

TradeTools

Seriously Better

Modern Slavery Statement 2024



The TradeTools Group

Founded in 1987 and headquartered on the Gold Coast, TradeTools is a successful and progressive, privately owned Queensland company. We have a long and proud history of providing the best industrial tools and equipment to tradespeople, apprentices, businesses, and industries—those who form the backbone of Australia.

We are a close-knit company with a network of industrial tool stores throughout Queensland and Northern New South Wales, e-commerce sales channels, manufacturing facilities, repair and servicing departments, warehousing and distribution, freight and logistics teams, and an importing and wholesale division. All of this is supported by over 280 dedicated people who help us proudly claim the title of Australia's best industrial tools and equipment company.

This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth), outlines the actions taken by the TradeTools Group to address modern slavery risks in our business and supply chain during the 1st January 2024 to 31st December 2024.

This statement is submitted as a joint declaration on behalf of all entities within the TradeTools Group. In this statement, we:

- 1. Identify the reporting entity and any other included reporting entities,*
- 2. Describe our structure, operations, and supply chain,*
- 3. Comment on the risks of Modern Slave Labour within supply chains,*
- 4. Describe the actions taken to assess and address these risks,*
- 5. Describe how we assess effectiveness of actions taken, and*
- 6. Comment on the consultation processes taken for group entities covered in this statement.*
- 7. Provide any other relevant information.*

The TradeTools Group is opposed to slavery in all forms.

Governance

The Board of Directors is comprised solely of Executive Directors, each with operational responsibilities, and our founding Chairman.

The TradeTools board, and the boards and directors of Group subsidiaries have the commitment and oversight of the TradeTools Groups' entities and subsequently, its approach and response to Modern Slavery risk management within the group.



Group Structure and Operations

The TradeTools Group

For the purpose of this report, TradeTools, ToolBrokers, and TradeTools' manufacturing operations are referred to as The TradeTools Group, Group, Group Operations, we, us, or our. The TT Diner has not been included in this report.

TradeTools Group Suppliers

The TradeTools Group takes great care in selecting the nearly 3,000 registered and approved factories, resellers, agents, distributors, service providers, partners, and individual contractors with whom we work.

Our core values—providing the best quality service, range, advice, and equipment at the best prices, while upholding fairness and equity—demand a disciplined approach. We are committed to partnering only with manufacturers, distributors, wholesalers, and service providers who share our dedication to these principles.

With few exceptions, the TradeTools Group does not own or operate the factories where the products we sell are manufactured. Instead, third-party suppliers, both in Australia and overseas, manufacture, distribute, or re-sell the products and services offered through our Group companies.

Certain Renegade Industrial Air Compressors and petrol equipment are assembled at the Group's Gold Coast facilities from components sourced both locally and internationally. Additionally, some products are manufactured from locally sourced raw steel components.

Where locally manufactured Air Compressors or other items incorporate internationally sourced components, the suppliers of these components undergo our rigorous risk assessment and management processes.



Risks of Modern Slavery in Operations and Supply Chains

All products and services carry some level of risk of modern slavery within their supply chains.

The products acquired and re-sold by the TradeTools Group, as well as the service partners we engage with, are sourced from around the world. Each supplier and region is subject to varying levels of modern slavery risk within their respective supply chains.

Over 91% of our Group's suppliers are based in Australia, with 7.2% based in China, 1.2% in Taiwan, and the remaining suppliers located in countries such as the United States, India, and Europe.

The TradeTools Group has conducted assessments to identify regions and suppliers that present heightened risks of modern slavery.

Modern slavery risks are higher in China and India, while Australia, Europe, Taiwan, and the United States present reduced risks within their respective supply chains.

In accordance with the Australian Modern Slavery Act 2018 (Cth), modern slavery is defined as involving eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour, where children are subjected to slavery or similar practices, or engaged in hazardous work.

Additional risks we consider include:

- Poor working conditions*
- Ineffective health and safety management*
- Excessive working hours*
- Unpaid work*
- Child labour*
- Persecution based on gender, religion, ethnicity, social background, or caste.*

Very Low Risk of Modern Slavery in TradeTools Group and Australian Suppliers

The risk of modern slavery within the TradeTools Group and our Australian suppliers has been assessed as very low.

TradeTools Group employees, along with the Australian-based employees of our suppliers, are covered by industrial relations legislation, modern awards, and employment contracts. These legal frameworks, in conjunction with state and national regulators, play a key role in identifying, managing, and protecting workers from modern slavery within Australia.

Additionally, our recruitment and employment practices routinely assess prospective employees' eligibility and right to work. We also have policies in place to monitor and report any breaches.

The TradeTools Group has established and communicated policies that address various aspects of human and labour rights. We have implemented procedures that allow employees to raise concerns and grievances regarding these matters.

While we have assessed the risk of modern slavery within Australia as very low, we acknowledge that there may still be risks within the extended supply chains of our Australian suppliers.

Very Low to Moderate Risk of Modern Slavery in International Suppliers

During the 2024 fiscal year, TradeTools Group had 173 active suppliers and service providers based in Asia, India, Europe, and the United States.

It is important to note that not all registered suppliers were engaged for products or services during the reporting period.

Suppliers within these regions were assessed as having varying levels of risk, categorized as very low, low, or moderate, in terms of modern slavery within their supply chains.

We have assessed our European and U.S.-based suppliers as having very low risks of modern slavery.

The Chinese electronics manufacturing sector—particularly manufacturers of phones and computer goods—has documented risks related to modern slavery. However, TradeTools does not directly source these goods from manufacturers. Instead, we procure telecommunication devices from Australian-based suppliers.

We acknowledge that some level of risk of modern slavery exists within the factories and partners we engage with. Factory inspections, long-standing relationships, supply agreements, and criminal liability for forced labour under Section 244 of the Chinese Criminal Code lead us to assess the risk of modern slavery with our Chinese partners who do not produce electronic equipment as low, and a low to moderate risk for those who do manufacture electronic equipment.

We also note that tracing modern slavery risks to the source of raw materials used in the manufacture of electronic components is not currently feasible.

The Global Slavery Index indicates that bonded labour remains prevalent within sectors such as granite quarries, agriculture, textiles, and others within India.

While the TradeTools Group does not directly source products or services from suppliers within these high-risk sectors, we acknowledge that extended supply chains do pose some level of modern slavery risk. Depending on the nature of the product, low to moderate risks of modern slavery may exist within our extended supply chains.



Assessing and Managing the Risks of Modern Slavery Within Group Supply Chains.

The TradeTools Group has long-standing relationships and supply agreements with the majority of our suppliers. In many cases, especially in China and Taiwan, these trusted partnerships have been developed over more than 30 years.

TradeTools Group directors, employees, and representatives have regularly travelled to visit many of our Asian-based suppliers, conducting site visits, inspections, and tours of facilities.

During the 2020, 2021, and 2022 reporting periods, the COVID-19 global pandemic posed significant challenges and restrictions on site visits, presenting heightened risks to the health and safety of our employees. These challenges persisted into the 2024 fiscal year.

The restrictions on international travel presented considerable barriers and limitations in assessing modern slavery risks through on-site activities during this reporting period.

Despite these challenges, our risk management processes, and ethical sourcing policies were maintained.

Additionally, from 2020 to 2024, the TradeTools Group obtained signed statements from key international suppliers and manufacturers, confirming that the goods supplied to Group companies comply with the Australian Modern Slavery Act 2018 (Cth). These suppliers also declared that they conduct checks of their quality assurance processes to ensure adherence to the TradeTools Group's arrangements and agreements.

Assessment of Effectiveness

The TradeTools Group is committed to regularly assessing the effectiveness of our measures to identify and address modern slavery risks within our operations and supply chains. Our approach to effectiveness is based on ongoing monitoring, feedback, and review of our risk management practices.

Key indicators of effectiveness include:

- 1. Supplier Compliance and Engagement: The completion of signed statements from our international suppliers confirming compliance with the Australian Modern Slavery Act 2018 (Cth) and adherence to our ethical sourcing policies.*
- 2. Ongoing Risk Assessments: Regular reviews of supplier practices and country-specific risks, particularly in regions identified as having higher risks of modern slavery, such as China and India.*
- 3. Employee Training and Awareness: The effectiveness of our employee training programs, ensuring that staff are well-informed and capable of identifying modern slavery risks in day-to-day operations.*
- 4. Supplier Audits and Site Inspections: The resumption of on-site visits and audits when travel restrictions are lifted, along with any follow-up actions taken to address identified risks.*
- 5. Grievance Mechanisms: The functioning of grievance mechanisms that allow employees and suppliers to report potential issues related to modern slavery, and the number of cases reported or resolved.*

The TradeTools Group intends to further our assessments of slave labour within supply chains in the second half of CY 2023, 2024 and beyond through engaging with our Australian based suppliers to assess and identify risks of Modern Slavery within supply chains.

The TradeTools Group monitors and self-assesses the efficacy of our Modern Slavery identification and risk management processes annually, or sooner if deficiencies are identified.

Consultation within Group Entities

All TradeTools Group entities covered in this statement are managed from our Gold Coast based Group Head Office.

Appropriate Directors and senior managers were engaged and consulted with during the reporting period and in the production of this statement.

Subsequently, this report has been approved by the Board(s) of TradeTools Group companies.

TradeTools Pty Ltd ACN 010 700 053

ToolBrokers ACN 060 285 976

The TradeTools Group is committed to managing and eliminating the risk of modern slavery within Group supply chains, and to ongoing risk management and process improvement.

A handwritten signature in black ink, appearing to be 'Chee Zhong', with a long, sweeping line extending upwards and to the right.

Chee Zhong

Managing Director

March 2025