

## MODERN SLAVERY STATEMENT

### NEWFURN FLOOR COVERINGS LIMITED

This Modern Slavery Statement (**Statement**) has been prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). The statement sets out the actions taken by Newfurn Floor Coverings Ltd and its related entities (collectively, the **Company**) to address modern slavery risks and ensure responsible and transparent practices within its business and supply chains.

### Principles

The Company rejects modern slavery in all its forms.

The Company wants the flooring industry to be sustainable. Modern slavery is unlawful within Australia, and the Company is committed to protecting the health, safety, and wellbeing of its people, and to implementing and enforcing effective systems and controls to reduce the risk of modern slavery in its business and supply chains.

### Our Structure

The Company is an Australian Public Company Limited by Shares. The Company is incorporated in Australia and headquartered in Rowville, Victoria. The Company owns various subsidiaries, including:

- **Newfurn Floor Coverings Limited**, under which the Parent Company carries on business in Australia/NZ relevant to the group.
- **Choices Flooring**, under which the Company carries on business in Australia relevant to the group.
- **Choices Flooring Limited**, which is the Company's New Zealand entity which carries on the Choices Flooring brand in New Zealand.
- **Newfurn Training Academy**, under which the Company carries on business in Australia relevant to the group.
- **The Wool Set Pty Ltd**, is a wholly owned subsidiary of the Company and carries on an independent floor covering wholesaling business unrelated to the Choices Flooring brand.
- **Newfurn Property Group**
- **CTI Training** - CTI is a Newfurn LTD trademark Enterprise Registered Training Organisation (RTO) who deliver high quality accredited on-the-job training and micro-credentialling for our Choices and Style membership. Our trademarked training model focusses on best practice and high-quality Industry standards. CTI offer the national training qualification in MSF30818 Certificate III in Flooring Technology.

## Background

- The Company has been operating in Australia since 1959.
- The Company consists of a Board of Directors which includes 6 sitting members and a Chairman. The Board of Directors is made up from members of Choices Flooring group, elected by members at Annual General Meeting.
- The Company's Current Directors are:
 

○ Shane Chillingworth	Chairman
○ Rod Preston	Director
○ Gemma Binning	Director
○ Lincoln Smith	Director
○ Scott Shearer	Director
○ Graham Meecham	Director
○ Mark Winterton	Director
- The Executive Team consists of the CEO, CFO and four Group Managers, namely:
 

○ Andrew Lewis	CEO
○ Helen Nguyen	CFO
○ Terry Triggs	GM – Product
○ Tim Drew	GM Retail Development Australia
○ Jason Verstak	GM Marketing
○ Andrew Verstak	GM Style Flooring & Interiors
○ John Nicholls	GM Retail Development NZ
○ Simon Lovett	RTO Manager
- The company operates under the following logos:



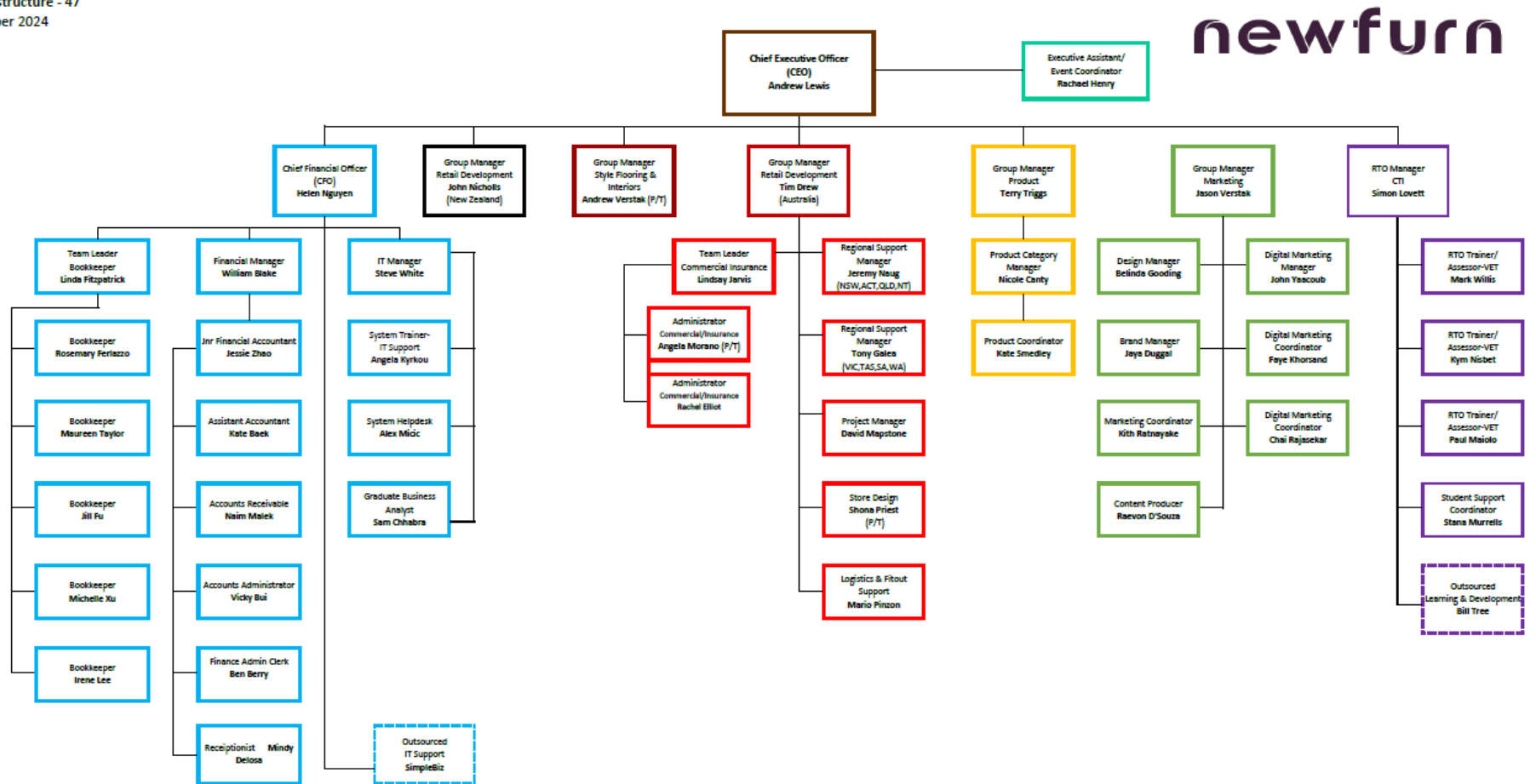
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PROPERTY

The company's organisation chart is as follows including Shareholders and Directors, with a complement of 51 staff reporting to Head Office.

staff structure - 47  
October 2024



## Our Operations

### Key activities

The Company is the parent of the Choices Flooring branded chain of floor covering retail stores across Australia and New Zealand. Choices Flooring Retailers specialise in the supply and installation of Carpets, Timber, Laminates, and resilient finishes in both residential and commercial settings and operate under the co-operative model.

The Company supplies all the product used by the Choices Flooring retailers via their Alliance partner suppliers. All Choices Flooring Retailers must only supply and install products that have been approved as a preferred supplier product under the Newfurn Membership Agreement, which must be signed by all members.

The Company has a turnover of approximately \$193 million. When combined with Choices Flooring retail sales, the Company's turnover is approximately \$732 million.

The Company also operates the Chillingworth Training Institute (**Academy**) which is a specialist training provider for the floor covering industry. The Academy offers an Apprenticeship Program for new flooring installers, Trade Card accreditation for experienced flooring installers and Master Class professional development opportunities for flooring installers, workplace trainers, sales consultants and store owners.

## Areas of operation

The Company's key areas of operation are

- Building Industry, including
  - Residential
  - Commercial
  - Municipal, and
  - Industrial
- Insurance Industry
- Media, Marketing, and advertising
- Digital solutions
- Training administrative support

The Company's operations are focused predominantly in Australia and New Zealand, with the head office team based in Rowville, Victoria, Australia.

## Workforce

The Company employs approximately 51 employees, with the majority being in Australia. The Company's employees are based at the following locations:

• Rowville, Victoria, Australia	43	employees
• Sydney, New South Wales, Australia	2	employee
• Busselton, Western Australia, Australia	1	employee
• Hamilton, New Zealand	1	employee

The Company also engages the following independent contractors:

SimpleBiz	IT Provider	engaged directly by Newfurn
Concepture	IT Developer	engaged directly by Newfurn
Bill Tree	Apprenticeship Training	engaged directly by Newfurn
Prendi	Digital solutions	engaged directly by Newfurn
Advertising Associates	Media Purchasing	engaged directly by Newfurn
Ecomms	Phone Network	engaged directly by Newfurn
Ellis Creative	Digital Marketing	engaged directly by Newfurn
Search Forecast	SEO	engaged directly by Newfurn
Day3	website developers	engaged directly by Newfurn

## Our Supply Chains

Broadly speaking, the Company's supply chains include:

Manufacturer	Product
A1 Rubber	Rubber Flooring
Acoufelt	Carpet tiles
Airlay	Carpet tiles, Vinyl plank and Accessories
Airstep Australia Ltd	Carpet and hard flooring underlays, hard flooring
Ardex Australia	Flooring Adhesives
Armstrong Flooring Pty Ltd	Vinyl planks and tile
Aspect Blinds and Shutters NZ	Window Furnishings
Aussie Floorcovering Dist. P/L	Accessories
Australian Flooring Supplies (AFS)	Accessories
Bayblinds NZ	Window furnishings
Bayliss Rugs	Rugs
Beaulieu of Australia Pty Ltd	Carpet
Belgotex Floors Australia	Carpet
Belgotex NZ	Carpet
Betta Blinds and Awnings	Window
Bostik	Adhesives
Brady Tiles	Tiles
Bremworth Ltd NZ	Carpet
Bremworth Pty Ltd	Carpet
Brinton's Pty Ltd	Carpet
Complete Floors Australia	Hard Flooring
CW Systems	Window Furnishings
Down Under Turf	Artificial grass
DTA Australia Pty Ltd	Accessories
Dunlop Flooring	Hard Flooring and Underlay
Dunlop Flooring NZ	Underlay
DW Tiles	Tiles
EC Carpets	Carpets
Feltex Australia Pty Ltd	Carpet
Flooring Distributors of Aust Pty Ltd	Resilient
Floors of Tasmania	
Floorscape Limited NZ	Hard Flooring
Forbo Floorcoverings Pty Ltd	Resilient
Furtex Limited NZ	Rugs
George Low of Melbourne	Carpet / Resilient / Accessories

Manufacturer	Product
A1 Rubber	Rubber Flooring
Gerflor Australasia	Resilient
Gilt Edge Industries NZ	Accessories
Godfrey Hirst Australia Pty Ltd	Carpet
Hurford Wholesale Limited NZ	Hard Flooring
Inspired Floorcoverings	Carpet Tiles & Vinyl Tiles
Interface Aust Pty Limited	Carpet Tiles
Intex Concepts NZ	Window Furnishings
Jacobsen Holdings Limited NZ	Carpet, Resilient
Karndean Australia Pty Ltd	Resilient
Karndean International Ltd NZ	Resilient
Kenbrock Flooring Pty Ltd	Resilient
Lifestyle Blinds & Shutters	Window Furnishings
Manag Distributors Pty Ltd	Carpet / Resilient / Accessories
Mapei Australia	Accessories
MBP (NZ) Limited NZ	Accessories
Milliken (Australia) Pty Ltd	Carpet Tiles
MJS Floorcoverings	Hard Flooring / Resilient / Accessories
National Flooring Distributors	Vinyl plank / Carpet Tiles/ Accessories
New Zealand Comfort Group NZ	Underlay
Newton Ceramic Centre	Tiles
Osborne Ceramic Centre	Tiles
Pegulan Floor Coverings (Commercial)	Resilient
Polyflor Australia Pty Ltd	Resilient
Polyflor New Zealand Limited NZ	Resilient
Premium Floors Pty Ltd	Hard Flooring
Proline Floors	Hard Flooring / Resilient
Protecta Group Australia	Accessories
Quest Carpet Manufacturers Pty Ltd	Carpet
Robert Malcolm Limited NZ	Carpet / Carpet Tiles / Resilient
Santa Fe Shutters NZ	Window furnishings
Signature Floorcoverings Pty Ltd	Carpet / Carpet Tiles / Hard Flooring / Resilient
Signature Floorcoverings Pty NZ	Carpet / Carpet Tiles / Hard Flooring / Resilient
Sunstar	Hard Flooring
Tarkett Australia Pty Ltd	Resilient
Tile Mart (Vic) Pty Ltd	Tiles
Total Window Concepts	Window Furnishings
Tuftmaster Carpets Pty Ltd	Carpet
Uniline NZ Ltd NZ	Window Furnishings
United Ceramic Imports	Tiles
Unitex International	Rugs
Victoria Carpet Co Pty Ltd	Carpet
Victoria Carpet Co Pty Ltd NZ	Carpet
Victorian Independent Flooring	Accessories
Warwick Fabrics (Australia) Pty Ltd	Rugs
Woodland Lifestyle NZ	Hard Flooring
Wools of New Zealand	Carpet

The Company's direct supply chains are based in Australia and New Zealand; however, the Company recognises that its suppliers also source key "materials and labour" from countries including:

- China
- United Kingdom
- USA
- France
- Belgium
- South Korea

None of the above suppliers are known by the Company to have engaged in practices that are in breach of Australia's modern slavery legislation.

The Company's supply chains also include services ancillary to its operations, such as:

- Cleaning and security companies that service the Company's offices.
- Garden maintenance servicing for lawns and garden care.
- Filtered water supply.
- Bathroom services.

## Modern slavery risk assessment

The identification of modern slavery risks in the Company's operations and supply chains is a primary concern for the Company. The Company's commitment to its Modern Slavery Policy and emphasis on human rights compliance is a key focus for the Company, together with its continued and sustained commitment to adhering to the principles and obligations under the Modern Slavery Act.

Given the size and mature nature of the Australian and New Zealand markets in which the Company operates, the Company considers the risk of exposure to modern slavery within its business and supply chains to be low. However, the Company remains alert to such risks and is consistently verifying and auditing its suppliers with a view to addressing such risks, should they arise.

The Company's supplier agreements require suppliers to comply with all applicable laws, including the Modern Slavery Act, and requires suppliers to agree that they have not, to their knowledge, sourced materials from suppliers that have participated in conduct constituting modern slavery and/or human trafficking.

The Company's employees are advised to pay particular attention to suppliers that provide products and or services from higher risk areas and must immediately report any concerns to the relevant Executive Manager, who is required to promptly investigate and take appropriate action in relation to such reports.

The Company has developed a number of policies that are designed to combat any unethical conduct within its business and supply. These policies include, but are not limited to:

- Modern Slavery Policy;
- Whistleblower Policy;
- ISO27001 Complaint Information Security Management Systems;
- Conflict of Interest Policy; and
- Equal Opportunity and Anti-Discrimination Policy.

The Company expects its suppliers to share its commitment to human rights and its zero-tolerance approach to modern slavery. The use of forced or slave labour, whether in the form of indentured, bonded or prison labour, by any entity within the Company's business and supply chain is prohibited. Additionally, support of human trafficking of involuntary labour through threat, force, fraudulent claims, or any other form of coercion is also prohibited. Where it is found that a supplier has breached this expectation, the Company will terminate its relationship with that supplier.

The Company also expects its suppliers to comply with its Code of Ethics.

The Company is committed to continually monitoring and reviewing its policies and procedures to prevent any form of modern-day slavery and/or human trafficking from occurring in its business or supply chain.

## Sector and industry risks

The Company operates predominantly in the retail and construction sector, which is interlinked with certain risks. Through its policies and corporate obligations, the Company has identified the following areas in its operations and supply chains that may pose risks:

- labour rights, including forced or compulsory labour, wages and benefits, work hours and child labour (including unskilled, temporary or seasonal labour));
- health and safety (for workers that the Company does not control (or who are otherwise engaged in operations outside of the Company's control)); and
- unauthorised subcontracting;
- sham contracting;
- underpayment of wages;
- consistent and excessive overtime;
- the use of migrant, low-skilled workers;
- temporary labour contracts; and/or
- lack of access to effective grievance mechanisms.

## Product and services risk

The Company has identified certain risks associated with the products and services it relies upon. Specifically, the Company has identified the following risks in relation to its products and services:

- Fraudulent claims of compliance

## Geographic risks

The Company's commitment to delivering floor coverings involves certain 'geographic risks' to modern slavery practices. The Company understands that the countries in which it operates and/or sources products and services may not be subject to the modern slavery standards that apply in Australia. In this regard, the Company identifies the following risks:

- Third party providers to the supply chain of vetted partners

## Actions taken to address modern slavery risks

In response to the risks outlined above, the Company is committed to its ISMS-DOC-A15-Alliance Partner Assessment Criteria-12042021. In accordance with this Policy, the Company has:

- Audited each supplier (Alliance Partner) in relation to their commitment to Modern Slavery Act.
- Implemented new signed agreements with suppliers confirming their compliance with the Modern Slavery Act.
- During the process of implementing new supplier agreements, terminated two supplier agreements where the supplier could not guarantee their compliance with the Modern Slavery Act.
- Developed a number of compliance policies designed to combat any unethical business conduct, which it expects its suppliers to comply with, including its Code of Ethics.
- Implemented a Whistleblower Policy to provide adequate protection to employees who make a protected disclosure.
- Implemented a range of policies and procedures, including:



- ISO27001 Complaint Information Security Management Systems; for compliance with employment entitlements.
- ADP management system for compliance with employee entitlements.
- Conflict of Interest Policy.
- Equal Opportunity and Anti-Discrimination Policy.
- Modern Slavery Policy.
- Staff Induction and Security Awareness Training, for all new staff onboarding and current employees.
- Information Security Policy.
- Mobile Devices & Teleworking Policy.
- Acceptable Use Policy.
- Cryptographic controls policy.
- Data security policy.
- Privacy Policy & Statement.
- Employee Handbook (Policies & Procedures) including breach of policies procedure which is updated on a regular basis and provided to all new staff and current employees also including employee entitlements.
  - Visitor, Staff and asset Security.
  - Computer System.
  - Confidential Material – Security.
  - Couriers and Overnight Delivery Services.
  - Outwards Correspondence Procedures.
  - Purchase Order Procedures.
  - Occupational Health & Safety.
  - Equal Opportunity – Anti-Discrimination, Anti-Harassment and Bullying.
  - Internet, Email and Computer Usage Policy – Information Security.
  - Grievance and Complaints Procedure.
  - Travel & Accommodation Policy.
  - Leave Entitlement Policy.
  - Smoking Policy.
  - Electronic cigarettes in workplaces.
  - Conflict of Interest Policy.
  - Evacuation Procedures.

## CONSULTATION PROCESS

The Company is committed to working with non-government organisations, its employees and their representatives, external auditors and its subsidiaries to improve its modern slavery response.

The Company seeks to work alongside its suppliers and employees to ensure it is always aware of modern slavery risks in its supply chain, and to ensure it does not inadvertently engage with modern slavery practices.

Ultimately, measures taken by the Company enable it to adequately address and mitigate the modern slavery risks identified in the Company's operations, supply chains and in its industry.

The Company and its associated entities work in collaboration to ensure the Company's personnel are aware of their obligations under the Modern Slavery Act. The Company currently conducts monthly management meetings with its Executive Team to provide education and training in how to address modern slavery risks. These meetings are attended by representatives from all of the Company's associated entities, and are used to address departmental reports, financials, ISO27001 and Modern Slavery compliance.

The Company is committed to including Modern Slavery compliance as a specific agenda item for all monthly Executive Team meeting moving forward.

In addition, the Company has shared publicly available educational videos with its Executive Team to raise awareness and education among its Team Leaders in relation to Modern Slavery risks and compliance.

## Future Actions to Address Modern Slavery Risks

In the next financial year, the Company has committed to continuing to monitor, assess, and engage with its supply chains to ensure the Company remains compliant with the Modern Slavery Act.

As part of its ISO27001 accreditation, the Company will undertake an annual review of this Modern Slavery Statement.

## Effectiveness of the Company's actions (measurements for Modern Slavery obligations)

The effectiveness of the measures taken by the Company to monitor, assess and eliminate the risk of modern slavery in its business and supply chains is demonstrated by the Company's:

- Review and investigation of its suppliers.
- Renewal of supplier agreements with supplier who have demonstrated a commitment for compliance with the Modern Slavery Act, and the Company's termination of supplier agreements where a commitment has not been demonstrated; and
- Ongoing consultation with those in its supply chain.

In Financial Year 2023-2024, the Company identified zero reported instances of modern slavery breaches in its business and supply chains.

The Company intends to continue working closely with its contractors and suppliers to better understand their business operations and supply chains to avoid any inadvertent engagement with modern slavery practices.

This statement was approved by the Board of the Company for the year ended 04 December 2024.



Shane Chillingworth  
Chairman of the Board



Andrew Lewis  
Chief Executive Officer

Dated: 04 December 2024