



tiles | stone | timber

2023

Modern Slavery Statement

National Tiles Co Pty Ltd
ACN 007 381 599

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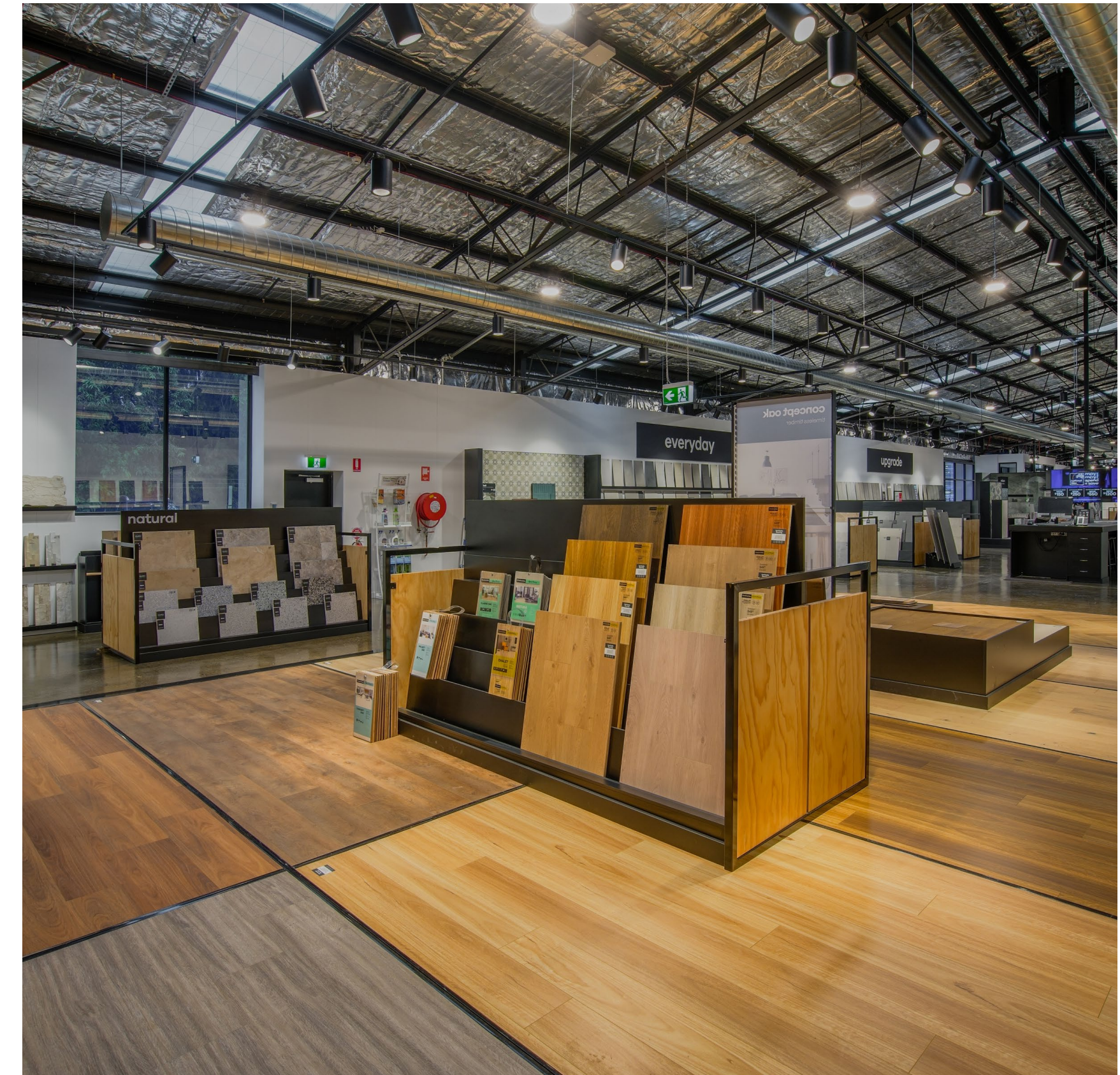
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Modern Slavery Statement

National Tiles seeks to engage fairly with suppliers, to source product ethically and sustainably and to advance the understanding and respect for human rights in our operations and supply chains. We have an established Corporate Social Responsibility Committee and report our progress to The Board of National Tiles. Through our actions and in cooperation with our suppliers, we can together reduce the risk of modern slavery.

Modern slavery is a term used to cover a range of serious exploitation practices including human trafficking, slavery, forced labour, child labour and slavery like practices. It can take the form of ownership, debt bondage, servitude, forced and compulsory labour, human trafficking and child labour.

Child labour, whilst not always illegal in the jurisdiction in which it takes place, involves the employment of children which is exploitative or is likely to harm the health, safety or morals of children. For the purpose of this policy, a child is anyone who is less than 15 years of age. Forced labour is the extraction of labour or services from any person, whom because of the use of coercion, threat, or deception, does not offer himself or herself voluntarily.

This Modern Slavery Statement is made as a joint statement in accordance with the Australian Modern Slavery Act 2018 (MSA), prepared for National Tiles Co Pty Ltd (ACN 007 381 599) as well as its wholly owned subsidiary Bargain Tiles Pty Ltd (ACN 005 535 731), including information related to the risks of modern slavery identified and actions taken for the financial year ending 30 June 2023. In preparation of this joint statement Bargain Tiles, as a company owned and controlled by National Tiles, was consulted, and assisted in the development of this statement.

This Modern Slavery Statement summarises steps taken by National Tiles to identify, prevent, mitigate, and manage the risk of modern slavery in our operations and supply chains. We recognise that modern slavery rarely occurs in isolation. It forms part of other complex challenges and systems, including gender and racial discrimination, weak rule of law and low wages. National Tiles is at the beginning of it's journey to work in collaboration with industry wide initiatives and with our suppliers to drive impact in tackling complex modern slavery issues.





01.

Structure

Our structure, operations and supply chains

Our structure, operations and supply chains

National Tiles has been in operation since 1979 as a family-owned business, selling tiles, stone, timber flooring and associated trade products, along with installation services utilising subcontractors. The Group employs almost 500 team members in Australia and has almost 120 suppliers producing goods in over 8 countries. We pride ourselves on the longevity of our supplier relationships that are essential in the long-term success of the National Tiles business.

The retail network currently operates from 44 stores across VIC, SA, NSW, QLD & TAS. Retail stores are predominantly company owned along with a 12 store Franchise network in regional areas. The Franchise network is structured under Bargain Tiles, however, operationally is managed through National Tiles which essentially wholesales product to the Franchisee network. National Tiles also service builder and commercial clients from within the retail showrooms as well as from specialised design centres or operating directly from the builders selection centres.

Inventory is sourced from both local and international suppliers, either direct from manufacturers, via agents or via resellers. Inventory is then generally delivered to and stored within distribution centres in each state in which we operate as well as within retail stores before being collected by or delivered to our customers.

Additional to inventory requirements, a variety of other items are purchased to assist in the general business operations. This consists of items such as office supplies, warehousing equipment and showroom displays.

Subcontractor services are sourced, predominantly from within Australia, and mainly to service the businesses installation requirements. In addition, service companies are regularly utilised to enable a variety of tasks, such as cleaning, store maintenance or waste removal.

**40+ stores
australia
wide**

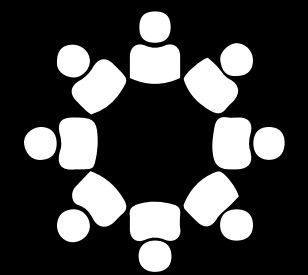


**100+
suppliers**

With over 100 suppliers operating across more than 8 countries, we take pride in fostering enduring relationships vital for the sustained success of the National Tiles business.

**475+ team
members**

National Tiles employs over 475 dedicated team members in Australia, showcasing a strong commitment to a collaborative and proficient work environment.





02.

Risks

Primary areas of modern slavery risk

Risk Identification

National Tiles have identified and categorised various areas of risk of modern slavery practices within its operations and supply chain.

The primary areas of modern slavery risk, including our assessment of the levels of risk within and between each area are identified below.

Purchase of Inventory

Inventory is being purchased from Australia, Asia and Europe. Purchases are made directly from manufacturers, through agents and from wholesalers. We believe the highest level of risk stems from purchases of product manufactured in Asia, which includes purchases direct from the manufacturer as well as via agents or wholesalers. Our next level of risk stems from the European markets, followed by the local market. Further classification and analysis is being undertaken at an individual factory level. We have recently commenced factory audits in China through QIMA, and have plans in place to undertake factory audits in Europe and India in the coming months.

Subcontractor services

Product installation services are being undertaken within Australia by subcontractors. Some administrative functions are also undertaken by subcontractors located within Asia. We have identified that a moderate risk level exists in the area of subcontractors.

Consumable and Capital Suppliers

All the usual business consumable requirements, such as office supplies, packaging materials and uniforms, as well as capital requirements, such as IT equipment or showroom fit-outs, are purchased primarily from local manufacturers and resellers. Primary risks here are from re-sellers who source their product from overseas factories.

Service Providers

A range of services are provided within the operations. These range from cleaning services to freight and logistics providers to provision of marketing services.

Internal Employment Practices

Our internal employment practices are under regular review to ensure we uphold as a minimum each of the standards required under the various Australian laws and regulations.

Labour Hire

Some labour hire services are utilised, generally to assist with peak warehousing requirements. The potential exists that the labour hire company is not following minimum standards required with their employment practices, although we believe this to be a low risk.

Franchise Network

As part of our network, we must work with each of our Franchisee's to ensure they are also following minimum standards and dealing with appropriate suppliers and service providers. Additionally, we need to ensure that each of our Franchisee's are meeting each of their employment practice requirements.



03

Actions

Addressing and Managing Modern Slavery Risks

Actions Taken to Assess and Address Risks of Modern Slavery

For many years we have also had our Whistle-Blower Protection Policy to promote a culture of compliance, honesty and ethical behaviour within National Tiles. We encourage staff to report any “wrong-doing” such as dishonest, illegal or inappropriate activities in good faith and in an environment free from retribution so that the Board and Senior Management can adequately investigate and manage risk and cultural issues within National Tiles.

We have also developed an Ethical Sourcing Policy to ensure we are:

- sourcing products in a responsible manner
- working with our suppliers to improve their social and environmental practices
- providing clear guidance to our buying staff, and
- protecting our corporate reputation, the reputation of our individual businesses and brands.

A modern Slavery Policy has been developed to outline National Tiles’ commitment to minimising the risk of modern slavery occurring within its own business, supply chains or through other business relationship and to ensure we will only conduct business with organisations which fully comply with this policy or are actively working to meet this minimum level of standards.

For over 30 years, both the company owner and key executives have been visiting our supply partners and factories throughout Australia, Asia and Europe. This has provided regular opportunities to site any concerning activities and to work with our supply chain to make ongoing incremental improvements as needed.

Whilst the impacts of COVID-19 did reduce the opportunity to visit supply partners in person, we have recently visited a number of the factories in Europe and China that we utilise and have been paying extra attention to potentially risk practices on site and engaging in factory audits with QIMA.

A Modern Slavery Committee which includes our CEO and a number of key members of the Executive Team, continue to meet quarterly to ensure ongoing progress is made to strengthen our commitment towards the elimination of Modern Slavery. It is responsible for the setting of strategy in relation to modern slavery, assessing progress and addressing feedback. Over time, this committee will be able to track progress made by each of our direct suppliers and manufacturers based on annual reporting feedback. Any critical concerns will be reported to the board as required, with as a minimum an annual report back to the board to provide a statement of progress and deliverables. The Committee has recently appointed an independent audit firm to assist with conducting factory audits, initially with our highest risk factories.



04.

Effectiveness

Assessment of the effectiveness of actions being taken

Assessment of the effectiveness of actions being taken

During this reporting period our focus has been around developing and implementing a robust audit process to identify modern slavery risks. We will be monitoring the effectiveness of any processes and procedures adopted to address the risks that our business is exposed to, in line with the UN Guiding Principles. We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and external assurance processes. Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery.

Specific action items completed include:

- Creation of an introductory letter from our CEO and Supplier Code of Conduct for distribution to our direct suppliers, wholesalers and agents.
- Commenced process to obtain signoff for Supplier Code of Conduct by the senior management of our direct suppliers, wholesalers and agents.
- Appointed QIMA as our independent auditor
- Together with QIMA developed a self-assessment audit that will be used to identify high risk suppliers.
- Commenced development of reporting to measure compliance with our Supplier Code of Conduct.





05

Other Relevant Information

How we have consulted our business

Other Relevant Information

We are committed to ensuring we comply with relevant legislation (Modern Slavery Act 2018 (Cth)), appropriate standards & reporting requirements, codes of practice and other guidance material and act in accordance with the expectations of our customers and the community, and we expect the same from our suppliers.

Maintaining a reputation for the highest legal, moral, and ethical standards in our dealings with our customers and other key stakeholders is critical for our ongoing success. Policies that support National Tiles day to day operations are designed to make sure all relevant universally recognised human rights are safeguarded.

Our company policies have been developed to complement our core values of respect, teamwork, customer commitment, relentless improvement and innovation.

We are committed to working with our suppliers to help them support the ethical standards set out in our Modern Slavery Policy and improve their standards and codes of practices to meet community expectations and minimise the risk of modern slavery in our business or supply chains.

National Tiles recognise we must take further steps to identify and address any actual or potential adverse impact with which we may be involved whether directly or indirectly through our own activities or business relationships.

We commit to undertake the following actions;

1. Have a Zero tolerance approach to modern slavery in any part of our operations and facilities as well as the operations and facilities of our suppliers and business partners.
2. Prohibit exploitation of children through their engagement in hazardous work and the punishment, abuse or involuntary servitude of any worker.
3. Support temporary workplace internship and apprenticeship education programs for younger persons as well as customary seasonal employment so long as such person are closely supervised, the work is of short duration and their morals, safety, health and compulsory education are not compromised in any way.
4. Restrict work tasks for any person under the age of 18 to non-hazardous activities, including but not limited to work which exposes them to a possibility of physical

or psychological abuse; work underground or at dangerous heights; work with dangerous equipment; work in an unhealthy environment; and work under particularly difficult conditions.

5. Verify the age of applicants to ensure compliance with child labour legislation and our own policy.
6. Perform risk assessments on suppliers and business partners to understand the measures they have in place to ensure modern slavery is not occurring in their business.
7. Request that suppliers and business partners hold their suppliers and business partners to the same standards.

National Tiles provides this Modern Slavery Statement after consultation with the companies Executive Team and approval from the companies Board of Directors on 19/12/2023.



Campbell Stott

CEO and Managing Director
National Tiles Co Pty Ltd
19/12/2023