



## MODERN SLAVERY STATEMENT 2021

### 1. Introduction

This statement, made pursuant to section 14 of the Modern Slavery Act 2018 (Cth), is published on behalf of Ironman 4x4 Pty Ltd. The purpose of this statement is to outline our approach to ensuring that Ironman 4x4 has comprehensive frameworks and processes in place to minimise the risks of modern slavery in our business operations and supply chain. Ironman 4x4 acknowledges that slavery can occur in many forms, as detailed in the Act, including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting. Ironman 4x4 is committed to operating responsibly and establishing and adhering to the highest ethical standards with a goal of identifying and working with its supply chain to eradicate the various forms of slavery.

### 2. Our structure, operations and business

In Australia, Ironman 4x4 is a manufacturer and distributor of 4x4 accessories. We have a broad international presence, with offices in the USA, Thailand, South Africa, Middle East and an export network that extends through more than 120 countries worldwide. Ironman's 4x4 head office is in Melbourne, Australia. Ironman 4x4 primary operations are in the distribution of wholesale and retail trade of aftermarket automotive accessories. Ironman 4x4 employs a total of 130 staff in Australia and approximately 140 staff in other countries.

As a large geographical distributor, Ironman 4x4 has a complex supply chain in purchasing raw materials and components from various countries throughout China, South Africa, Vietnam and Thailand.

All finished goods are transported and held in our distribution sites which are located in Thailand, the USA, and Australia, with joint ventures in South Africa and the Middle east. In addition, the finished goods are distributed worldwide through a mix of company-owned distribution centres and authorised distributor retail outlets. The pictorial below represents the flow of inbound in Ironman distribution facilities and the outbound of goods to global retailers and wholesale operations.





### 3. Risk identification

In FY2021, Ironman 4x4 undertook a review of the potential risk of modern slavery practices across our operations and supply chain, considering factors such as industry, product and service type, and geographic location.

As a result of the review, Ironman 4x4 identified some low-risk areas that will likely form part of future assessments and areas on which it should focus its immediate efforts, including major suppliers, field services suppliers, and services currently delivered overseas. Our review also revealed limitations in the data captured and recorded on some of our suppliers. We will use these results to prioritise our supplier engagement activities next financial year.

### 4. Risk management and due diligence

To manage the risks of modern slavery in our supply chain, Ironman 4x4 will undertake the following measures in FY21/22:

- introduce its first anti-modern slavery statement/policy;
- commence audits of key suppliers via a targeted questionnaire;
- introduce a mandatory questionnaire to new suppliers to enable initial risk assessment;
- expand its vendor registration processes to capture and record more information about the individual suppliers;
- introduce a Supplier Code of Conduct; and
- develop a plan to educate its staff on the impacts and risks of modern slavery through an internal training program.

### 5. Ongoing assessment of risk

In the years to come, Ironman 4x4 will increase collaboration with internal and external stakeholders to prevent and address any contribution that Ironman 4x4 may have to the global issue of modern slavery. Ironman 4x4 will achieve this by focusing on raising awareness of the forms of modern slavery among our employees and suppliers, continuing to evolve our due diligence processes to aid in the identification of risks, expanding the scope of our supply chain risk assessment, reviewing existing processes and exploring ways to improve identification and action on risks throughout our supply chain.

This statement was approved by the Board of Ironman 4x4 Pty Ltd on 22 September 2021.

Tom Jacob  
Director of the Board