

## Metlam Australia Introduction

We are a market leader in Toilet Partition Hardware and Commercial Washroom Product Supply. We operate, manufacture or source products from Australia, China, Taiwan, New Zealand, and Hong Kong and supply our products into markets such as Asia, Australia, New Zealand, Singapore, Europe and the USA.

## Relevant Policies

We adhere to 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 our operations:

- **Human Resources Policy** - We have zero tolerance of any threat of physical or sexual violence, harassment or intimidation against employees and their family, or close associates. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally and are paid the national award wage. Our employees won't be forced to work in excess of the number of hours permitted in law, and normal working hours won't exceed 44 hours per week.
- **Purchasing Policy** - Our organisation is committed to conducting purchasing activities in a fair, objective and transparent manner that satisfies the requirements of accountability and internal controls including but not limited to Metlam Australia's 'Quality Management', 'Environmental', 'Ethical Code of Practice', and 'Modern Slavery and Human Trafficking' policies, which fulfil legal and financial obligations and effectively manages commercial risk. Emphasis is placed on selecting suppliers and service providers that demonstrate a recognisable environmental and sustainable business model, along with Corporate Social Responsible (CSR) standards. This includes, but is not limited to, compliance with laws and regulations, respect for human rights, labour working conditions, equal opportunities, health and safety accreditation, maintenance and promotion of information security, fair trade and acceptable corporate ethics.
- **Recruitment Policy** - The organisation uses only specified, reputable employment sources to procure staff and workers.
- **Whistleblowing Policy** - We encourage all of our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of Metlam Australia. 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 employees to make disclosures, without fear of retaliation.
- **Our Values** – Metlam Australia's values of Knowledge, Integrity and Action makes clearly states to our employees, the actions and behaviour that is expected of them

while representing us. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

## Due Diligence

We undertake due diligence when considering taking on new suppliers and review our existing suppliers on a regular periodic basis. Our due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier
- 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.

## Awareness-Raising Programme

As well as training employees, Metlam Australia has raised awareness of modern slavery issues by circulating information to our employees.

The information explained to relevant employees:

- The basic principles of the Modern Slavery Act 2018;
- 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 the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.