



**MODERN SLAVERY
STATEMENT
22/23**

Introduction

Jands Pty Ltd (**Jands**) is a privately owned business, head-quartered at 40 Kent Rd, Mascot, New South Wales, 2020 Australia and commenced its operations in 1970. Jands sells and distributes some of the world's leading Audio, Lighting and Staging brands for the installation, production and retail industries.

This Modern Slavery Statement covers the reporting period ending on the 30 June 2023 for Financial Year 2022-2023.

The purpose of this statement is to outline Jands approach to minimizing the risk of Modern Slavery in our business operations and supply chain as required by the Modern Slavery Act 2018 (Cth).

Due to the nature of our business, Jands recognises that we could be indirectly exposed to the risk of modern slavery through our supply chain. Jands is committed to operating both ethically and responsibly and to assessing the risk of modern slavery in our business and across our supply chain and confronting it when necessary.

Jands expects all of its suppliers, and their supply chain partners to provide a workplace free from discrimination, harassment or any other form of abuse, and to treat employees and other workers fairly, including with respect to wages, working hours and benefits, in accordance with applicable laws. Jands has a zero-tolerance approach towards any trafficking, forced labour and child labour.

1. Reporting Entity

The Reporting Entity is Jands Pty Limited.

2. Entity Structure, Operations and Supply Chain

Jands is a privately owned business, head-quartered at 40 Kent Rd, Mascot, New South Wales, 2020 Australia and commenced its operations in 1970. It has a 100% owned subsidiary in New Zealand, (Jands New Zealand Limited).

Jands services customers in both Australia and New Zealand out of its operations in Sydney, Melbourne, Brisbane, and New Zealand. Our customers include retailers, end-consumers, audio visual technology integrators, corporate businesses, Health, Education and Government entities.

Jands sources most of its products from international distribution channels with a large percentage of direct import. A smaller percentage of domestic purchasing is also undertaken within Australia. The majority of product sourced is manufactured in the Asia Pacific region, Europe, America, Canada or Mexico.



3. Modern Slavery risks in Jands' operations and supply chains.

The primary product sourced for Jands' operations is electrical product manufactured in the Asia Pacific region, Europe, America, Canada or Mexico either directly by our suppliers, or through their own contract manufacturing. Whilst we acknowledge that this is a risk, our core suppliers have their own Modern Slavery statements and subscribe to the principles protecting against Modern Slavery in their own operations and supply chains.

In terms of domestic suppliers, we believe that the bulk of our suppliers are low risk for Modern Slavery. One of our largest potential risk expenditures is for transport services, however, our core transport providers all have their own Modern Slavery statements, and are also required to comply with the Chain of Responsibility laws.

4. Modern Slavery actions taken to assess and address Modern Slavery risks

In order to assess and address Modern Slavery risks that may exist in the operations and supply chain, Jands has undertaken the following measures:

a. Compliance Program

Jands has developed a six-part modern slavery compliance strategy (**Modern Slavery Strategy**), which can be broken down as follows:

1. **Design** – Design and implement a Modern Slavery Risk Management Framework.
2. **Assess** – Conduct due diligence on the modern slavery risks within the business supply chain and operations and in particular our procurement processes, practices and dealings with Suppliers and Brand manufacturers.
3. **Mitigate** – adopt strategies for addressing the identified modern slavery risks
4. **Remediate** – Develop and implement appropriate remediation measures
5. **Monitor and Review** – Monitor and review the effectiveness of the Jands Modern Slavery Risk Management Framework and processes.
6. **Report** – Establish appropriate mechanisms for internal and external reporting.

In 2023, Jands has either in place or completed the following activities:

- A. **Design** – Development of Jands Modern Slavery Risk Management Framework
- B. **Assessment** – Issue of Jands supplier brands engagement and Modern Slavery Due Diligence Surveys (**Survey**) to understand current modern slavery risks.
- C. **Mitigation** – Sales and Supply Chain focused education – Jands has delivered in person bespoke Modern Slavery compliance training to the Executive, Sales and Marketing Teams and delivered digital training to these departments and the Logistics and Warehouse Teams including testing on the content therein.



- D. **Remediate** – Developed a remediation plan focused on ensuring that any potential breaches are investigated, and if proven correct, to have an appropriate rectification plan that is both outcome focused and timely.
- E. **Monitor and Review** – this is ongoing
- F. **Report** – we have policies and procedures in place

Specific Actions

Apart from the above, Jands has undertaken the following actions over the course of the year which we believe result in a reduction in risk.

Jands has continued to engage with our core suppliers to understand their own commitment to compliance with Modern Slavery legislation.

1. Where appropriate, Jands will engage directly with new and existing suppliers to continue to evaluate and understand the measures they have in place to ensure that modern slavery is not occurring within their own businesses.
2. Where relevant, Jands contractual documentation incorporates specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour.
3. Jands will continue to undertake and build on a training and education program, both to internal staff and with suppliers.
4. Jands will encourage staff to notify senior management of any concerns that they may have in respect of actions by suppliers that may be contrary to this Policy and use the protections provided in the Jands Whistleblower Policy. This will also include a mechanism for reporting any potential breaches to the Board of Directors.
5. Jands also require by way of contractual provision for our suppliers to hold their own suppliers to the same standards.

We note that our core suppliers who are potentially operating in an area of our supply chain that may be higher risk are fully aware of the requirements of Modern Slavery legislation as it applies across the globe, and therefore to our operations in Australia. Most of those suppliers have robust strategies in place with their suppliers that also provide for rights to audit.

Whilst the ongoing elements of our Modern Slavery Strategy are a work-in-progress and in first instance has focused on identifying categories of highest risk, we will continue to work our way through identified lower risk issues in the spirit of continuous improvement.



b. Modern Slavery Risk Management Framework

Ensuring suppliers and sub-contractors are aware of their obligations and expectations is key to eradicating modern slavery and as such, Jands has aligned its expectations to industry and global standards through supplier documents including a legal review process for all Supplier Contracts to request modern slavery compliance, Code of Conduct and Supplier Policies including a business Modern Slavery Policy.

Currently on foot, Jands have a framework of policies and procedures that address the Jands values, standards of behavior and expectations of our team. These policies and procedures are periodically reviewed by Human Resources and Legal.

This policy framework ensures that Jands staff (and suppliers) clearly understand our expectations in terms of the behavior, actions, and processes they take in specific scenarios. Please see outline of relevant Jands Policies **below**:

Policy	Purpose
Code of Conduct	The Code of Conduct ('Code') outlines the standards of behaviour and conduct expected from workplace participants in their dealings with customers, suppliers, clients, co-workers, management and the general public.
Anti-Discrimination & Equal Employment Opportunity Policy	This Policy outlines Jands commitment to provide an environment where employees and others in the workplace are treated fairly and with respect, and are free from unlawful discrimination, harassment, vilification and bullying. Jands aims to ensure that when employment decisions are made, they are based on merit, not on irrelevant attributes or characteristics that an individual may possess. Jands further endeavours to create a work environment which promotes good working relationships.
Whistle Blower Policy	The objective of this policy is to encourage reporting of wrongdoing that is of legitimate concern by providing a convenient and safe reporting mechanism, and protection for people who make serious wrongdoing disclosures.
Modern Slavery Policy	Addressing Jands commitment to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.



c. Remediation, Monitor & Review and Report

Jands has a focus on further developing the systems it has in place for ensuring ethical sourcing. This focus will also be subject to a continuous improvement by way of review of the effectiveness of the actions taken and confronting supplier risks and building on the identified positive outcomes.

Jands accepts that due to the complexity of our supply chains, eliminating Modern Slavery at all our suppliers and partners will take time and effort. Jands confirm their commitment to sustained initiatives, and educating partners where necessary, to progress towards eliminating Modern Slavery.

5. How the Reporting entity assesses the effectiveness of actions taken

Jands is continuing to develop processes to identify risk and to assess the impact. At this point in time, this will be a continued focus, but in regular discussions with our core suppliers, we believe that the companies that we deal with also subscribe to the principles contained in the Modern Slavery Act 2018.

We would assess the effectiveness of actions taken on two core outcomes, namely:

- that there is no identified breach in our operations and supply chain; and
- if there has been an identified breach, that the breach has been eliminated by way of appropriate and timely remediation plans.

6. Consultation with subsidiary entities in preparing the Modern Slavery Statement.

Jands has 1 subsidiary entity. The subsidiary entity owned by Jands is a 100% owned subsidiary, Jands (New Zealand) Limited ("JNZ") incorporated in New Zealand. In terms of structure, the 2 directors of JNZ are also directors of Jands. Further, all back-office support (e.g., purchasing, finance, etc) for JNZ are undertaken by staff of Jands. The Operations undertaken by JNZ is essentially the same as outlined in Item 2. Further, the suppliers of JNZ are common with those of Jands.

Notwithstanding this common approach to directors, and back-office support, the following actions are undertaken in consultation with JNZ:

- a. All suppliers of JNZ are included in the actions outlined in Section 4 (Modern Slavery actions taken to assess and address Modern Slavery risks). This also includes assessment of compliance by way of surveys.
- b. The JNZ operation also understands that where any risks are identified, mitigation and remediation processes will be undertaken to ensure compliance with the Modern Slavery obligations of the Reporting Entity.
- c. JNZ is included in our Modern Slavery Risk Management Framework. Specifically, all staff in our JNZ operation clearly understand our expectations in terms of behavior, actions, and processes that they undertake in specific scenarios. To that end, JNZ staff are included in all our training and education programs in relation to our compliance with Modern Slavery.
- d. JNZ is included in any review of effectiveness of actions undertaken and confronting supplier risks. We believe that we have in place for JNZ the same obligations and framework to identify risk, assess impact, and if a breach is identified, that the breach is eliminated by way of appropriate and timely remediation plans in consultation with the JNZ staff and suppliers.

In preparing this Statement, the JNZ management team were given an opportunity to review the draft Statement and to attend an information briefing session on the Statement, external



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trends, assurance and forward commitments for 2023. The objective of this was to ensure that whilst they are not an Australian reporting entity, that they:

- i. were to understand our modern slavery obligations and commitments;
- ii. they are informed of the Statement and;
- iii. that they invite questions and provide input.

7. Approval by the Principal Governing Body of the Reporting Entity.

This statement has been approved by the Board of Jands and signed by a director.

Paul Mulholland
Chairman