations or modern slavery incidents identified

## Strong engagement

from tier 1 product suppliers (Blum, SIGE, Wesco) with established compliance programs

## Blum Group Supplier Audits:

- Wilson & Bradley benefits from **Blum's annual supplier audit program**
- Blum conducted audits of key manufacturing suppliers in Europe
- No significant modern slavery risks identified in Blum audits
- Continuous improvement recommendations implemented by suppliers

## Challenges:

- Limited visibility into tier 2 and tier 3 suppliers (raw materials)

## Future Improvements:

- Increase supplier questionnaire response rates
- Implement supplier engagement program with education and support resources
- Collaborate with Blum Group to extend visibility into tier 2 suppliers
- Conduct at least 2 on-site supplier audits per year (when feasible)
- Develop supplier performance scorecards including modern slavery compliance

# Training and Awareness

## Effectiveness Measures:

Training Completion (2024-2025 Reporting Period):

Training Program	Target Audience	Target	Completion Rate	Status
Onboarding (Code of Conduct)	All new employees	100%	100%	✓ Achieved
Workplace Rights & Respect	All employees	100%	100%	✓ Achieved

## Assessment:

- **100% completion** of onboarding training for new hires demonstrates strong initial engagement

## Future Improvements:

- Achieve 100% completion rates for all training programs by end of financial year 2025-2026
- Implement automated reminders and tracking for training assignments
- Develop refreshed training content with Australian cabinet hardware industry examples
- Measure knowledge retention through post-training assessments

## Grievance Mechanism Usage:

Metric	2024-2025 Performance
Modern slavery-related reports received	0
Reports investigated	0
Retaliation incidents	0

## Assessment:

- **Zero modern slavery reports** may indicate either effective controls or potential underreporting
- Regular promotion of grievance mechanisms continues
- Feedback suggests employees are aware of reporting options but may benefit from more examples of reportable concerns

## Future Improvements:

- Enhance promotion of grievance mechanisms through case studies and examples
- Provide regular “Whistleblower” reminders and anonymous feedback options
- Track grievance mechanism awareness through employee surveys

# Consultation Process

Wilson & Bradley does not own or control any other entities. However, as part of the Blum Group, we engage in ongoing consultation and collaboration to strengthen our approach to modern slavery.

## Internal Consultation

This Modern Slavery Statement was developed through consultation with:

- **Managing Director:** Overall strategy and approval
- **General Manager:** Policy development and implementation oversight
- **National Operations & Logistics Manager:** Supply chain risk assessment and supplier engagement
- **HR Manager:** Employee policies, training programs, and grievance mechanisms
- **National Sales Manager:** and customer engagement
- **Finance Manager:** Supplier spend analysis and risk prioritisation
- **Product Development Managers:** Supplier relationships
- **Leadership Support Officer:** Policy development and implementation oversight

## Consultation Process

- **Workshops and meetings** to identify risks and review existing controls
- **Feedback on draft policies** and procedures from key stakeholders
- **Review of draft statement** by leadership team prior to approval
- **Communication plan** to share statement with all employees

**Half annual meetings** are held between Wilson & Bradley leadership and Blum Group representatives to discuss:

- Modern slavery compliance status
- Supplier risk assessments and audit findings
- Training and awareness programs
- Emerging risks and legislative changes
- Continuous improvement initiatives

## External Consultation

Wilson & Bradley engages with external stakeholders to inform our approach:

- **Suppliers:** Direct engagement on modern slavery expectations and support
- **Customers:** Responding to customer due diligence requests and sharing our commitment
- **Government guidance**



# Future Commitments

Wilson & Bradley is committed to continuous improvement in our efforts to combat modern slavery. Our commitments for the next reporting period (2025-2026) and beyond include:

## Year 1 (2025-2026)

### Supply Chain:

Scope and Survey Indirect Goods and Services Suppliers (Tier 1)

Category	Services Provided	Geographic Location
Warehousing	Storage, inventory management	Australia
IT services	E-commerce platform, systems support, network management	Australia
Professional services	Legal, accounting, consulting, auditing	Australia
Facilities management	Cleaning, maintenance, security, waste management	Australia (local to each site)
Equipment servicing	Forklift maintenance, warehouse equipment	Australia
Marketing services	Digital marketing, advertising, graphic design	Australia
Office supplies	Stationery, printing, consumables	Australia
Utilities	Electricity, water, telecommunications	Australia

Scope and survey our tier 1 suppliers' source raw materials and components from global supply chains, including:

- Metal components (steel, aluminium, zinc alloys, brass)
- Plastic components and polymers
- Electronic components for lighting and automated systems
- Packaging materials
- Adhesives and surface treatments

### Governance:

- Establish a formal Modern Slavery Working Group with quarterly meetings
- Develop KPI dashboard for real-time monitoring of compliance metrics
- Complete annual review of Modern Slavery Statement with stakeholder consultation

### Policies:

- Provide suppliers access to Blum's Supplier Code of Conduct
- Create Wilson & Bradley Supplier Code of Conduct and ensure supplier acceptance
- Create Wilson & Bradley Modern Slavery Policy and ensure supplier acceptance
- Train employees internally on Blum's Supplier Code of Conduct
- Implement formal Sustainable Procurement Policy
- Complete Supplier Code acceptance for 100% of high-risk suppliers
- Review and update all policies to reflect evolving best practices

### Due Diligence:

- Conduct a comprehensive risk assessment of our Australian operations using recognised risk assessment methodologies
- Achieve 95% questionnaire response rate from high-risk suppliers
- Achieve 85% questionnaire response rate from medium-risk suppliers
- Conduct at least 2 on-site supplier audits (if feasible)
- Complete desktop audits for all new high-risk suppliers
- Extend due diligence to additional medium-risk service providers

### Training:

- Achieve 90%+ completion rates for all training programs
- Develop refreshed training content with industry-specific examples
- Conduct supplier education sessions on modern slavery expectations

### Grievance Mechanisms:

- Enhance promotion of Whistleblower program with regular reminders and examples
- Conduct employee survey on grievance mechanism awareness

## Year 2 (2026-2027)

### **Governance:**

- Include Freight and Logistics in ongoing audits and reviews – targeting high risk areas (international freight, domestic freight)
- Engage independent third-party audit of modern slavery risk management system
- Implement recommendations from third-party audit
- Expand reporting metrics and transparency

### **Supply Chain:**

- Develop supplier performance scorecards including modern slavery compliance
- Collaborate with Blum Group to extend visibility into tier 2 suppliers (raw materials)
- Implement risk-based approach to lower-tier supplier assessment
- Increase frequency of high-risk supplier reviews to every 6 months

### **Training:**

- Introduce Modern Slavery Awareness training for all employees
- Introduce Modern Slavery Specialist training for governing/targeted audiences
- Digital posters in Wilson & Bradley locations highlighting modern slavery

### **Technology:**

- Explore supply chain mapping and transparency technology solutions
- Implement digital supplier management platform for streamlined due diligence

## Year 3+ (2027 onwards)

### **Supply Chain Transparency:**

- Achieve comprehensive mapping of tier 2 suppliers for critical raw materials
- Implement technology solutions for supply chain traceability
- Develop collaborative industry initiatives for supply chain transparency

### **Training:**

- Introduce annual refresher briefings for all staff (in addition to 2-year formal training)
- Implement post-training assessments to measure knowledge retention
- Develop case study library of modern slavery risks specific to cabinet hardware industry

### **Industry Leadership:**

- Regular communication with key suppliers on modern slavery expectations
- Sharing of resources and best practices
- Participation in industry forums and supplier days
- Collaboration with Blum Group on supplier capability building
- Share learnings and best practices with industry peers
- Participate in industry working groups on ethical sourcing
- Support supplier capability building programs

### **Continuous Improvement:**

- Regularly review and update risk assessment methodologies
- Adapt to emerging risks and legislative changes
- Strengthen integration with Blum Group global programs



# Approval

This Modern Slavery Statement was approved by the Board of Directors of Wilson & Bradley Pty Ltd on 22 December 2025 for the financial year ending 30 June 2025.

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) and covers the mandatory reporting criteria specified in section 16 of the Act.

Wilson & Bradley acknowledges the importance of addressing modern slavery risks in our operations and supply chains. We are committed to taking all reasonable steps to prevent, identify, and remediate modern slavery in our business.

We welcome feedback on this statement and our approach to combating modern slavery.

Wilson & Bradley Pty Ltd

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Rod Pearse  
Managing Director  
Wilson & Bradley Pty Ltd

ABN 56 630 675 375  
Date: 22/12/2025

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&bradley  
The Perfect Fit

## Mandatory Reporting Criteria Cross-Reference:

<b>Criteria</b>	<b>Modern Slavery Act 2018 (Cth) Requirement</b>	<b>Section in This Statement</b>
1	Identify the reporting entity	Section 1 (Introduction), Section 2A (Our Structure)
2	Describe structure, operations, and supply chain	Section 2 (About Wilson & Bradley)
3	Describe risks of modern slavery practices	Section 3 (Risks of Modern Slavery)
4	Describe actions taken to assess and address risks	Section 4 (Actions to Address Modern Slavery Risks)
5	Describe how effectiveness is assessed	Section 5 (Assessing Effectiveness)
6	Describe consultation process	Section 6 (Consultation Process)
7	Other relevant information	Sections 1, 7 (Future Commitments)



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