



## Modern Slavery Statement

**NHP Electrical Engineering Products Pty Ltd**

**2024/2025**



[www.nhp.com.au](http://www.nhp.com.au)

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## Purpose

This Modern Slavery Statement has been prepared in compliance with the Modern Slavery Act 2018 (Cth). It outlines the measures implemented by NHP Electrical Engineering Products Pty Ltd (“NHP”) to identify and mitigate risks of modern slavery within our operations and supply chain. The Statement serves as an essential instrument for fostering transparency and accountability, and it reflects our ongoing commitment to ethical business conduct and continuous improvement in combating modern slavery.

## What is Modern Slavery?

Modern slavery is a term that encompasses a variety of exploitative practices and is recognised by different names across various contexts. At its core, modern slavery describes situations in which individuals are subjected to exploitation and are unable to refuse or escape these circumstances due to the presence of threats, violence, coercion, or deception. Such exploitation can occur in multiple forms and includes, but is not limited to, the following activities:

- Slavery: where ownership is exercised over an individual
- Servitude: involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them.
- Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child’s education, health (including mental health), physical wellbeing or social development.

It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery. These practices may also escalate into modern slavery if not addressed.

All forms of modern slavery have in common the deprivation of a person’s liberty by another in order to exploit them for commercial or personal gain, and amount to a violation of an individual’s fundamental human rights.

### 1. REPORTING ENTITY

#### Our Business

NHP is a privately owned Australian electrical engineering products distributor and manufacturer. Its Head office is in Melbourne, Australia with around 800 employees located across more than 20 branches in Australia and New Zealand. NHP has been trading since October 1968.

#### Our Values

NHP’s values clearly articulate the standards of conduct and behaviour expected from all employees when representing the company. We are dedicated to upholding the highest levels of professionalism and ethical integrity throughout our operations and supply chain management. NHP remains committed to responsible business practices and to ensuring that human rights are respected across all areas under our influence.

NHP's Guiding Principles of Enjoyment, Team Spirit, Flexible Discipline, Accountability, Empower the Customer and Make a Difference are the compass for our actions, decisions and behaviours.

## 2. STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### Organisational Structure & Operations

NHP's core operations are driven by an extensive sales team, complemented by product management and technical specialists. The company's supply chain encompasses the sourcing, manufacturing, and distribution of approximately 70,000 SKUs utilised across construction, mining, manufacturing, and commercial building sectors. In line with this, NHP sources a number of products from overseas manufacturers based in Europe, the United Kingdom, America, and Asia, and efficiently manages their distribution within Australia and New Zealand.

### Supply Chain Mapping

NHP conducts ongoing risk assessments regarding modern slavery within our operations and supply chains, utilising resources such as the Global Slavery Index and other relevant materials to evaluate potential risks. Multiple factors are considered to identify practices associated with modern slavery in countries where our suppliers operate. This process includes online supplier audits, which are reviewed bi-annually in collaboration with supply line partners, along with consultation from Product Managers who have completed applicable training.

NHP also routinely prepares a report mapping the countries of origin for products involved in our manufacturing or supplied to customers. This report is regularly cross-referenced with data from the Global Slavery Index to effectively identify and monitor countries that may present higher risks.

## 3. RISK OF MODERN SLAVERY IN OUR SUPPLY CHAIN

### Risk of Modern Slavery in our Supply Chain

Based on the audits and mapping reports conducted, NHP has determined that less than 34% of our goods and services are sourced from outside Australia. By referencing global frameworks such as the Global Slavery Index 2025, we have verified that we do not procure products from any of the countries identified as having the highest risk or the largest estimated populations affected by modern slavery.

Nevertheless, NHP recognises that the risk of modern slavery may be elevated in certain countries historically identified as high risk. Accordingly, we closely monitor these regions and acknowledge that both China and Malaysia are classified as at-risk countries for electronics imports into Australia. We are continually evaluating the need to implement more frequent assessments of these suppliers.

## 4. DUE DILIGENCE AND REMEDIATION PROCESSES

### Supply Chain Management

At NHP, we implement comprehensive due diligence procedures when assessing prospective suppliers and consistently review our existing supplier base. Our evaluation process encompasses:

- Broadly mapping the supply chain to identify product-specific or geographic risks related to modern slavery and human trafficking;

- Assessing modern slavery and human trafficking risks for each new supplier;
- Periodically re-engaging with current suppliers biennially through an automated system managed by the relevant Product Manager;
  - During this reporting period, we have distributed an updated questionnaire to all SLPs.
- Conducting targeted supplier audits or assessments with heightened attention to slavery and human trafficking where general risks are identified;
- Developing a "Take 5" document for Product Managers to utilize during visits to overseas supply partners, supporting the review of work practices and ensuring compliance with our anti-slavery standards and supplier code of conduct;
- Imposing sanctions on suppliers that fail to meet improvement plans or commit significant violations of our supplier code of conduct, up to and including termination of the business relationship.

We maintain continuous evaluation of the effectiveness of our procedures across Governance, Procurement, Supply Chain, HR practices, and Reporting. Recognizing that due diligence is an ongoing commitment throughout our operations, we remain dedicated to initiatives that enhance the monitoring and efficacy of our processes, working collaboratively with our supply line partners and product managers.

During the current reporting period, NHP has established a cross-functional team focused on ESG (Environmental, Social, and Governance) initiatives. This team is committed to strengthening relationships with supply line partners in areas such as modern slavery prevention, basic human rights, and sustainability.

### **Supplier Code of Conduct**

NHP is actively committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship. This applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

NHP expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with the Supplier Code of Conduct and to act in a way that is consistent with its values. The Company will only do business with organisations who fully comply with this code, or those who are taking verifiable steps towards compliance.

### **5. ASSESSING EFFECTIVENESS OF OUR ACTIONS**

To underpin the commitments laid out in this policy statement, NHP will continue to collaborate and improve upon the procedures put in place during previous reporting periods including the following activities such as:

- Bi-annual reviews of our suppliers' base to identify where greatest potential exposure for modern slavery is within our supply chain.
- Ongoing continuous improvement in our supply chain and risk assessment processes for both current and potential supply line partners.
- Regular reviews of resources such as the Global Slavery Index to ensure we are on top of any changes to risk ratings for countries that are part of our supply chain.
- Ongoing automated audits and assessments of our supply chain to ensure secure capture of information.

- Regularly review our contractual documentation to ensure it clearly sets out specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy statement.
- Continue to engage directly with new suppliers in respect of our Modern Slavery Statement, Modern Slavery Policy and Supplier Code of Conduct in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.
- Continue to make provision for our contracted suppliers to hold their own suppliers to the same standards.
- Conducting internal reviews with product managers and senior executives to ensure that they have an awareness of and are in alignment with the processes in place with regards to modern slavery risks in our supply chain and across our business in general.
- Reserving the right to terminate any contractual arrangement if there is breach of this statement or the Supplier Code of Conduct.

## 6. CONSULTATION

This statement applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

NHP expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this statement and to act in a way that is consistent with NHPs values. The Company will only do business with organisations who fully comply with this statement and our Supplier Code of Conduct, or those who are taking verifiable steps towards compliance.

NHP addresses the risk of modern slavery through its onboarding process and ongoing education of its contractors through its safety management portal.

We note that NHP do not own or control any other entities and therefore criteria 16(1)(f) is not applicable.

## 7. OTHER RELEVANT INFORMATION

### Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Human Resources Policy - We have zero tolerance of any threat of physical or sexual violence, harassment, or intimidation against employees and their family, or close associates. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally and are paid at least the national minimum wage.
- Procurement Policy - The organisation is committed to conducting purchasing activities in a fair, objective, and transparent manner that satisfies the requirements of accountability and internal controls including but not limited to NHP's 'Quality Management', 'Environmental', 'Ethical Code of practice', and 'Anti-Bribery' policies which fulfil legal and financial obligations and effectively manages commercial risk. Emphasis is placed on selecting suppliers and service providers that demonstrate recognisable environmental, sustainable, business integrity along with Corporate Social Responsibility (CSR) standards including but not

limited to compliance with laws and regulations, respect for human rights, labour working conditions, equal opportunities, health and safety accreditation, maintenance and promotion of information security, fair trade, and acceptable corporate ethics.

- Recruitment Policy - The organisation uses only specified, reputable employment agencies to source agency workers and always verifies the practices and licences of any new agency it is using before accepting workers from that agency.
- Whistleblowing Policy - We encourage all of our employees, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, NHP. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.
- Code of Conduct Policy – NHP has established a document that is provided to all current and potential NHP employees providing a framework for the appropriate behaviour expected of them whilst they are representing NHP. The policy and supporting procedures apply to all NHP employees.

NHP regularly review their policies to ensure they remain effective and relevant in addressing emerging risks associated with modern slavery. We engage in periodic policy audits and seek feedback from staff and stakeholders to further strengthen our approach to ethical business practices and compliance. This commitment supports our ongoing efforts to maintain transparency, integrity, and accountability throughout our operations and supply chain.

### **Breaches of This Policy Statement**

A breach of this Policy Statement by any employee, director, or officer of the Company may result in disciplinary action in accordance with the Company's Disciplinary Procedure. In cases of serious breaches, such conduct may be deemed gross misconduct and could result in immediate termination of employment.

All employees are required to fully cooperate with any investigation into suspected breaches of this Policy Statement or any associated processes or procedures.

Should any aspect of this Policy Statement require clarification, employees are encouraged to seek guidance from the Human Resources department.

### **Communication and Employee Awareness Training**

Line Managers are responsible for ensuring that all relevant employees receive sufficient training on this policy statement, as well as any associated procedures that are pertinent to their specific roles. This approach helps to ensure that all staff members are aware of their responsibilities and the standards expected in relation to modern slavery practices.

Product Managers at NHP receive targeted training on the requirements set out in the Modern Slavery Act, with a particular focus on how these requirements impact their interactions with supply line partners. This specialised training ensures that Product Managers can effectively identify and manage risks within the supply chain.

NHP is committed to the ongoing review and enhancement of training and communication efforts regarding modern slavery risks and trading requirements. This includes regular updates to training content and methods of communication to ensure all contractors and employees are kept informed of current expectations and obligations.

Furthermore, NHP has undertaken comprehensive internal training initiatives across all departments within the Supply Chain. These sessions are designed to reinforce awareness and understanding of the policy, and to equip staff with the knowledge needed to identify and address potential modern slavery risks within their area of responsibility.

### **Responsibility for This Policy**

The Executive Board holds ultimate responsibility for this Policy Statement and for ensuring that the Company fulfills all legal and ethical obligations arising therefrom.

The Chief Executive Officer (CEO) or Managing Director is entrusted with primary, day-to-day responsibility for the implementation of this Policy Statement. This includes monitoring its application and ensuring that appropriate processes and control systems are established, maintained, and amended as necessary to ensure the effective operation of the Policy Statement.

Each member of the Executive Team is accountable for ensuring that their respective functions comply with the provisions of this Policy Statement in the daily execution of their duties.

### **Status of This Policy Statement**

This Modern Slavery Policy Statement is subject to periodic review by the Executive Board. This notice outlines the Company's current practices. NHP will revise the statement as necessary to reflect applicable legal and operational requirements.

### **Approval of Statement**

This Statement was approved by the board of NHP Electrical Engineering Products Pty Ltd on 11 November 2025.



**Julian Britto**  
Managing Director / CEO  
11 November 2025