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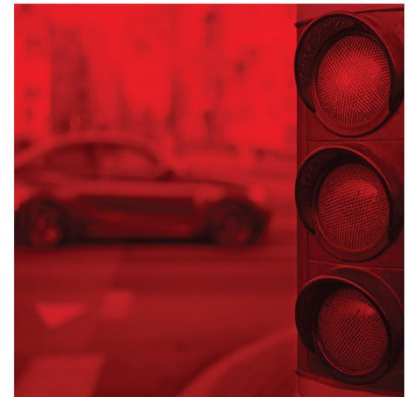
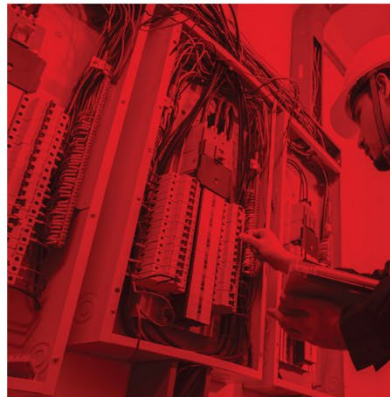
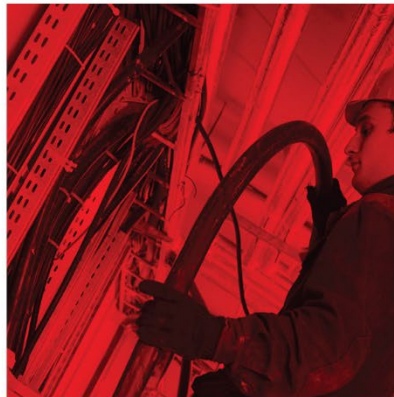
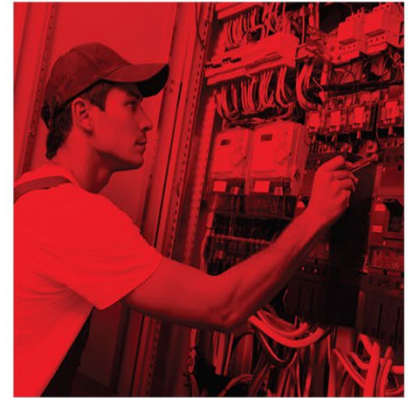
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Electra Cables (Aust.) Pty Ltd

Modern Slavery Statement



Reporting period

1 January 2021 – 31 December 2021

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**The
CABLE
you NEED,
WHEN
you NEED it,
WHERE
you NEED it.**

- **Massive Range:**
One of the widest ranges of products available.
- **Great Stock Holdings:**
Possibly Australia's largest stock holdings.
- **Unrivalled Service:**
Great turnover time guaranteed, including cuts.
- **Quality Certified:**
Over 30 new Certificates of Conformity awarded for various lines since January 2018 alone.



**ELECTRA
CABLES**

(Aust.) Pty Limited

SYDNEY | MELBOURNE | BRISBANE | PERTH

<ul style="list-style-type: none"> • FLAT • XLPE/PVC • CIRCULAR • CONTROL • FLEXES • MAINS • DATA & SECURITY • SPECIALTY CABLES 	
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Foreword

Electra Cables (Aust.) Pty Ltd has been supplying quality electrical and electronic cables to Australian industries and communities for power, lighting, and communication for over 40 years. Electra's cable products have been used in many prestigious buildings and projects throughout Australia and elsewhere around the world.

Electra Cables is committed to operating our business lawfully, ethically, and to working with suppliers that are aligned to our values.

Electra Cables believes that everyone, everywhere has the right to a life free from slavery. We seek to foster a transparent and responsible business environment, where human rights are respected, and workers are treated with dignity and fairness. Our commitment to respect and support human rights is aligned to the UN Guiding Principles on Business and Human Rights. Electra Cables seeks to work alongside like-minded organisations to secure freedom for people in, or vulnerable to, modern slavery.

Electra Cables is pleased to submit its annual Modern Slavery Statement for the reporting year 2021.¹

Principal Governing Body Approval

This statement was approved by the Board of Electra Cables (Aust.) Pty Ltd in their capacity as principal governing body² of Electra Cables (Aust.) Pty Ltd on 7 February 2024.

Signature of Responsible Board Member

This Modern Slavery Statement is signed by Luke Zhou in their role as a responsible member³ of the reporting entity's principal governing body.



Luke Zhou
Deputy Managing Director

15 February 2024

¹ This statement has been re-submitted following earlier submission.

² Section 4 of the *Modern Slavery Act 2018* (Cth) ("the Act") defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

³ Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

1 Reporting entity

- 1.1 The reporting entity covered by this statement is Electra Cables (Aust.) Pty Ltd, Australia (“Electra”, “Electra Cables”), an Australian incorporated entity, with ABN 38 056 024 385, trading as Electra Cables since 12 June 1992.
- 1.2 Electra Cables is a reporting entity under the *Modern Slavery Act 2018* (Cth).
- 1.3 This statement is submitted for the reporting year 1 January 2021 – 31 December 2021.
- 1.4 Electra Cables makes this statement as a single reporting entity in accordance with section 13 of the *Modern Slavery Act 2018* (Cth).

2 Structure, operations and supply chain

2.1 Structure

- 2.1.1 The Australian Government guidance for reporting entities on preparing a modern slavery statement under the *Modern Slavery Act 2018* (Cth) describes the “structure” of the entity as “the legal and organisational form of the entity, including its legal classification (company, trust, partnership etc), number of employees, whether it is part of a larger corporate group of entities, and whether it owns or controls other entities”.⁴
- 2.1.2 Electra Cables is legally classified as an Australian proprietary limited company, incorporated under the *Corporations Act 2001* and registered with ASIC.
- 2.1.3 As of 31 December 2021, Electra directly employed 88 employees.
- 2.1.4 Electra Cables is part of a larger corporate group that includes Elite Cables (Aust) Pty Ltd (“Elite Cables”), Guilin Xin Ao Wire and Cable Co Ltd (“Xin Ao”), and Guilin International Wire & Cable Group Co., Ltd (“Guilin International”).
- 2.1.5 Guilin International and Electra are shareholders in three other cable manufacturing companies.
- 2.1.6 Guilin International, and the other cable manufacturing companies, are Electra’s suppliers.
- 2.1.7 Electra Cables does not own or control any other entities.

⁴ Commonwealth Modern Slavery Act 2018: Guidance for reporting entities, available at: <https://modernslaveryregister.gov.au/resources/>.

2.2 Operations

- 2.2.1 The Australian Government guidance for reporting entities on preparing a modern slavery statement under the *Modern Slavery Act 2018* (Cth) describes the “operations” of the entity as “activity undertaken by the entity to pursue its business objectives and strategy in Australia or overseas”.⁵
- 2.2.2 Electra Cables is an importer and distributor of a large range of electrical and electronic cables, including customised and commodity cables to local users in Australia. Users are mainly wholesalers and distributors of electrical cables.
- 2.2.3 Electra Cables directly employs management, procurement, sales, warehouse, finance, logistics and administration staff that support day-to-day operations.
- 2.2.4 Electra Cables has several facilities (warehouses and offices) located across Australia. These are:
- NSW (Head Office): 1/13 Cooper St, Smithfield NSW 2164
- Victoria: 460–464 Hammond Rd, Dandenong South, VIC 3175
- Queensland: 118 Sandstone Pl, Parkinson, QLD 4115
- Western Australia: 24 Harrison Rd, Forrestfield, WA 6058.
- 2.2.5 Electra Cables has significant environmental credentials that are part of our commitment to ethical business practices and that contribute to making us a trusted and preferred supplier to industry. Electra Cables’ full product range is Greenstar certified. Electra’s product lines use PVC that is in line with Best Environmental Practice PVC guidelines and requirements per the Green Building Council of Australia.

2.3 Supply chains

- 2.3.1 Electra Cables has a strong focus on and oversight of the manufacturing of the products it sources and supply. All Electra Cables products can be traced step by step back to manufacturing facilities within its broader corporate group.
- 2.3.2 The primary physical raw material inputs for Electra Cables’ products are copper rod, aluminium rod, and PVC compounds and resins.
- 2.3.3 Guilin International is centrally responsible for the procurement of the raw materials used for production, both from within China and Australia. Electra Cables is directly involved in the sourcing and supply of some key components for its product lines, such as the PVC compounds and resin, and copper rod from within Australian borders.

⁵ Commonwealth Modern Slavery Act 2018: Guidance for reporting entities, available at: <https://modernslaveryregister.gov.au/resources/> .

- 2.3.4 These manufacturing elements are converted and manufactured into product lines in facilities controlled by Guilin International, located in Guangxi, China. The products are then shipped directly to Electra Cables in Australia. Products are then distributed locally within Australia by Electra.
- 2.3.5 Primary supplier(s) for the production of Electra Cables' products are:
- suppliers of copper rod, aluminium rod, and PVC compounds and resins within Australia and China;
 - entities within the Guilin International group.
- 2.3.6 Services, including labour, that contribute to Electra's products are from Australia and China.
- 2.3.7 The countries in Electra's tier 1 supply chain are China and Australia.
- 2.3.8 Electra Cables' supply chain includes suppliers providing products and services needed for the business' day-to-day operations. This includes logistics, provision of specialised manufacturing products, recycling, office supplies, external legal services, information technology (IT), infrastructure and support services. These goods and services are procured locally in Australia.
- 2.3.9 Electra Cables is also a supplier in the supply chains of other entities. As a distributor of electrical cable products, Electra Cables is a trusted partner and preferred supplier for the building, mining and electrical supply industries and throughout 7 major electrical wholesale buying groups.

3 Potential risks in the operations and supply chains

3.1 Our understanding

- 3.1.1 Modern slavery is depriving a person of freedom for commercial gain and in violation of fundamental human rights.
- 3.1.2 It describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery involves serious exploitation, not sub-standard working conditions or the underpayment of workers although this may be unlawful for other reasons.
- 3.1.3 Modern slavery can be complex and multi-faceted and can be difficult to identify.
- 3.1.4 There are modern slavery risks inherent to all businesses that need to continually be identified, assessed, mitigated and addressed as part of our business commitment to ethical practices that are aligned to our values.

3.2 Risk factors

- 3.2.1 Factors that affect the risks of modern slavery practices in an entity's operations and supply chains include inherent industry or sector risks, geographic risks, and supplier-specific risks.
- 3.2.2 Some sectors or industries are considered to have elevated risks due to factors such as informal or unregulated work, reliance on labour from vulnerable populations such as seasonal or migrant workers, or work that takes place in less visible places or at less visible times. Some sectors or industries are considered to have elevated risks due to a documented association with modern slavery practices.
- 3.2.3 Some geographical regions are reported to have higher risks of modern slavery. Modern slavery practices are more prevalent in areas where there is weak governance or rule of law, lack of enforcement (including of labour laws and regulations), conflict, or displacement.
- 3.2.4 Further, specific suppliers may have elevated risks of modern slavery practices. This may be associated with higher risk business models, including outsourcing and labour-hire where there is less oversight over workers' conditions of service. Some specific suppliers may have documented elevated risks, for example where there are reports of human rights or workers' rights concerns.

3.3 Risks identified in our operations

- 3.3.1 During the 2021 reporting period, Electra Cables conducted a high-level assessment and mapping of the risks of modern slavery practices in its operations as an importer and wholesaler of electrical cables.
- 3.3.2 Electra Cables is not aware of any instances of modern slavery practices within or linked to our direct operations during the reporting period. We are not aware that we caused or contributed to modern slavery practices. However, we acknowledge that there are modern slavery risks inherent to all businesses.
- 3.3.3 Electra's employment contracts comply with the *Fair Work Act 2009* and Electra complies with all aspects of Australian employment law.
- 3.3.4 In recruitment, Electra uses direct hire and recruitment agencies. The recruitment agencies that Electra works with are reputable and subject to Australia's laws and regulations. However, Electra Cables acknowledges it does not have direct oversight over the operations of these recruitment agencies.
- 3.3.5 In relation to service suppliers to support day-to-day operations, such as office cleaning etc., Electra Cables acknowledges it does not have direct oversight of its third-party suppliers, and as such this area of our operations may pose a potential threat of modern slavery practices.
- 3.3.6 A more detailed analysis would assist Electra to understand these operational risks more fully.

3.4 Risks identified in our supply chains

- 3.4.1 Electra Cables has conducted a high-level risk mapping exercise and assessment of potential risks associated with our supply chains.
- 3.4.2 Electra Cables' supply chain is multi-jurisdictional but not as complex or long as some other supply chains.
- 3.4.3 The electrical cables Electra sells are manufactured in facilities in the Guangxi region of China by companies affiliated with Electra Cables. Major inputs are sourced from Australia and China. Services, including labour, that contribute to Electra's products are also from Australia and China.
- 3.4.4 The supply chain is therefore mainly bi-jurisdictional, comprising China and Australia.
- 3.4.5 Electra Cables' sourcing of raw materials in Australia may involve risks that are considered inherent in the raw materials, mining and extractive sectors in all countries.
- 3.4.6 The manufacturing of Electra Cables' products takes place in facilities in the Guangxi region of China. Electra Cables is aware of reports of potential modern slavery practices in some areas of China. In the specific facilities in which Electra Cables' products are manufactured, Electra understands that there is no involvement of prison labour.
- 3.4.7 Based on Electra's knowledge of its affiliated manufacturing entities located in China, these entities have strong governance structures and have a strong record of treating workers well. There is no record of human rights violations. As Electra is aware, all of these manufacturing entities are compliant with local laws and regulations.
- 3.4.8 Based on Electra's knowledge about the manufacturing facilities of the Guilin International group, work conditions are not of concern in terms of modern slavery practices. Several of the Guilin International group's manufacturing facilities were for many years collective worker-owned facilities, and the culture in these facilities have remained focused on high morale and well-being for workers.
- 3.4.9 Following our high-level review of our supply chains and operations, we have identified that our highest modern slavery risks are likely to be within our indirect supply chain (i.e., beyond tier 1). Electra Cables acknowledges that at this stage, it is difficult to assess with accuracy the risks that are present at that level in our indirect supply chain.

4 How Electra Cables assesses and addresses risks

- 4.1.1 Electra Cables recognises the importance of assessing and addressing risks of modern slavery in our operations and supply chains. Electra is committed to taking proactive measures to do so, and continuously improving its efforts.

- 4.2.1 During the reporting period of 1 January 2021 to 31 December 2021, Electra Cables worked on building awareness of modern slavery risks within its operations and supply chains, built further awareness of the modern slavery statement reporting process, and implemented risk assessment practices and management procedures for suppliers. This included:
- taking steps to improve understanding of the Australian modern slavery regulation regime and obligations applying to reporting entities under the Act;
 - determining whether Electra Cables was a reporting entity for the purposes of the Act;
 - briefing senior management on modern slavery risks, the Australian modern slavery regime, and reporting obligations;
 - engaging with key business partners in relation to their modern slavery policies and procedures; and
 - conducting a high-level review of potential risks of modern slavery practices in Electra Cables' operations and supply chains.
- 4.2.2 In particular, during this reporting period Electra Cables reviewed and updated its Supplier Engagement Principles and onboarding processes.
- 4.2.3 Electra Cables conducted a high-level risk assessment of its suppliers prior to contract award and engaged key suppliers based on risk factors.
- 4.2.4 Electra Cables developed a Code of Conduct and Integrity and required Electra Cables' suppliers to comply with this Code.
- 4.2.5 Electra Cables acknowledges that its processes to assess and address modern slavery risks were at an early stage in this reporting period. The actions it takes will continue to develop and evolve over time in line with Electra's commitment to continuous improvement, and will incorporate risk assessment, due diligence, supplier engagement, training and awareness-raising, risk mitigation measures, and any remediation processes that may become applicable.

5 Assessing the effectiveness of actions and policies

5.1 Assessment of effectiveness

- 5.1.1 Electra Cables understands the importance of measuring our progress and continuously improving our efforts to address risks of modern slavery practices in our operations and supply chains. By evaluating the effectiveness of our efforts, we can ensure the actions we are taking are able to drive positive change and make a positive impact in the fight against modern slavery.
- 5.1.2 During this reporting period, Electra Cables focused on gaining further understanding of modern slavery risks and how such risks may be present in our operations and supply chains. Electra acknowledges that its processes to assess and address modern slavery risks in its operations and supply chain will continue to develop over time, in line with its commitment to continuous improvement, which will extend to its frameworks to assess the effectiveness of actions taken.

5.1.3 We have commenced and will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

6 Consultation with other entities

6.1 Electra Cables does not own or control any other entities. Electra Cables is a minority shareholder in several affiliated companies that are the subsidiaries of Guilin International. Electra Cables has undertaken enquiries and consultation with Guilin International.

7 Commitments for continued improvements

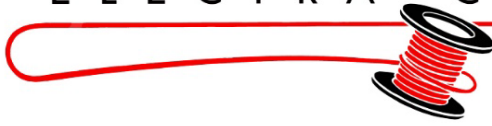
7.1 Electra Cables plans to undertake the following actions for reporting period 2022:

- Further formalise high-level risk assessment and reporting process.
- Undertake additional awareness raising with key personnel.
- Enhance governance and MSS reporting during reporting period 2022.

7.2 Electra Cables commits to reviewing and improving our management of modern slavery risks through continually applying a continuous improvement approach based on feedback, efficacy, or measured effectiveness, and maturing our approach in assessing and addressing or managing risks.

7.3 We will continue to engage with key business partners to both support their approach to modern slavery risks and to strengthen our own approach.



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MODERN SLAVERY ACT 2018 (CTH)**STATEMENT ANNEXURE****Principal Governing Body Approval**

This statement was approved by the *principal governing body* of Electra Cables (Aust.) Pty Ltd as defined by the *Modern Slavery Act 2018 (Cth)*⁶ ("the Act") on 7 February 2024.

Signature of Responsible Board Member

This Modern Slavery Statement is signed by a *responsible member* of Electra Cables (Aust.) Pty Ltd as defined by the Act⁷:

Luke Zhou

Deputy Managing Director

15 February 2024

⁶ Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

⁷ Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

Mandatory Criteria

Please indicate the page number/s of your statement that address each of the mandatory criteria in section 16 of the Act are as follows:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	4
b) Describe the reporting entity's structure, operations and supply chains.	4–6
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	6–9
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	8
e) Describe how the reporting entity assesses the effectiveness of these actions.	Do not own or control any other entities
f) Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).*	10
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	10

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

