



**Glen Dimplex Australia – Ethical Sourcing & Modern Slavery Statement**

## **Reporting Entity**

This statement is made on behalf of Glen Dimplex Australia Proprietary Limited ("GDA") pursuant to The Commonwealth Modern Slavery Act 2018 (the Act) entered into force on 1 January 2019 and constitutes its slavery and human trafficking statement.

GDA is a limited company registered in Victoria, Australia (ABN 69 118 275 460).

## **Introduction from the Chief Executive Officer**

As a key manufacturer and provider in the domestic appliance sector, we always work to the highest ethical standards and ensure that we comply with all laws, regulations and rules that are relevant to our business.


Slavery and human trafficking are totally unacceptable and we will not tolerate forced labour of any description within our business or in our supply chains. We recognise our moral and legal responsibility to help prevent modern slavery and human trafficking and commit to taking robust and effective steps to ensure no such activities arise in the operation of our business.

The aim of the business is to achieve the highest ethical standards in this regard and as a minimum, we will comply with all relevant legislation. We all have a responsibility to be alert to the risks of modern slavery and human trafficking, however small, in all daily activities. With that in mind, all employees are expected to report to management any concerns they may have in this regard and managers are expected to act upon any concerns raised without delay.

This statement sets out the action we have taken to identify, understand and address all risk of modern slavery and human trafficking in our own business and in our supply chains.

## **Organisational Structure, Operations and Supply Chains**

Glen Dimplex Australia (GDA) headquartered in Scoresby, Melbourne, is the Australian Trading Entity of the Glen Dimplex Group (GD), Headquartered in Ireland.



GDA is structured as a wholly owned subsidiary of Glen Dimplex Group, incorporated in Australia, and owns no subsidiary entities. GDA has approximately 200 employees.

GDA is a manufacturer and importer of domestic appliances. We manufacture Gas and Wood Heaters in our facilities in Scoresby, Victoria, and Dry Creek, South Australia.

GDA is also an importer and reseller of many medium and small domestic appliances from both GD affiliates and third-party suppliers overseas, including but not limited to ovens, fridges, freezers, dishwashers, washing machines, water heaters, microwaves, toasters, kettles, fans, electric heaters, and air conditioners for distribution to customers in Australia. We also buy spare parts and components for use at our manufacturing sites and in support of our products in the field. Our current supply chains operate across Australia, New Zealand, Europe and Asia.

GDA maintains a network of self-managed and 3PL contracted distribution centres throughout Australia, supporting deliveries to retailers, builders and direct to consumers.

GDA's supply chains include services that contribute to its operations, such as local suppliers, service providers such as 3PL logistics providers, cleaning and security companies that service GDA's sites.

## **Risks Identification of Modern Slavery Practices in Operations and Supply Chain**

GDA in conjunction with Glen Dimplex Group elements, maintains a risk management framework in relation to modern slavery and ethical sourcing risks. It encompasses monitoring compliance with legislative obligations, as well as evaluation of sourcing processes and procurement activities as they relate to modern slavery risks. Ongoing education of relevant personnel is conducted to aid in the identification and reporting of modern slavery practices.


Of most specific concern, GDA has identified its procurement of products from overseas OEM suppliers, particularly out of China as a key risk area in regards to ethical sourcing and modern slavery concerns. This risk could manifest directly in these OEM's own labour practices, or indirectly through the labour practices entities in their downstream supply chains.

## **Actions Taken to Address Modern Slavery Risks**

All Tier 1 Suppliers are signatories to the Glen Dimplex Code of Business Ethics and Conduct. GDA in coordination with Glen Dimplex Group elements undertakes an annual ethical sourcing and modern slavery audit and establishes corrective action plans with all Tier 1 Suppliers. The ongoing status of the Audit program is reported to the GDA Executive Committee.

## **Responsibility**



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- **Overall:** The General Manager Supply Chain and Operations has been appointed as the key contact for issues relating to modern slavery and human trafficking within its Australian operation and related supply chain.
  - **Policies:** It is the responsibility of the Supply Chain and Operations Departments to ensure that relevant policies are in place for the areas of the business that are at risk of coming into contact with slavery or human trafficking. They are also responsible for ensuring that the policies are periodically reviewed and, when appropriate, updated.
  - **Risk assessments:** GDA in coordination with Glen Dimplex Hong Kong, and Glen Dimplex Group Headquarters is responsible for carrying out modern slavery and human trafficking risk analysis.

## Due Diligence

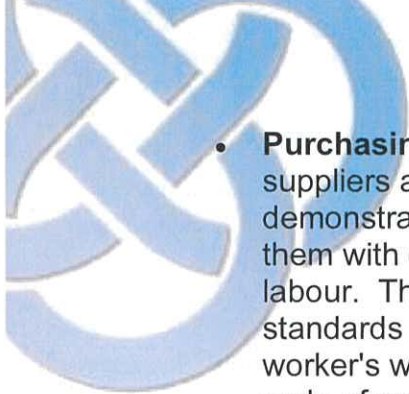
As part of the business' initiative to identify and mitigate risk, it will undertake due diligence when considering taking on new suppliers and regularly review our existing suppliers against the same criteria. The due diligence and reviews include:

- Assessing whether or not particular activities, countries or regions are high risk in relation to slavery or human trafficking by conducting supplier audits or assessments. As part of the routine audit we take into account a number of factors, including the ages of the workers employed by the supplier and their working conditions;
- Taking steps to improve substandard suppliers' practices, including the provision of advice to suppliers through the audit process and face to face meetings on their premises;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship;
- In addition, suppliers are requested to confirm in writing that they shall adhere to the Code of Business Ethics and Conduct.

## Policies

GDA has in place the following policies that sets out its approach to the identification and prevention of modern slavery and human trafficking within the business and its supply chains.

- **Modern Slavery Policy:** The policy reflects the business' commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- **Whistleblowing Policy:** The business encourages all employees, workers, customers and other business partners to report any concerns related to activities within the business or in its supply chains. This includes any circumstances that may give rise to an increased risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Anyone who has a concern can contact our HR Director on a direct number which is included in the Whistleblowing Policy.

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- **Purchasing Code of Conduct:** The business is committed to ensuring that suppliers adhere to the highest ethical standards. Suppliers are required to demonstrate that they provide their workers with safe working conditions, treat them with dignity and respect, and act ethically and within the law in their use of labour. The business will work with suppliers to ensure that they meet the standards of the code and, where necessary, work with them to improve their worker's working conditions. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship (as described in the Glen Dimplex Code of Business Ethics and Conduct).
  - **GDA Code of Business Ethics and Conduct:** The Code sets out the standard of ethical conduct we expect from suppliers. All suppliers are expected to sign up to the Code and to ensure that they comply with it. The Code also sets out the implications for a supplier of acting in breach, including termination of the business relationship.
  - **Anti-Bribery Policy:** The business will act in accordance with its obligation under all relevant Anti-Bribery legislation to prevent and prohibit bribery and to ensuring that the highest standards of professional ethical conduct are maintained.
  - **Agency Workers:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

### **Training and Raising Awareness**

The business requires that all key staff within our supply chain complete training on modern slavery to ensure that they understand the risks of modern slavery and human trafficking infiltrating the business or its suppliers. The organisation will continue to raise awareness via various communication methods including displaying posters and circulating emails. Additionally, we periodically review internal policies and procedures and will, in particular, review them in the event of any major organisational changes, the introduction of new legislation or in the event of any breach of the policy.

### **Effectiveness of Actions Taken**

In order to measure the business' effectiveness in ensuring that modern slavery and human trafficking is not taking place within the business or supply chains, we have:

- Reviewed the training programmes which are being undertaken within the Supply Chain and will carry out periodic reviews in line with our training calendar
- Developed a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Conducted a review of its existing supply chains, whereby the organisation has evaluated all existing Tier 1 suppliers.





## Process of Consultation with Controlled Entities

GDA oversees no controlled entities.

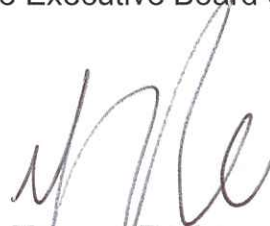
### Signatories

This document has been reviewed and approved by the Executive Committee of Glen Dimplex Australia and its principal governing body, the Executive Board of Glen Dimplex Group.



**David Woodward**  
Glen Dimplex Australia  
Chief Executive Officer  
Company Director

Dec 2021



**Yvonne Burke**  
Glen Dimplex Group  
Chief Financial Officer  
Company Director

Dec 2021