



G. JAMES

This statement is pursuant to the 'Modern Slavery Act 2018' ('the Act') and describes the steps that the G. James Trading Group of Companies have taken to address modern slavery and human trafficking across the business and our global supply chains over the reporting period ending June 30th, 2020 and sets out our plans for future improvements.

This statement is prepared based on information collected from the G. James Trading Group of Companies ["G. James"] listed below. Each of these legal entities have been consulted on the statement itself.

G. James is committed to ensuring modern slavery is not present in any of its supply chains and is working closely with its suppliers to ensure they too align with the principles and values both of G. James and the *Modern Slavery Act 2018*.

This statement is valid for the G. James Trading Group of Companies ["G. James"] as listed below:

Company Name	ABN	Registered Address
G. James Pty Ltd	25 009 696 404	1084 Kingsford Smith Drive, Eagle Farm, QLD 4009
G. James Australia Pty Ltd	47 010 823 542	
G. James Safety Glass (Qld) Pty Ltd	55 010 828 065	
G. James Extrusion Co Pty Ltd	95 010 828 234	
G. James Glass & Aluminium Pty Ltd	23 010 828 369	
G. James Glass & Aluminium (Qld) Pty Ltd	53 010 828 056	
G. James Safety Glass Pty Ltd	86 001 230 039	
Contract Glass & Aluminium Pty Ltd	51 010 828 047	
G. James Remelt Pty Ltd	38 056 371 076	
G. James Engineering Services Pty Ltd	91 057 404 485	
Cheras Industries Pty Ltd	45 009 674 677	
G. James (N.Z.) Limited	AK/682939	

Company Overview

G. James is one of Australia's leading integrated Glass & Aluminium manufacturers and contractors, with over 2000 employees operating from 32 sites in Australia and New Zealand. It is a wholly Australian owned company, operated by the same family for 103 years. Primarily involved in the manufacture, fabrication, processing, and installation of a diverse range of products, the organisational structure is broken down into the following four primary specialisations:

Aluminium Products

Extruding standard, geometric, proprietary, structural and DNV certified aluminium extrusions. Support services include die design, powder coat and anodised surface finishing, cut-back & special purpose machining, warehousing, and despatch.

Glass Products

Manufactures and markets an extensive range of laminated, toughened, decorative, and painted glass products, in addition to a variety of insulated glass solutions. Four large scale production centres are equipped with state-of-the-art processing facilities to service the needs of building & construction, automotive, marine, rolling stock, and security industries.

Façade Solutions

Servicing Australia's building contractors with the expertise and products necessary to realise the successful completion of commercial and high-rise curtain wall projects. An ability to satisfy ever-challenging design aspirations is enhanced by a strong tradition of specialising in bespoke façade and cladding solutions, inhouse capabilities and support services along with the advantages of Australian based manufacturing.



G. JAMES

Windows & Doors

An Australia wide network of manufacturing branches supplying the housing and construction market with a comprehensive range of windows, doors, and associated screening products. Commercial contracting capability along with the benefits of locally based operations complete the full-service package offered to our valued customer base.

Each of these divisions' manufacturing and sales operations are overseen by their general managers and supported by key national functional managers, all of whom report to the managing director.

Additional functions within the group are:

QuickAlly

QuickAlly Scaffolding & Access Solutions manufacture an extensive range of durable, high quality, temporary structures all designed for working at heights in complete safety. Proudly Australian made and supported by our industry leading warranty, this range encompasses everything from an aluminium step-up, through to a customised work platform, and right up to multi-level building perimeter scaffolds.

Gossi Park and Street Furniture

Gossi Park and Street Furniture offer a core range of attractive, low maintenance furniture constructed from a selection of aluminium and/or timber components. This range is complemented by stylish aluminium shelters, non-combustible bin surrounds, and other park enhancements such as bollards, drinking fountains, and bike racks, making Gossi the obvious choice for park or streetscaping projects.

Cheras Industries

Specialising in the production of aluminium castings for commercial, rural, marine, and general-purpose applications. These include lawn mower bases, trailer wheels, roof tile pallets, lighting and irrigation components, zinc anodes, and structural castings.

Supply Chains

G. James deals primarily with Australian supplier entities, importing less than 5% of its material requirements. We expect that this number will further reduce in FY21. G. James' largest material purchases relate to raw materials used in our manufacturing processes. This includes Aluminium Billet, Glass, Aluminium Mesh, Timber, and Paint.

Raw Materials

Approximately 85% of our Aluminium is sourced locally, while the remainder of our requirements are imported from Qatar. Primarily glass sheets are manufactured in Victoria, Australia which accounts for approximately 90% of glass volume processed in our facilities, while secondary suppliers located in the Peoples Republic of China; Indonesia; The United States of America; Belgium; Japan; Malaysia; and, Thailand supply the subsequent 10% of raw material. Aluminium Mesh is sourced from an Australian enterprise, however we identify that this product is manufactured in one of two facilities based in Thailand and Taiwan, respectively. Timber as a raw material is procured from seven local suppliers, however we do recognise that dependant on the species and specifications, these products may be sourced from local and imported products. Paint and finishing powder are procured from three major suppliers, two of which are Australian, while our specialised glass printing inks are imported from Israel. Our largest hardware and component supplier is also an Australian based company. Products and components from this supplier are both locally produced, and imported from the Peoples Republic of China, and New Zealand for assembly in Australia.

Identified Risks Relating to Modern Slavery

With more than 3,000 active suppliers in the 2019/2020 financial year, G. James recognises that we are not immune to risk in our extended supply chain. While there was no severe human rights violations detected in our own operations in FY19/20



G. JAMES

and the risk of incidence of child labour abuse, compulsory or forced labour was low, we do recognise that there is a risk of forced or compulsory labour among suppliers in the Middle East, South America, and Asia for goods used in our business such as rubber, timber, clothing, and promotional materials. Following the release of the March 1, 2020 report by the Australian Strategic Policy Institute titled 'Uyghurs for sale' G. James has identified exposure to exploited labour within our supply chain. The report claimed that 27 factories in nine Chinese provinces were using exploited Uyghur labour, listing 82 global brands which use products from these factories in their supply chains. The brands in which G. James have identified within our assets include Apple, Cisco, HP, Lenovo, Microsoft, Samsung, Toshiba, and ZTE. While we do not wish to align ourselves with companies who are directly benefiting from the use of exploited labour, we understand that the occurrence of modern slavery is complex, hidden, and challenging to address.

As a part of the due diligence process, we have identified that the most likely risk of exposure to Modern Slavery Act breaches to be via third-line supply chain partners of our primary Australian suppliers. This could arise where G. James is sourcing materials and/or services from Australian-based companies who in turn directly source these goods and/or services from overseas – particularly from developing countries where human rights violations and/or other employment related breaches may not actively be policed or punished.

Actions taken to mitigate the risk to Modern Slavery

As a national company with a global supply chain, ensuring responsible conduct is important throughout the G. James value chain. We must consider our impact on society – spanning from manufacture to divestment, as well as the exposure to corruption and human rights violations within our own operations and supply chain. During the reporting period, we engaged a strategy to mitigate these risks by strengthening due diligence and risk mapping procedures, while training staff on Modern Slavery. Furthermore, we exclude ourselves from trade with countries subject to trade and economic sanctions to limit exposure to risk.

Over the past 6 years - following the creation of the Group Procurement department - G. James has made a concerted effort to put in place formal supply agreements with its main suppliers to clearly articulate the obligations of both parties in the supplier-customer relationships. These agreements deal with among other things the obligation for suppliers to adhere to all laws, regulations and awards relating to their employee's remuneration and safety. It is the expectation of our employees that all persons acting on behalf of G. James comply with applicable laws and regulations in which they are conducting business. Moving forward, G. James has recognised a requirement to further develop our supply agreements to recognise the Modern Slavery Act as an essential term of any agreement and to enforce the obligation for G. James' suppliers to require the same undertakings from their suppliers and supply chain. In addition to this, G. James will move to improve our adherence to the Act by administering specific Mandatory Slavery Act surveys and declarations to all Tier One suppliers to further establish whether any other potential exposures exist within our group.

We are committed to respecting and supporting the human rights of all individuals potentially affected directly or indirectly by our operations, including modern slavery.

G. James supplier and business partner requirements regarding social and environmental responsibility are, as stated in our procedures, an integral part of all stages of the procurement process. The requirements cover issues related to human rights, anti-corruption and bribery, and working conditions.

The requirements are set out in several G. James policy documents to be read in conjunction with each other – 'G. James Procurement Policy Statement', 'G. James External Supplier/Provider Policy Statement' and, the 'Ethical Sourcing Policy Statement.' These documents will be updated in 2021 to reflect changes to relevant legislation and G. James commitments to human rights. In addition to these, G. James applies the principles of these policies in contractual clauses, Key Performance Indicators (KPI's) and supplier selection criteria to ensure suppliers and business partners reflect the values and principles that G. James promotes internally and externally.

While we have these policies in place, G. James did not have mechanisms in place to adequately assess the effectiveness of these measures during the specified reporting period.



G.JAMES

Grievance - or complaint - mechanisms are important to understand the impact of G.James' operations on the rights of individuals and groups affected by our operations. Grievances of any kind, including social and environmental issues, and can be made anonymously. In situations where we identify adverse human rights impacts, we work to mitigate, prevent, address and remedy potential adverse impacts as recommended in the UN guiding principles on Business and Human Rights. G.James will not tolerate retaliation against anyone who speaks up in good faith to ask a question, raise a concern, reports a suspected violation, or participates in an internal company investigation. We have several grievance mechanisms depending on stakeholder groups.

G.James' framework for human rights management, risk mapping procedures and strengthening of due diligence procedures will remain on a continuous improvement basis through to 2021.

Training, capacity building and responsible behaviour

Human rights responsibilities are an influencing factor in G.James' Conditions of Employment, and policies related to external suppliers/providers. Training on these conditions is offered to all employees, with additional training offered to functions involved in procurement and social responsibility on a regular basis. All policies and statements are available to all employees.

An important contribution toward respecting human rights is to secure decent working conditions in our organisation and promote the same standards in jointly operated companies, and with our suppliers.

All documents listed under references below are also valid for the G.James Trading Group of Companies subject to the Modern Slavery Act 2018. Several G.James Policy Documents are relevant for our work against modern slavery. These include, but are not limited to:

- POL.A11.02 Procurement Policy Statement
- POL.A12.02 External Supplier/Provider Policy Statement
- POL.A13.02 Ethical Sourcing Policy Statement
- G.James Conditions of Employment
- G.James Workplace Health & Safety Handbook

Should there be any queries with any of the information included herein, please refer to our Managing Director Mr. Lewis Saragossi (lewis_saragossi@gjames.com.au).

This statement has been prepared for the G.James Trading Group of Companies and approved by the principle governing body – the Board of Directors of G.James Trading Group Companies, of which the undersigned is Managing Director - on 10th February, 2021.

For and on behalf of:
G.JAMES TRADING GROUP OF COMPANIES

Mr. Lewis Saragossi