



JANDS | AUDIO
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MODERN SLAVERY STATEMENT 19/20



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 is the first Modern Slavery Statement made by Jands. It covers the reporting period ending on the 30 June 2020 for Financial Year 2019 -2020.

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).

Modern slavery

The term "modern slavery" covers a range of serious human rights violations. The following activities may be categorized as modern slavery:

- human trafficking,
- slavery,
- servitude,
- forced labour,
- debt bondage,
- forced marriage, and
- the worst forms of child labour.

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.

Jands Business and Supply Chain

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 are manufactured in the Asia Pacific region, Europe, America, Canada or Mexico.



Modern Slavery Compliance Program

As initial action, Jands have 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.

Design, Assessment and Mitigation.

In 2021, Jands have completed the following activities:

- A. **Design** – Development of Jands Modern Slavery Risk Management Framework
- B. **Assessment** – Issue of Jands first 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.

Actions

Jands is in the process of reviewing our supplier Survey responses to expand on identification and documentation of key areas of risk. Next steps include:

1. Work with our supply chain to map the geographic locations and products and services sourced.
2. Where appropriate, as informed by the Assessment, Jands will engage directly with new and existing suppliers in respect of their responses to the Survey to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.
3. 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.
4. Jands will continue to undertake and build on a training and education program, both to internal staff and with suppliers.
5. 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.



As this is Jands inaugural statement, the ongoing elements of our Modern Slavery Strategy are a work-in-progress which will in the first instance tackle identified categories of highest risk and progressively working our way through identified lower risk issues in the spirit of continuous improvement.

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 is aligning its expectations to industry standards through supplier documents to include a review process for relevant 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 behaviour 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.



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Other (COVID-19)

COVID-19 has had a significant impact across the world and Jands has been subject to the challenges that COVID-19 produced. Jands has followed all state and federal government requirements to protect our employees and customers during the lockdowns.

At all times, Jands collaborated with our suppliers to achieve mutually beneficial outcomes for both parties and will continue to do so with the lens of reducing the risk of modern slavery activity arising in the event of an economic downturn and supporting our suppliers to minimise such risks.

Remediation, Monitor & Review and Report

Considering our Survey activities Jands has a focus on further developing the systems it has in place for ensuring ethical sourcing going forward. 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 notes 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.

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

Paul Mulholland
Chairman