



Modern Slavery Statement 30 June 2022

Introduction

GWA acts ethically and with integrity in all its business dealings and relationships including the implementation and enforcement of effective systems and controls to ensure modern slavery does not take place in its operations or supply chains. In accordance with its risk appetite, GWA has a zero-tolerance policy for modern slavery practices.

This statement is made under section 14 of the *Modern Slavery Act 2018* (Cth) for the financial year ended 30 June 2022. It includes detailed responses to each of the mandatory criteria set out in section 16 of the *Modern Slavery Act 2018* (Cth).

This statement:

- details the structure, operations and supply chains of GWA and its subsidiaries;
- outlines the potential risks of modern slavery that may exist within the operations and supply chains;
- sets out the measures GWA has implemented across its business to assess and address these risks;
- provides an update on how GWA is measuring the effectiveness of the actions taken to assess and address modern slavery risks; and
- concludes by providing an overview of key initiatives planned and in progress for FY23 as part of GWA's efforts to continually improve its response to the risks of modern slavery.

1. Identification of the Reporting Entity

This statement relates to GWA Group Limited (ABN 15 055 964 380) ("**GWA**") and each of its subsidiaries (together, the "**Group**"), as set out in Appendix 1.

GWA is a public company listed on the Australian Securities Exchange (ASX). Its registered office is located at Building 3B, 188 Holt Street, Pinkenba QLD 4008 AUSTRALIA; and its web address is <https://www.gwagroup.com.au/>.

2. GWA – Structure , Operations and Supply Chains

GWA is a leading innovator, designer and supplier of product solutions, services and intelligent technology focused on the delivery of sustainable water solutions for bathrooms, kitchens and laundries.

GWA owns and distributes market-leading brands and state of the art product solutions across sanitaryware, tapware, showers, basins, baths, kitchen sinks, laundry tubs, bathroom/kitchen accessories and valves. GWA has an intelligent bathroom system incorporating Internet of Things (IoT) smart water management solutions.

GWA operates and has sale and distribution facilities across its primary markets of Australia, New Zealand, the United Kingdom and Asia (noting that GWA ceased its China sales function as of 30 June 2022).

GWA is highly respected within the building industry for innovation, water efficiency and safety, product reliability and quality, technical expertise and superior service. GWA

maintains quality and cost efficient long-term supply agreements with selected, exclusive manufacturing partners across Asia and Europe. GWA has an experienced senior management team in design, research and development, brand building, customer engagement, supply and distribution.

GWA’s market leading brands are Caroma, Methven, Clark, Dorf, Deva, Flexispray and Nefa.

GWA had 549 employees as at 30 June 2022 broken down as follows:

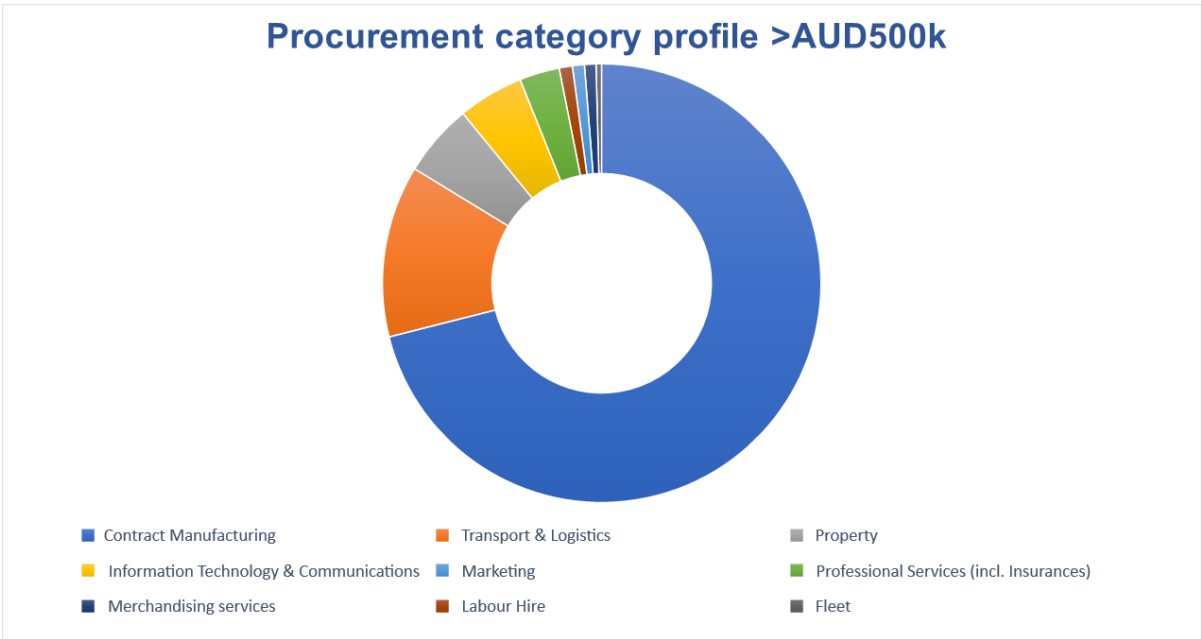
Market	Employee Count
Australia	371
New Zealand	105
United Kingdom	55
China	18 ¹
Total	549

The following table is a summary of GWA’s Australian workplace profile as at 30 June 2022:

Gender Diversity	% Female
Management	39%
Non-management	43%
Total	42%

GWA Supply Base

GWA has a diverse supply base predominantly made up of contract manufacturing which accounts for approximately 70% of its total addressable spend. While contract manufacturing is sourced offshore, the balance of GWA’s supply base is sourced locally in the respective home market and typically from established suppliers operating well-developed governance frameworks that are aligned to GWA’s commitment around human rights and who are themselves assessing and addressing modern slavery risks.



¹ In June 2022 GWA closed its China sales function, however GWA’s supply function remains in China.

Contract Manufacturing

GWA's largest procurement category is contract manufacturing which involves the manufacture of products across a portfolio of 33 key supply partners located in China, Malaysia, Vietnam, Thailand, Italy, Sweden and Germany. These partnerships have been established under long-term exclusive contracts and agreements, which are controlled and managed by a centralised GWA team.

Transport, Logistics and Warehousing

GWA's second largest procurement category involves transport, logistics and warehousing which fulfils the movement of GWA's products to and from its operational sites and customers. This category is outsourced to a small pool of locally based service providers.

GWA's controlled warehouse footprint covers approximately 60,000 sqm in the following markets:

Market	Warehouses
Australia	4
New Zealand	1
United Kingdom	1

The labour mix in GWA's warehouse operations include Enterprise Bargaining Agreement employees, unionised employees, and third party labour hire staff.

3. Risks to modern slavery practices in operations and supply chains

GWA has undertaken an analysis of its operations and supply chains to identify potential risks of modern slavery and believes the overall risk level to be low given the scope and location of the Group's operations, the maturity of its supply partner relationships and the diligence applied by GWA to identify and manage risks in the business.

To identify and assess potential modern slavery risks within its operations and supply chains, GWA references Principle 17 of the UN Guiding Principles on Business and Human Rights, which recommends focusing on assessing general areas of operations and supply chains where modern slavery risks are likely to be most significant. Accordingly, in identifying modern slavery risks, GWA has particular regard to geographical location, high-risk products or industries and high-risk work practices.

An area within GWA's operations and supply chains that may give rise to potential risks of modern slavery practices is the use of contract manufacturing plants which manufacture products for GWA in a number of Asian countries. The potential risks in these locations include trafficking, servitude, debt bondage, forced labour and child labour.

As COVID-19 related travel restrictions eased in FY22, GWA resumed its ethical sourcing auditing activities of Asian manufacturing partners through site visits and reviews.

GWA continually seeks to identify key areas of risk and to develop programs to resolve or mitigate such risks to the best of its ability.

4. Risk mitigation actions taken to assess and address these risks, including due diligence and remediation processes

In developing its risk mitigation plans, GWA references the UN Guiding Principles on Business and Human Rights. GWA has implemented the following Group-wide risk mitigation measures:

Governance Framework

GWA maintains a comprehensive range of Group-wide programs, policies and procedures that set out GWA's expectations for its employees and that underpin GWA's commitment to high standards of conduct and behaviour. GWA employees are continuously trained in the policies and procedures, including those related to human rights and GWA's company values.

With respect to modern slavery risks, key policies include:

Policy against Slavery and Trafficking in Persons (ref GWA094)	This policy details GWA's zero tolerance approach to Modern Slavery. Applies to all directors, officers and employees of GWA. The policy has been communicated to staff and key suppliers and is available at www.gwagroup.com.au .
Whistleblowing policy (ref GWA1012)	Provides the avenue for raising concerns of malpractice believed to be occurring. Concerns include (but not limited to), unlawful or unethical conduct, fraud or corruption, non-compliance with GWA's Code of Conduct and other relevant policies. A copy is available at www.gwagroup.com.au .
Risk Appetite Statement	This statement outlines GWA's low risk appetite for exposure to risks relating to its compliance responsibilities, the environment, safety, people, cultural pillars, ethics, reputation, critical system availability, cyber-attacks, and data privacy.
GWA Code of Conduct	GWA's Code of Conduct guides the behaviour of its people and demonstrates the commitment of the Group to ethical practices. Consistent with the Code of Conduct, GWA is committed to complying with all laws and regulations of the countries where GWA operates including prohibiting forced, trafficked and child labour. A copy of the code is available at www.gwagroup.com.au .
GWA Cultural Pillars	GWA's Cultural Pillars outline the company values and how these are applied to its business activities and the high standards of behaviour expected in the business to achieve the Group's objectives.
Work, Health & Safety policy	Details GWA's commitment to providing fair and safe working conditions for all its staff, casuals, contractors, and visitors.
Diversity and Inclusion policy (ref GWA1009)	Sets out the principles and practises that underpin GWA's approach to developing and maintaining a diverse workplace. A copy is available at www.gwagroup.com.au .
Equal Employment Opportunity, Discrimination, Harassment & Bullying policy	Seeks to treat all workers in a fair and consistent manner, regardless of race, religion, colour, sex or other protected personal characteristics. It also aims to provide all workers with a workplace free from bullying and supports the principles of equal opportunity by applying its employment policies in a non-discriminatory manner.

Policy Against Slavery and Trafficking in Persons

GWA has appointed its Company Secretary as the Ethical Standards Officer. The Company Secretary has primary day-to-day responsibility for implementing the policy, monitoring its use and effectiveness, dealing with any questions that arise, and ensuring audits and internal control systems and procedures are effective in countering modern slavery.

Under the policy GWA staff are required to be proactive and promptly report any suspected violations of the policy or any illegal or unethical behaviour of which they may become aware. Any complaints are treated in the strictest confidence and are dealt with appropriately. No staff member will experience retribution or retaliation for a complaint made in good faith. No violations were reported during FY22.

Implementation of modern slavery training module

GWA has an online training module on Modern Slavery which has been rolled out for all relevant GWA employees. The training communicates that compliance with the GWA's Policy Against Slavery and Trafficking in Persons is the duty of all employees and equips individuals with the tools and procedures for identifying, preventing, and reporting modern slavery activity or risks. All new starters are required to complete the course within 1 month of commencement as part of the On-Boarding program learning curriculum.

GWA recognises that maintaining a zero-tolerance policy for modern slavery requires ongoing awareness and education. Accordingly, GWA is rolling out a refresher program from FY23 that requires those in key roles of identifying modern slavery risks, such as Sourcing and Procurement personnel, to undertake annual completion of GWA's Modern Slavery training module, and employees in non-key roles will undergo refresher training every two years.

Requirements of supply chain partners to address potential risks of modern slavery in their operations

GWA has several long-standing key contract manufacturing partners and logistics partners. These relationships have been maintained through ensuring a satisfactory level of transparency and trust in the partners' business operations.

With respect to its contract manufacturing partners, GWA maintains a dedicated International Sourcing team, internal and third-party auditors, various policies and procedures to mitigate the risks of modern slavery including:

- GWA expects all manufacturing partners to be in strict compliance with the United Nations Ethical Trading Initiatives (ETI) and International Labour Organisation Conventions (ILO).
- GWA expects all manufacturing partners to comply with all applicable laws and regulatory requirements regarding health, safety and welfare at each facility to ensure the health, safety and welfare of all workers, customers and any visitors to the facility.
- Manufacturing partners must comply with all applicable laws, rules, regulations, standards and codes which relate to the manufacture, packaging, facilities, storage and delivery of products and the operation of the facility.
- GWA maintains a Supplier Due Diligence Policy which details the expectations which all manufacturing partners (including sub-contractors engaged by manufacturing partners), must adhere. GWA conducts thorough due diligence in line with the policy before engaging manufacturing partners.
- GWA conducts factory visits to manufacturing partners by local and senior

management on a regular basis to verify compliance with local laws and safety conditions as well as GWA's Supplier Due Diligence Policy. While COVID-19 related travel restrictions reduced the manufacturing partner factory visits GWA has maintained regular engagement and oversight through this period to ensure no issues arise. This has been primarily achieved through GWA staff who are located at various manufacturing partners in China, regular communications and GWA's modern slavery and ethical sourcing audit programs.

- GWA works constructively with its overseas manufacturing partners to assist them in adopting workplace safety standards similar to those applied in Australia.
- Manufacturing partners must undergo a Supplier Site Visit Assessment ("**SSV**") prior to entering into purchasing arrangements with GWA. The SSV is a detailed assessment of the supplier's facilities and the manner in which they are operated, including safety, environmental and human resource related factors. COVID-19 related travel restrictions delayed the onboarding of new manufacturing partners in FY22.
- GWA maintains a Supplier Corporate Social Responsibility Checklist to which supply partners are held accountable for compliance. This checklist incorporates key areas including labour rights, working conditions, living wages and discrimination.
- GWA continues to advocate for ethical sourcing and therefore progressively renews its Manufacturing and Supply Agreements with key manufacturing partners to incorporate the following:
 - compliance with Australian and international modern slavery laws relevant to the supplier;
 - entitlement for GWA to investigate and verify compliance with Australian and international modern slavery laws;
 - provision of information regarding itself and each of its suppliers involved in producing GWA products to confirm that neither the supplier nor any of its officers, agents or employees has been convicted or investigated for any offence in connection with any Australian or international modern slavery laws; and
 - implementation of anti-modern slavery policies and due diligence procedures.
- GWA retains the ability to terminate its Manufacturing Supply Agreements should any instances of modern slavery come to light irrespective of whether the specific modern slavery clauses are included.
- In FY22 GWA took steps to become a member of Supplier Ethical Data Exchange (Sedex) to enhance GWA's stewardship with ethical trade and further ensure transparent, ethical, and responsible sourcing standards. Sedex is one of the world's leading ethical trade service providers working to improve the working conditions in global supply chains. It is a member-based organisation and provides an online platform to manage supply chain information.

5. Assessing the effectiveness of the actions GWA is taking to assess and address the risks of modern slavery practices

GWA recognises the importance of continuous improvement in all its business operations, including the identification and mitigation of modern slavery risks. GWA's measures of effectiveness of the actions undertaken above include:

Monitoring and Reporting

GWA's Whistleblowing Policy provides an avenue for employees to raise concerns of unethical conduct including human rights issues. There were no reported modern slavery risks or human rights breaches through GWA's Whistleblowing Policy during FY22.

Supplier Audits

With a primary focus on contract manufacturing, to mitigate the risk of slavery and trafficking occurring throughout its supply chains, GWA has instituted modern slavery and ethical sourcing audit programs.

Audits are conducted through site visits, document review and interviews with representatives from the supplier. Suppliers are required to remediate any issues identified within an appropriate period, depending on the nature and severity of the non-compliance.

This program was until FY20 performed by GWA personnel. However the work of GWA's employees has since FY20 been supplemented by the engagement of a specialist independent auditor, PWC, as part of GWA's internal audit program. During FY22, GWA conducted independent audits on two of its contract manufacturing suppliers. Together with the four supplier audits in FY20 and FY21 GWA has audited approximately 48% of its global contract manufacturing spend.

A labour right discrepancy and some health and safety matters were identified during the FY22 audits, all of which have been satisfactorily rectified. No other issues were identified as a result of the audits.

6. Description of the consultation process with GWA's subsidiaries

GWA sets policies and makes decisions for the Group including all subsidiaries which ensures a consistent approach to addressing modern slavery risks. GWA ensures that all relevant areas of the company and its subsidiaries are aware of what actions they need to take and that modern slavery risks relating to these areas and subsidiaries have been identified, assessed and addressed.

As part of the consultation process with its subsidiaries, GWA has taken the following actions:

- the adoption and implementation of a policy against slavery and trafficking in persons throughout the corporate group;
- the same modern slavery training and capacity building has been made available throughout the Group;
- the reporting of information and analysis about modern slavery risks in the operations and supply chains of subsidiaries; and
- the adoption and implementation of the same risk mitigation actions, due diligence, and remediation processes throughout the corporate group.

7. COVID-19 response

As a result of the COVID-19 pandemic, GWA prioritised the health, safety and wellbeing for all of its staff and visitors to its sites. GWA's warehouse staff in Australia were considered essential workers and continued to work during lockdowns with the reassurance of GWA's adherence to COVID-19 safe practices and protocols. GWA's focus during the pandemic remains on saving lives and livelihoods. This extended to GWA's key supply partners to understand and support their response efforts to the pandemic to ensure no increased risk of modern slavery practices within their operations.

Many of GWA's supply partners responded with information on the steps they took to protect their workers such as:

- the provision of masks and personal protective equipment;
- social distancing guidelines;
- increased cleaning and disinfecting of workplace areas;
- alternate working shifts;
- contactless deliveries;
- health and education programs;

- temperature and COVID-19 testing; and
- provision of hired accommodation and chartered transport to access the workplace safely and to protect livelihoods.

GWA is proud of the fact that it has been able to maintain all existing product suppliers and continue to place orders in line with business forecasts. GWA pays in full for finished product from all suppliers globally and continue to honour agreed payment terms.

GWA is committed to working together with its supply partners on an open and transparent basis, to mitigate the longer-term impacts of the pandemic.

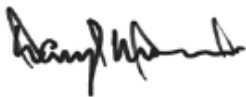
8. Looking ahead

GWA recognises that preventing modern slavery requires a continuing year-on-year commitment. GWA is committed to continuously improving its modern slavery risk identification and mitigations. GWA will continue to track and publicly report on progress through publishing its annual modern slavery statement.

Key initiatives planned and in progress for FY23 include the following:

- implement a refresher program that requires personnel in key roles of identifying modern slavery risks, such as Sourcing and Procurement personnel, to undertake annual completion of GWA's Modern Slavery training module, and employees in non-key roles, to undergo refresher training every two years;
- continuing to build long-term relationships with key supply partners to enhance transparency and trust in their business operations;
- implementation of a GWA Supplier Code of Conduct which will outline key attributes expected of all supply partners in dealing with GWA and complement GWA's existing policies and procedures in this important area;
- continuing to update key supplier agreements to prohibit modern slavery as these present for renewal;
- ongoing auditing of key supply partners as part of the modern slavery and ethical sourcing rolling internal audit program;
- work with GWA's contract manufacturing partners to become members of Sedex to improve GWA's understanding of potential modern slavery risks;
- review and report on results of Modern Slavery questionnaire for non-inventory suppliers that was issued in June 2022; and
- issue GWA's Modern Slavery questionnaire to merchandising partner(s).

This statement was approved by the GWA Board of Directors on 25 November 2022.



Darryl D McDonough
Chairman



Urs B Meyerhans
Managing Director

6 December 2022

Appendix 1

Parent entity	Country of incorporation
GWA Group Limited	Australia
Subsidiaries	
Caroma Holdings Limited	Australia
Caroma Industries Limited	Australia
GWA Group (NZ) Limited	New Zealand
Caroma International Pty Ltd	Australia
Caroma Singapore Pte Ltd	Singapore
Caroma Middle East FZCO	UAE
Deva Tap Company Ltd	United Kingdom
GWA Finance Pty Limited	Australia
GWA Group Holdings Limited	Australia
GWA Group Holdings (NZ) Ltd	New Zealand
GWA Trading (Shanghai) Co Ltd	China
Methven Australia Pty Limited	Australia
Methven UK Limited	United Kingdom
Sebel Furniture Holdings Pty Ltd	Australia
Methven ROI Limited	Republic of Ireland