



Access Hardware Modern Slavery and Human Trafficking Statement

March 2021

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Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out the Access Hardware Group's actions to understand potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1st July 2019 to 30th June 2020.

As part of the construction products and construction activity sector, we recognise that we have a responsibility to take a robust approach to managing the risk of slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of the Access Hardware Group of companies.

- The Access Hardware Group of companies consists of wholesaling, distribution, direct product sourcing, locksmithing, manufacturing and the installation of security products.

We currently primarily trade in the Australian market although product is sourced from various local suppliers as well as countries outside of Australia including but not limited to China, USA, UK and NZ.

Responsibility for our anti-slavery initiatives is as follows:

Policies: Responsibility for putting in place and reviewing policies and the process by which they were developed is shared between the Group Operations Manager and the Chief Operating Officer.

- **Risk assessments:** Responsibility for putting in place the process and broad organisational responsibility for human rights and modern slavery risk analysis is shared between the Group Operations Manager and the Chief Operating Officer.
- **Investigations / due diligence:** Responsibility for ongoing investigations / due diligence falls under Supply & Logistics Department headed by the Group Operations Manager.
- **Training:** Training has been provided for key staff where in their roles, exposure to human rights and modern slavery practices is possible. This training will be completed at a minimum of every two years.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Employee code of conduct Our code makes it clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing the supply chain.

- **Supplier/Procurement code of conduct** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat employees with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship. All suppliers that we classify as a mid to high risk or coming from a region that may be classified as a higher risk are required to complete documentation outlining that they abide by our modern slavery code of conduct.
- **Recruitment/Agency workers policy** We use only specified, reputable employment agencies in our internal human resource departments to source labour and verify the practices of any new agency that it is using before accepting workers from that agency.

- **Due diligence**

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified; and
- 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.

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- developing a system for supply chain verification, whereby we evaluate potential suppliers before they enter the supply chain; and
- reviewing our existing supply chains whereby we evaluate all existing suppliers.

Training

We require Supply Chain, HR, Sales, Marketing & Managers within our organisation to complete training on modern slavery.

Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Awareness-raising programme

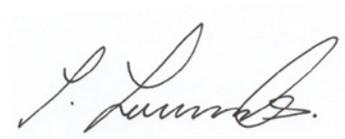
As well as training staff, we have raised awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- the basic principles of the Modern Slavery Act;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Approval

This statement was approved on March 15th, 2021 by our Group Managing Director who reviews and updates it annually.



Spencer Lowndes
Group Managing Director

Date: March 15th, 2021