



Modern Slavery Statement for Whites Group – Year ended 30 June 2020

Whites Group (ABN 25 008 645) is a wholesaler and manufacturer of hardware, rural and industrial goods. It operates six distribution centres across Australia and a manufacturing plant in Albury NSW. Whites Group sells products to a diverse range of resellers across Australia. Our supply chain network includes both our own facility and in excess of 50 factories primarily in China, Vietnam and Spain. Raw materials generally also originate in these countries. Whites Group is owned by Tolranga Pty Ltd which acts only as a holding company and does not have any outward facing operations.

Whites Group opposes modern slavery and in this statement outlines our approach to minimising the risk of modern slavery in our business or its supply chains.

Governance of Modern Slavery

Whites Group has set up a number of measures in respect to modern slavery:

a) Supplier Code of Conduct

Whites Group has developed a Supplier Code of Conduct which sets out clear parameters as to the expectations and requirements of suppliers which includes framework regarding Modern Slavery. This will be finalised in the coming financial year.

b) Audit system

Our key suppliers are subject to external audits by accredited agencies such as SEDEX and BSCI to ensure compliance with our policy and legislation. Other suppliers are subject to internal audits conducted by our partner China Office to ensure compliance to the policy.

c) Training

The Executive and the Directors of Whites Group have received training in the legislation and Whites policy with respect to Modern Slavery. Whites Group will revise the employee code of conduct to include reference to Modern Slavery and will also train all relevant staff in the coming financial year.

Monitoring of Modern Slavery ongoing

Whites Group has set up the following steps to monitor the effectiveness of governance

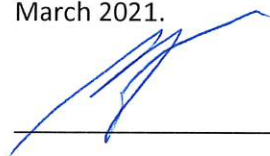
- Review of audits from suppliers and appropriate follows ups
- Spot checks on suppliers with physical visits either by Whites staff or our partner China Office
- Regular communications and reviews with suppliers, including a commitment to the Whites Group Supplier Code of Conduct



Our Commitment

The Directors have a strong intent to combat Modern Slavery in all its forms and are committed to meeting our obligations under the Australian Modern Day Slavery Act 2018.

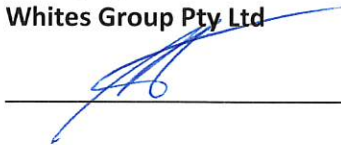
This statement was approved by the Board of Whites Group and its holding company Tolranga on the 23rd March 2021.



Date 23 / 3 / 21

Michael Kelly

**Managing Director
Whites Group Pty Ltd**



Date 23 / 3 / 21

Michael Kelly

**Director
Tolranga Pty Ltd**