

Modern Slavery Statement – Reporting period commencing 1 January 2022

Hurford Wholesale Pty Ltd has prepared this joint statement in accordance with *The Modern Slavery Act 2018* (the Act) and aims to outline the actions Hurford Wholesale Pty Ltd have taken and continue to undertake to prevent modern slavery within the company's operations and supply chains.

Hurford Wholesale Pty Ltd (hereinafter Hurford's) is a medium size privately-owned company, founded in Australia. Hurford Wholesale Pty Ltd is the parent company to ten subsidiary entities. Three of which are reporting entities in Australia (two holding company's); one is based in New Zealand, two in the USA and two in France. Hurford's reporting entities are Complete Floors Australia Pty Ltd, Jules Baxter Pty Ltd and The Tile Company Pty Ltd.

Hurford's primary operations include purchasing, processing, sales and distribution of wood, tile and building products both domestically and globally. The company directly employs 120 workers within its national operations and outsources work to logistics providers, cleaning services, trades contractors, labour hire agencies and processing facilities.

The company's international supply chains span across multiple countries including USA, France, New Zealand, Malaysia, Japan, Indonesia, Solomon Islands, China, India, Thailand, Italy, Spain and Turkey.

Australia ranks low in vulnerability to modern slavery globally, but modern slavery does persist largely due to systemic discrimination against migrants and minority groups. Hurford's has identified modern slavery is more likely to occur within the contracted companies it utilises but does not have direct control over. This may only constitute to a very small part of Hurford's overall approach to engaging personnel, however the company does have controls in place to help mitigate risks of modern slavery in the operations.

Hurford's ensures all employees are employed in accordance with the Fair Work Act 2009, the relevant Award and/or enterprise agreement (where applicable). There are policies, procedures, and training in place to cover fair work, safety and grievance resolution for all existing and prospective employees, contractors, agents, and visitors of the company.

While modern slavery risks can be present in any country, it's important to note that the specific risks and prevalence of modern slavery can vary across different nations. In Hurford's initial scoping exercise, the primary focus was on two industries: timber and tile. The exercise entailed a comprehensive review of each country within these industries, specifically examining the sourcing of raw materials and the manufacturing sectors. The findings revealed that the key risks associated with modern slavery in the mentioned countries revolved around the exploitation of migrant workers and human trafficking. These themes were consistently identified across the board. The risks associated with the sourcing and manufacturing processes in these industries encompassed forced labour, debt bondage, and substandard working conditions.

Hurford's procurement team actively engages with international suppliers through a hands-on approach. This includes conducting onsite visits to supplier facilities whenever feasible and organising meetings at Hurford's headquarters on the Gold Coast Australia. These initial visits play a crucial role in evaluating various aspects such as overall conditions, safety measures, and working conditions provided to the factory workers. Although Hurford's faced limitations in conducting some

inspections during the reporting period due to the impact of COVID-19, the company has plans to resume international visits once the restrictions are lifted.

Subsequently, the team then carry out a thorough due diligence check on the supplier and their products. This process begins with the supplier completing a questionnaire and providing evidence of compliance and the Hurford's compliance team making an assessment. While the questionnaire has traditionally focused on verifying adherence to logging and other relevant laws, Hurford's will now require suppliers to provide detailed information on their labour practices, as well as their policies and procedures concerning modern slavery. Additionally, onsite visits to supplier facilities will place a greater emphasis on evaluating modern slavery practices.

Hurford's is committed to assessing the effectiveness of its actions toward identifying risks of modern slavery in its local operations and its domestic and international supply chains. The company will strive to establish clear policy, conduct thorough risk assessments, engage with suppliers, conduct regular audits, monitor data, foster collaborations, promote continuous improvement, ensure transparency through reporting, and provide comprehensive training and awareness programs.

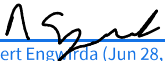
In the next reporting period, Hurfords will undertake the following actions:

- Update existing supplier questionnaire to include assessments on modern slavery practices
- Ensure visits to supplier facilities have a specific focus on evaluating modern slavery practices
- Revisit existing policies and procedures to include how the company assesses and addresses risks of modern slavery in its operations and supply chains
- Consult with senior management and the board to develop a comprehensive code of conduct and a supplier code of conduct
- Educate employees on Modern Slavery and provide updates on company policy

Hurford's will continuously improve its approach to mitigate risks, protect human rights, and contribute to a fair and ethical global supply chain.

This statement for Hurford Wholesale Pty Ltd was approved by the board of Hurford Wholesale Pty Ltd in their capacity as the parent entity on 28 June 2023.

This statement is signed by Bob Engwirda in his role as the Chief Executive Officer of Hurford Wholesale Pty Ltd on 28 June 2023.


[Robert Engwirda \(Jun 28, 2023 13:16 GMT+10\)](#)

Bob Engwirda
Chief Executive Officer
Hurford Wholesale Pty Ltd