

Lawrence & Hanson Group Pty Ltd

ABN 69 080 350 812

## **Modern Slavery Statement**

**1 January 2022 - 31 December 2022**

## Foreword from our Managing Director

Lawrence & Hanson Group Pty Ltd (**Lawrence & Hanson**) is part of the Sonepar Group, the leading global group in B-to-B distribution of electrical products, solutions and related services spanning over 40 countries with 45,000 associates. Lawrence & Hanson is committed to key attributes of compliance, integrity, honesty and trust. These attributes underpin our business operations and have guided us in our journey as Australia's most recognised electrical wholesaler. We believe that these attributes should never be sacrificed in the pursuit of profits. Moreover, these attributes ensure that we act ethically and mitigate modern slavery and human trafficking risks in our operations and supply chains.

Lawrence & Hanson acknowledges that modern slavery and human trafficking is a global and complex challenge and this is an issue which the Sonepar group has taken steps to manage for some time. Lawrence & Hanson complies with Sonepar's global policies and procedures in this space but also takes steps locally to address this complex issue.

This modern slavery statement (**Statement**) under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) covers the reporting period from 1 January 2022 to 31 December 2022 (**FY22 Reporting Period**) and:

- **outlines the steps we are already taking** at a global and local level to identify modern slavery risks and assess and address these risks.
- **identifies our key risks and priority areas that we will focus on moving forward** which have been identified based on our high level risk mapping. These include:
  - high risk suppliers within our supply chain
  - cleaning service providers utilised across our branch network
- **sets out the steps we intend to take as part of our modern slavery compliance roadmap over the next few reporting periods**

We are proud of the approach the Sonepar group has taken to date and Lawrence & Hanson is committed to upholding the aims and requirements under the Modern Slavery Act. We understand ethical procurement is an important part in being Australia's electrical wholesaler of choice.

We recognise the major role that market leaders such as Lawrence & Hanson have to play in combatting modern slavery in global supply chains.

### Principal Governing Body Approval

This modern slavery statement was approved by the Board of Lawrence & Hanson Pty Ltd (ABN 69 080 350 812) in their capacity as principal governing body of Lawrence & Hanson (in accordance with section 13 of the Modern Slavery Act 2018 (Cth)) on 10 August 2023.

### Signature of Responsible Member

This modern slavery statement is signed by Gavin Street in their role as Managing Director of Lawrence & Hanson Pty Ltd (ABN 69 080 350 812) (in accordance with section 13 of the Modern Slavery Act 2018 (Cth)) on 10 August 2023.

  
Gavin Street  
Managing Director

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**1. Criterion 1 Identify the reporting entity**

- 1.1 The reporting entity is Lawrence & Hanson Group Pty Ltd (ABN 69 080 350 812) , Level 2, 1 Chapel Street, Blackburn VIC 3130 (referred to as **we, us, our or Lawrence & Hanson** in this Statement).
- 1.2 Lawrence & Hanson is a reporting entity under the Modern Slavery Act and this Statement is submitted and published for the FY23 Reporting Period.
- 1.3 Lawrence & Hanson makes this Statement in accordance with section 13 of the Modern Slavery Act as a single reporting entity.
- 1.4 Our Statement covers all of the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act. In preparing this Statement, we have used the Commonwealth Guidance for Reporting Entities and recently issued Modern Slavery Act Supplementary Guidance to help inform and guide our approach.

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**2. Criterion 2 Describe the reporting entity's structure, operations and supply chains**

**2.1 Our Structure**

- 2.1.1 Lawrence & Hanson is an Australian private limited company limited by shares and is incorporated in Australia.
- 2.1.2 Lawrence & Hanson is part of the global Sonepar Group, an independent family owned company and its ultimate parent company Sonepar SA headquartered in Paris, France.
- 2.1.3 Lawrence & Hanson's registered office is in Blackburn, Victoria.
- 2.1.4 Lawrence & Hanson is the only operating entity in Australia and while it does own or control some other entities for the purpose of the Modern Slavery Act, these are non-operational and are in the process of being deregistered.

**2.2 Our Operations**

- 2.2.1 As per the Commonwealth Guidance, 'operations' refers to activities undertaken by the entity to pursue its business objectives and strategy in Australia or overseas. This includes the manufacturing, distribution and procurement of products and services.
- 2.2.2 We are Australia's most recognised electrical wholesaler and have over 160 branches across Australia.
- 2.2.3 We have a wide range of key operations. These are:

**Physical and online stores** – we offer a wide range of electrical products and have long-standing relationships with the most trusted local and global suppliers in the electrical industry. We also operate an online store via our eBranch where we sell individual products. We set out our product range in the diagram below.





**eBusiness Solutions** – we offer a wide range of digital eBusiness solutions to help our customers improve the efficiencies of their business. Our eBusiness solutions include: Spend Reports, Integrated Solutions, Automated Data Export, Punchout & OCI, eInvoicing and Electronic Document Interchange.

**Lawrence & Hanson Pacific Datacom** – we offer copper, fibre, and wireless premise network cabling products and materials, turnkey product solutions, wireless network design and configuration services, and supply chain optimisation services.

**Lawrence & Hanson Solar + Solutions** – we supply a wide range of solar and renewable energy solution products. Our solutions are provided to domestic, commercial and industrial customers.

**Lawrence & Hanson Specialised Lighting Solutions** – we assist in lighting design, installation and maintenance projects.

**Supply and distribution of industrial consumables** - we supply industrial products to the construction, industrial and the original equipment manufacturer markets. We also provide project management services and distribute industrial automation services to a variety of industrial customers.



Tools & Safety



Installation Materials



Renewable Energy



Heating, Cooling & Air

## 2.3 Our Supply Chains

- 2.3.1 Our supply chain is complex and long and we have a wide range of suppliers with a mix of Australian and overseas suppliers.
- 2.3.2 However, for our direct suppliers, approximately 75 percent of our total spend is with 30 of trusted suppliers who we have a close and long term relationship with and are on our Preferred and Approved Supplier Program.
- 2.3.3 In order to be part of the Preferred and Approved Supplier Program, these supplier are required to agree to our modern slavery contractual controls contained in the Lawrence & Hanson Trading Terms (**Trading Terms**) and the Sonepar Supplier Code of Conduct (**Supplier Code of Conduct**).
- 2.3.4 A number of our key suppliers are companies who themselves are required to report under the Modern Slavery Act. We have mapped out our supply chains at a high level as set out in the following table.

No.	Product / Service category	Key themes
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### *Key direct suppliers used in relation to core product and service offerings*

1.	Switches and Outlets	
2.	Circuit Distribution	As Australia's leading electrical wholesaler, Lawrence & Hanson procures a wide range of electrical products such as switches and outlets, renewable energy products, and electrical tools. These supplied products support our key product and service offerings to Australian businesses and organisations (see section 0 above).
3.	Lighting and Lamps	
4.	Heating, Ventilation and Air Conditioning	
5.	Installation Materials	
6.	Safety	
7.	Tools	
8.	Power Cable	As outlined above, of our direct suppliers, approximately 75 percent of our total spend is with 30 of trusted suppliers who we have a close and long term relationship with and are on our Preferred and Approved Supplier Program.
9.	Fire, Automation and Security Systems	
10.	Connect	
11.	Renewable Energy	We have identified that a number of these suppliers also have modern slavery reporting obligations.
12.	Data and Communications	
13.	Industrial Automation	

### *Indirect Suppliers*

14.	Office Supplies	To support our key product and service offerings, Lawrence & Hanson engages a range of other suppliers who supply goods or services that are not integrated or used in our electrical products and services.
15.	IT Equipment	
16.	Cleaning Services	
17.	Professional services (i.e. Marketing, Legal)	These are suppliers from whom we purchase goods and services relating to, for example,



No.	Product / Service category	Key themes
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cleaning services, office supplies and professional services and more.

We have identified that a number of these suppliers also have modern slavery reporting obligations.

**3. Criterion 3 Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.**

- 3.1.1 In this section we identify the 'risks of modern slavery practices', meaning the potential for Lawrence & Hanson to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.
- 3.1.2 In this context, 'risk' means to people, rather than the risks to Lawrence & Hanson (such as reputational or financial damage).
- 3.1.3 Although Lawrence & Hanson together with Sonepar have been committed to combatting modern slavery for some time, we understand that we are in the first few years of our formal modern slavery journey under the Modern Slavery Act.

In accordance with the Government Guidance and known modern slavery indicators, we have done a high level risk mapping exercise of our operations and supply chains which is set out in the table below:

**High level risk mapping exercise of our suppliers**

Category of modern slavery risk indicators	Explanation	Suppliers Identified
Sector and industry risks	<p>A sector or industry that is informal and unregulated or has limited visibility over lower tier suppliers, is higher risk.</p> <p>A sector or industry that uses seasonal, low-paying or low-skilled labour or dangerous work is higher risk.</p> <p>Personal protective equipment (PPE), electrical components and equipment and cleaning are higher risk industries. The PPE industry has been noted to be at high-risk of modern slavery during the COVID-19 pandemic. Electrical components and equipment has a long international supply chain for its raw materials manufacture and product assembly – we consider the lack of visibility in these supply chains to be a modern slavery risk.</p>	<p>Lawrence &amp; Hanson's business involves the use of several direct suppliers in respect of PPE, and electrical components and equipment.</p> <p>We also use cleaning services for our branches and office premises.</p>
Product and service risks	Some products and services are considered higher risk because of the way they are produced, provided or used.	As above we have identified PPE, electrical components and equipment

	<p>The development of a product or delivery of a service may have been reported as involving labour exploitation by international organisations or non-governmental organisations.</p> <p>E.g. Raw materials are recognised as high risk globally.</p> <p>E.g. cleaning services are high risk services.</p> <p>E.g. PPE is recognised as high risk.</p>	<p>and cleaning services as higher risk product and service risks.</p>
Geographic risks	<p>Victims may be working in a country that has a high prevalence of human rights violations, has inadequate protections for workers, forces parts of the population to work for development purposes (for example, to assist on a compulsory basis with construction or agriculture projects) or has a high prevalence of people who are vulnerable to exploitation.</p> <p>The Global Slavery Index is a useful tool to identify the prevalence of modern slavery and human trafficking in a particular country, and to assess the adequacy of a government's response to modern slavery and human trafficking risk (see the list below of countries identified in the Global Slavery Index as taking the least action in respect of modern slavery). However, we recommend that you do not rely on numerical scores alone, as some regions or economic sectors may be at disproportionate risk of modern slavery and human trafficking, when compared to a national average. For example, there are extensive reports regarding the use of forced labour involving the Uyghur minority in mainland China, especially but not exclusively in the Xinjiang region.</p> <ol style="list-style-type: none"> <li>1. North Korea</li> <li>2. Eritrea</li> <li>3. Libya</li> <li>4. Iran</li> <li>5. Equatorial Guinea</li> <li>6. Burundi</li> <li>7. Democratic Republic of the Congo</li> <li>8. Congo</li> <li>9. Russia</li> <li>10. Somalia</li> </ol>	<p>We have not identified any suppliers who are based in the highest risk countries.</p> <p>However, we understand that some of our <b>direct suppliers</b> may have manufacturing operations in higher risk countries such as China, Taiwan, South Korea and Malaysia.</p> <p>However, we have controls in place with our Preferred and Approved Supplier program.</p> <p>Accordingly we have identified direct suppliers who we have significant spend with but are not captured by the Approved and Preferred Supplier Program as an area of focus.</p>
Entity risks	<p>Some businesses or other entities may have a higher risk because of poor governance structures, a record of treating workers poorly or a track record of human rights violations.</p>	<p>A significant portion of our spend is with suppliers on our Preferred and Approved Supplier Program. We consider these suppliers to have lower risks because of the controls on this Preferred and Approved Supplier Program (see section 0 below for more information).</p>



	An example of a red flag would be if you found a supplier to have been the subject of media reports of poor treatment of its workers.	As above, we have identified certain direct suppliers who are not currently part of the Preferred and Approved Supplier Program as potentially having higher entity risks and we intend to investigate this further.
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**3.2 Analysis of which suppliers are also reporting entities under the Modern Slavery Act**

We have also undertaken a high level assessment of our some of our Preferred and Approved Suppliers to identify which of these entities have also submitted modern slavery statements to the Australian Government run register under the Modern Slavery Act, this assessment has helped us to gain an understanding of which entities may or may not have reporting obligations under the Modern Slavery Act. A number of our Preferred and Approved Suppliers are themselves reporting entities under the Modern Slavery Act and have submitted modern slavery statements. This process has also helped inform us of our prioritised risk based approach to focus on the suppliers listed in section 3.4.

**3.3 Our priorities**

3.4 Based on this high level risk mapping exercise we intend to take a prioritised risk based approach as recommended by the Government Guidance.

3.5 In the next few reporting periods we will be focussing our efforts on the following key areas which we have identified as having higher risks and where we have the most leverage:

- key direct suppliers who provide higher risk products being PPE, Electrical Components and Equipment and who have not been through our Preferred and Approved Supplier Program; and
- our cleaning service providers for our approximately 160 branches.

**4. Criterion 4 Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes**

Set out below in this section is an overview of the steps we have taken during this reporting period to assess and address the risks in our operations and supply chains.

**4.1 Global Policies and Procedures**

As noted last year, Lawrence & Hanson is part of the Sonepar Group which has a number of policies and procedures in place designed to assess and address the risks of modern slavery.

- Global Code of Conduct
- Whistleblower Policy and Platform



- Global Supplier Code of Conduct

In addition, in December 2022, Sonepar released a further policy as below:

- **Human Rights Policy:** this global policy applies to Sonepar entities and their staff and outlines Sonepar's requirement to comply with various aspects of human rights.

#### 4.2 Local Policies and Procedures

As noted last year, Lawrence & Hanson has a number of policies and procedures in place designed to assess and address the risks of modern slavery.

- Global Code of Conduct
- Preferred and Approved Supplier Program
- Business Partner Assessment

#### 4.3 Our modern slavery roadmap

During 2022, Lawrence & Hanson completed the following tasks on its modern slavery roadmap:

- Modern Slavery working Group:** Established of modern slavery working group, to ensure ownership and responsibility within the organisation for driving our modern slavery journey. Members of this group include key management responsible for the areas of risk previously identified.
- Anti-Modern Slavery Policy:** Developed and published our Anti-Modern Slavery Policy to our staff on the company intranet.
- Modern Slavery Training Module:** Developed a Modern slavery training module hosted on our internal learning platform. This training was completed by all key staff across our business.
- External Supplier Survey:** Developed our external supplier survey for our suppliers to bolster our modern slavery due diligence process to assist us in identifying modern slavery risks in our supply chain.
- Preferred and Approved Supplier Survey:** Completion by our Preferred and Approved Suppliers of our external supplier survey to better understand their compliance with modern slavery and enhance our understanding of the modern slavery risks in our supply chain.
- Branch Survey of Cleaning Activities:** Completed a survey of all our branches to determine the use of external cleaners within their business with a view to assessing our modern slavery risks in this area.
- (g)

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## 5. Criterion 5 Describe how the reporting entity assesses the effectiveness of these actions

- 5.1 Lawrence & Hanson intends to use key performance indicators (KPIs) to measure how effective we have been in identifying and mitigating modern slavery risks in our supply chain. Based on these KPIs, we will continually assess and improve our modern slavery compliance framework. Some of these KPIs include the following for FY22 while future KPIs will be driven by our modern slavery roadmap (see 'looking ahead') in Section 0:

No.	Key objective	Key performance indicator
1.	Implement and approve the Anti-Modern Slavery Policy.	Policy approved in June 2022
2.	Communicate to all staff (for example via email or our Intranet) about the Anti-Modern Slavery Policy to raise awareness of the Policy and what is required of staff.	Published on company intranet, with associated communications to staff
3.	Commence the roll-out of our anti-modern slavery training program with key staff (such as those in procurement) to raise awareness of key concepts of modern slavery and human trafficking.	All key staff completed the mandatory modern slavery training module
4.	Completion of supplier survey by Preferred and Approved suppliers	Supplier survey was distributed to all preferred and approved suppliers with responses provided, including copies of modern slavery policies and statements
4.	Completion of branch survey of cleaning contractors being used	Responses received from all our branches outlining who completes their cleaning activities

**6. Criterion 6 Describe the process of consultation with any entities the reporting entity own or controls (a joint statement must also describe consultation with the entity giving the statement)**

As set out in section 2 above, we are the only legal reporting entity in Australia. Whilst we do own or control some other entities for the purposes of the Modern Slavery Act, these are non-operational and are in the process of being deregistered. As such, it was not necessary to consult with any other entities to prepare this Statement. Our Risk Committee which involves a number of Lawrence & Hanson's executive team has also been involved in the development and review of this Statement prior to Board approval.



## 7. Criterion 7 Provide any other relevant information

### 7.1 Looking ahead

7.1.1 Lawrence & Hanson continues to formalise our priorities in relation to modern slavery for the next 2-3 years and beyond. We continue to assess our strategic roadmap to address our modern slavery risks as they become evident and set this out below:

7.1.2 During **FY23 (1 January – 31 December 2023)**, we intend on implementing the following projects.

- (a) **Preferred and Approved Supplier Survey:** Assess the submissions provided our preferred and approved suppliers to ensure we are satisfied with their responses, and determine any necessary actions.
- (b) **Branch Cleaning Contractors:** Where branches have advised they have external cleaning contractors, have them complete our external supplier questionnaire so as to enable us to assess the risk of modern slavery in this area of identified risk.
- (c) **Modern slavery training for remainder of staff** – have all remaining staff complete our modern slavery training module and ensure all new starts complete as part of their on-boarding process.
- (d) **Supplier Survey** – extend our supplier survey to the next tranche of high risk suppliers
- (e) **Supplier pre-screening questions for modern slavery** – this will supplement our current practice of requiring suppliers to sign our Supplier Code of Conduct, Trading Terms, and undergoing our Business Partner Assessment (for overseas suppliers) prior to approval in our system. The addition of the supplier pre-screening questions will bolster our modern slavery due diligence process to better manage modern slavery risks.
- (f) **Modern slavery response guide** – this response guide will detail how Lawrence & Hanson deals with modern slavery risks and impacts internally. The response guide would detail clear, internal reporting channels for modern slavery risks and incidents, including mechanisms for continuous feedback, management oversight, escalation processes and accountability reporting to the Lawrence & Hanson leadership team.

7.1.3 During **FY24 (1 January – 31 December 2024) and ongoing**, we intend on implementing the following projects.

- (a) **Continue to review and build on our anti-modern slavery training and education program** –this will involve considering any feedback received from the training rolled out in FY22 and FY23 and continuing to roll out training and education to appropriate staff.
- (b) **Continue to rollout the completion of our supplier surveys** – we will rollout the supplier survey to the next tranche of identified risk suppliers.
- (c) **Continue to understand the risk within our supply chain**

7.2 We consider that these steps in our modern slavery compliance roadmap will put Lawrence & Hanson in a good position to identify and mitigate modern slavery risks in our business operations and supply chains.

7.3 These projects set out in the Road Ahead are of crucial importance to us. We understand the role we have to play in combatting modern slavery as Australia's largest electrical wholesaler and electrical wholesaler of choice.

## MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

### Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Lawrence & Hanson Pty Ltd (ABN 69 080 350 812) as defined by the *Modern Slavery Act 2018 (Cth)* ("the Act") on 30 June 2023.

### Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of Lawrence & Hanson Pty Ltd (ABN 69 080 350 812) as defined by the Act



Gavin Street  
**Managing Director**  
10 August 2023

### Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
1) Identify the reporting entity.	3
2) Describe the reporting entity's structure, operations and supply chains.	3-6
3) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	6-8
4) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	8-9
5) Describe how the reporting entity assesses the effectiveness of these actions.	9-10
6) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	10
7) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Forward (page 2) 11