



**WURTH AUSTRALIA
MODERN SLAVERY
STATEMENT 2024**

**READY
FOR WORK**



An Important Message From the Chief Executive Officer of Würth Australia and Senior Vice President of the Würth Group

We are committed to conducting our business with integrity, transparency, and respect for human rights. Modern Slavery, in all its forms is sadly a pervasive global issue. Würth Australia acknowledges its responsibility to uphold human rights and reaffirms its commitment to preventing Modern Slavery within its operations and supply chains.

This Modern Slavery Statement has been prepared by Würth Australia Pty Ltd (ABN 480 024 870 96) ("Würth Australia") in accordance with Section 13 of the Modern Slavery Act 2018 (the Act). It pertains to the financial year ending 31 December 2024 ("Reporting Period").

This statement outlines the steps we are taking to identify, prevent, and address Modern Slavery risks within our business and across our partnerships. I believe that businesses have a vital role in driving positive change, and we are committed to working alongside our stakeholders and governments to combat Modern Slavery. By holding ourselves to the highest standards, we maintain a zero-tolerance policy towards Modern Slavery in our operations and supply chains. We encourage vigilance in identifying and mitigating risks related to Modern Slavery within our business and broader supply chains.



Serge Oppedisano

WURTH AUSTRALIA'S STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

Würth Australia was established in Australia in 1982, and it is a wholly owned subsidiary of the German-based Würth Group. Operating within the Craft Line Business Unit, Würth Australia is part of a global organisation known for its expertise in fastening and assembly materials.

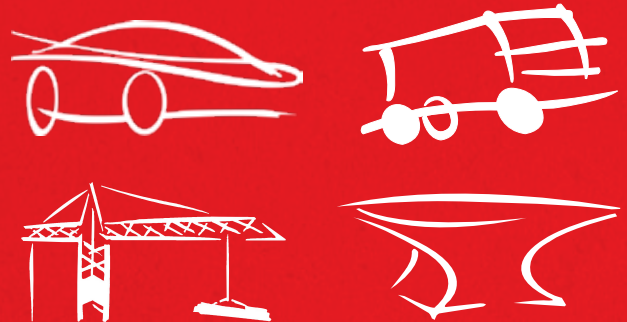
Our immediate parent company is Würth International AG, headquartered in Switzerland, while our ultimate parent entity, Adolf Würth GmbH & Co. KG, is based in Künzelsau, Germany. The Würth Group employs over 87,000 people globally across 400+ companies operating in over 80 countries.

Würth Australia specialises in importing and distributing over 20,000 products for industries including automotive, cargo, metal, construction, wood, and mining. This is achieved via a combination of direct sales and e-business solutions such as our eShop, app and e-procurement services. We believe that high standards in warehousing, logistics, and ethical business practices are integral to our success today and in the future.

In the Reporting Period we employed 670 people across Australia, with our main office being located in Dandenong, Victoria, and three distribution centres in Victoria, Queensland, and Western Australia. Approximately 451 sales executives service our customers, supported by 219 employees in our operations and corporate divisions. During the Reporting Period, our e-business sales increased by 43% and we had over 56,000 active customers.

Our key structures

- Sales and distribution - Automotive, Cargo, Mining, Metal, Construction, Construction Projects and Wood
- Finance
- Marketing
- Human Capital
- Recruitment and Learning and Development
- Product and Technical Support
- HSEQ
- Information Technology
- Customer Management, Key Accounts and Systems
- E-Business/Telesales
- Indirect Purchasing including Fleet and Travel



Our key supply chains

Product Sourcing

Würth Australia sources approximately 80-90% of its products from Würth Group manufacturers. The remaining 10-20% of products are sourced directly from third-party suppliers within Australia and internationally. All non-Würth Group suppliers are subject to compliance checks, including in relation to Modern Slavery.

Transport and Logistics Services

International freight services for importing products are managed by Würth Logistics Asia Pacific (WuLo), a Würth Group-owned entity operating under supply agreements. For domestic operations, Würth Australia engages local transport services to distribute products to customers across the country.

Warehouse operations and administrative services

Würth Australia operates three warehouses in Australia, employing both permanent and casual workers. Additional warehouse and administrative services are sourced from Würth Group entities or approved suppliers.

ASSESSING THE MODERN SLAVERY RISK IN OUR OPERATIONS AND SUPPLY CHAINS

Our commitment to eradicating Modern Slavery is paramount. We continue to assess whether our operations or supply chains may cause or be linked to Modern Slavery, as we recognise that the risk can fluctuate from time to time. Since we import and distribute various products, we accept that Würth Australia may be exposed to Modern Slavery directly or through our suppliers. Our high-level risk assessment which considers geography, sector and product/service type identifies the potential for Modern Slavery arising from:

Product supply chain

This supply chain has the highest risk of Modern Slavery, especially in countries vulnerable to such behaviour. As such, it remains a key focus for Würth Australia. About 80% of our products come from Würth Group manufacturers in Europe (Germany and Poland), and Asia (China and Singapore). These entities follow Würth Group policies, compliance, and governance frameworks, which helps to mitigate the risk. The remaining 20% of products are sourced directly from Australian and other third-party international suppliers (USA and Chile), who must go through Würth Group's approval process before becoming authorised suppliers.

Transport and logistics services

This supply chain has a moderate risk of Modern Slavery due the varying size and scale of transport operators and countries they operate in. The largest transport spend for Würth Australia is on importing product to Australia, which is facilitated by Würth Group using approved supplier agreements with global transport providers. Würth Australia utilises WuLo for foreign freight movements therefore we consider that this risk is somewhat mitigated. Domestic transport providers directly engaged by Würth Australia include large and medium sized suppliers, some of which have existing Modern Slavery compliance and reporting obligations.

Warehouse and administrative operations in Australia

We consider the risk of Modern Slavery in our warehouse operations and administration functions is low, as they are subject to Würth Australia policies, procedures and governance frameworks as well as the Australian regulatory environment. The Würth Australia Enterprise Agreement 2022 provides equitable employment conditions for our Dandenong warehouse employees, and Würth Australia ensures compliance with relevant and applicable awards and associated pay rates and conditions. Würth Australia also receives administrative and support services, such as I.T., from Würth Group owned entities based in Asia. These entities are subject to Würth Group policies, compliance and governance frameworks.



CONTROLS TO ADDRESS THE RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAINS

To minimise the risk of Modern Slavery in our supply chains, the Würth Group and Würth Australia have formal policies, procedures and governance structures to promote and enforce ethical and legally compliant business conduct and behaviour. They reflect Würth values, standards, expectations, and commitment to compliance by our own employees, suppliers and customers. The following Würth Group policies apply to and are enforced by Würth Australia:

Würth Group Code of Compliance applies to all employees globally and stipulates minimum standards in relation to conduct and behaviour and includes adherence to human rights obligations and the prohibition of any form of forced or child labour, intimidation, harassment or unsafe work conditions.

‘Speak Up’ Hotline and Compliance Reporting System is available to all Würth employees, suppliers and customers globally. Standard incident reporting, investigation and resolution protocols exist to ensure any breaches of the Würth Group Code of Compliance and laws, including Modern Slavery practices, are addressed and remediated. Reports can be made anonymously using the SpeakUp Hotline.

Würth Group Supplier Code of Conduct reflects the Würth Group’s commitment to eliminating all forms of Modern Slavery, and this is communicated to suppliers. During the Reporting Period, suppliers who visited our Australian sites, including those that entered into a Würth Australia Supplier Agreement were required to read and acknowledge our 2023 Modern Slavery Statement and agree to comply with the Würth Group Supplier Code of Conduct.

Würth Australia also has the following policies and procedures which further support our values, standards, expectations, and commitment to ethical compliance:

- Employee Code of Conduct
- Whistleblower Policy
- Gifts and Gratuities Policy
- Recruitment Policy
- IMS Policy (Health and Safety, Environment and Quality)
- Anti-Discrimination and Equal Opportunity Policy & Complaints Procedure
- Workplace Gender Equality Policy.





Supplier Approval and Assurance Program

The following initiatives support the requirements of the policies and aim to inform, guide, and support the workforce and suppliers in protecting human rights, workplace and other ethical standards.

Global Third-Party Suppliers

The Würth Group carefully selects suppliers, ensuring they meet quality, regulatory, and ethical standards. New suppliers must agree to adhere to the Würth Group Supplier Code of Conduct, which includes respecting human rights and prohibiting child and forced labour. Supplier agreements also require fair workplace conditions and wages. The Würth Group audits suppliers to check compliance with these standards, focusing on product quality, workplace safety, and human rights.

Domestic Third-Party Suppliers (product and non-trade, including transport services)

The Würth Australia Supplier Management Procedure oversees the sourcing, engagement, and performance monitoring of domestic suppliers, who must follow the Würth Group Supplier Code of Conduct. The Australian Procurement Team handles due diligence and approval of local trade suppliers, ensuring they meet terms, service levels, and compliance obligations, including Modern Slavery risk factors. Our recently established Indirect Purchasing Department similarly handles due diligence and approval of local non-trade suppliers. Products from third-party Australian suppliers must also be approved by the Würth Group for compliance. Annual reviews of supplier performance and ratings are conducted to assess compliance obligations.

Würth Group Owned Suppliers

The Würth Group is accountable for ensuring compliance across its companies in Europe, Asia, and the USA, some of which also supply products and services to Würth Australia.

Regular audits conducted by the Würth Group assess adherence to internal standards and legal obligations, including human rights. During the Reporting Period, no Modern Slavery incidents were identified in audits or reported via the SpeakUp hotline. Moving forward, Würth Australia will see even more emphasis on the prevention of Modern Slavery by the Würth Group as a result of legislative measures such as the German Supply Chain Act (LkSG) and the European Union's Corporate Sustainability Due Diligence Directive (CS3D).



Employee Assistance Program

Wurth Australia's Employee Assistance Program (EAP) provides free, confidential 24/7 support to employees and their eligible immediate family members. Services cover both personal and work-related issues, including performance concerns, grief, financial challenges, and stress management.

Quality Management System

Wurth Australia operates an ISO 9001 integrated quality management system, which is also ISO 45001 and ISO 14001 compliant. Our IMS Team conducts planned audits of our Australian operations. All audit reports are reviewed and corrective actions implemented with oversight by the Wurth Australia CEO and Executive Team. In the Reporting Period, Wurth Australia achieved its IMS recertification with zero non-conformities.

Human Resources Support

Wurth Australia's Human Capital (HC) Team, together with Learning and Development, oversee employee development, performance, wellbeing, and compliance with employment laws. We ensure fair pay, manage overtime, and support return-to-work cases. During the Reporting Period, HC/HSEQ ran the annual flu vaccination program, appointed and trained Mental Health First Aid Officers and ran a Men's Health Campaign. Staff enjoyed the new head office gym and participated in a self-defence workshop for October Safety Month. Wurth Australia employees were invited to participate in the People At Work Survey, in order to continue our work on eliminating or reducing psychosocial hazards in the workplace. All hiring was approved by HC and Executive Management, following procedures including reference checks, criminal history checks and working rights verification.



Modern Slavery Risk Management and Improvement Plan

During the Reporting Period, we:

- Assessed responses from the Modern Slavery Self-Assessment Questionnaire and completed internal supplier risk assessments
- Provided Modern Slavery training to non-Würth Group suppliers who had requested the training offered via our Anti-Modern Slavery Program
- Identified any suppliers requiring further contact (based on the responses received, no suppliers were required to be followed up during the Reporting Period)
- Completed face-to-face audits of local non-Würth Group fastener suppliers
- Undertook an internal audit on Modern Slavery (no non-conformances were identified during the audit)
- Ensured new staff were provided with Modern Slavery training (all new staff were trained during the Reporting Period)
- Engaged the Würth Group's Quality and Legal Departments to complete a Modern Slavery questionnaire (no Modern Slavery concerns were reported via the SpeakUp hotline or identified in supplier audits during the Reporting Period)
- Responded to several customer requests for information on our Modern Slavery practices and agreed to include related obligations in supply contracts
- Monitored worldwide news on reported instances of human rights
- Educated the Executive Team about Modern Slavery, including cases in Australia (for example, human trafficking cases), country specific studies (including slavery prevalence index ranking, common forms of Modern Slavery in the particular country and relevant local legislation that aims to prevent forms of Modern Slavery), and "at risk" products during Executive Team meetings
- Consulted with our Executive Team and HSEQ Committee (which comprises managers and employee representatives) in relation to review and approval of our Modern Slavery Risk Profile and Management Plan
- Educated the wider business about the steps Würth Australia has taken to prevent Modern Slavery in its operations and supply chains during the Relevant Period
- Published our fourth Modern Slavery Statement on our intranet and our website
- Monitored our whistleblowing channels for reports of Modern Slavery (no relevant reports were made during the Reporting Period)
- Reviewed key competitors' Modern Slavery Statements and reported back to the Executive Team.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS AND OUR 2025 PLAN

Würth Australia is committed to active management of our potential Modern Slavery risk and monitoring the effectiveness of our risk management and compliance process surrounding Modern Slavery risk.

To assess the effectiveness of the measures taken by Würth Australia, our Modern Slavery Risk Monitoring Program includes for each Modern Slavery risk and key control, a KPI control target and review frequency for reporting to the Würth Australia Executive Team.

The main control areas are:

- Continuous review and improvement of our Modern Slavery Risk Profile and Management Plan
- Supplier contracts and terms and conditions compliance
- Supplier risk assessment and monitoring
- Training
- Global incident monitoring
- Würth Australia audit and compliance program
- Completion of Würth Group questionnaire

During the course of the 2025 reporting period, we will:

- Adopt an online Modern Slavery Supply Chain Risk Assessment Program
- Identify any suppliers requiring further due diligence and develop remediation plans in conjunction with the supplier(s) as and when required
- Continue to require our non-Würth Group suppliers registered through the OnLocation portal to read and acknowledge our current Modern Slavery Statement
- Complete face-to-face audits of local non-Würth Group chemical suppliers
- Ensure ongoing training and awareness of our Modern Slavery statement amongst staff, including by publishing our fifth Modern Slavery Statement on our intranet and our website and allocating to staff in Litmos
- Include Modern Slavery obligations in our Würth Australia supplier agreements
- Undertake an annual internal audit on Modern Slavery, and identifying any opportunities for improvement
- Consult with our HSEQ Committee and Executive Team in relation to review and approval of our Modern Slavery Risk Profile and Management Plan
- Monitor the reporting channels for any reported instances of human rights impacts in our operations and supply chains
- Continue our awareness educational campaign for our Executive Team and the wider business about Modern Slavery.

This Statement was approved by the Board of Würth Australia Pty Ltd on 24 June 2025.





WURTH AUSTRALIA MODERN SLAVERY STATEMENT 2024

Würth Australia Pty. Ltd. Head Office

Building 5, 43 - 63 Princes Highway,
Dandenong South, VIC. 3175
T: 1300 65 77 65 (Local Call)
Info@wurth.com.au
www.wurth.com.au



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