



MODERN SLAVERY STATEMENT 2025 WURTH AUSTRALIA

**READY
FOR WORK**





A message from the CEO and the Senior Vice President of the Würth Group

At Würth Australia, we believe in doing business the right way. This means being honest, transparent, and treating people with respect—every day, in every part of our business.

Modern Slavery occurs when individuals are exploited and unable to leave their work due to coercion, deception, or abuse. It can take many forms, including forced labour, human and sex trafficking, debt bondage, deceptive recruitment practices, and the exploitation of vulnerable people.

It is a serious global issue, and we recognise the role we must play in addressing it. We are committed to ensuring that it has no place in our operations or supply chains.

Our commitment to doing business the right way continues to evolve. We focus on continuously improving our practices, strengthening collaboration across our business, and creating long-term value. This commitment is reinforced through the Würth Group Supplier Code of Conduct, which sets clear expectations for ethical behaviour, respect for human rights, and responsible business practices across our global supplier network.

The Würth Group Supplier Code of Conduct requires suppliers to:

- ✓ Respect human rights and treat workers fairly
- ✓ Prohibit forced labour, child labour, and exploitation
- ✓ Provide safe working conditions and fair wages
- ✓ Operate with integrity and transparency

By enforcing consistent standards across our supply chains, the Supplier Code of Conduct supports our zero-tolerance approach to Modern Slavery.

Through close collaboration with our employees, suppliers, and partners, we remain focused on identifying risks early and addressing them appropriately. By openly reporting on our actions, we aim to build trust with our customers, partners, and stakeholders, while contributing to the global fight against Modern Slavery.

Serge Oppedisano

WURTH AUSTRALIA'S STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

Wurth Australia was established in 1982 and operates as a wholly owned subsidiary of the Germany-based Wurth Group, a global leader in the manufacture and distribution of fasteners and assembly materials.

Its immediate parent company is Wurth International AG, headquartered in Switzerland, while its ultimate parent entity, Adolf Wurth GmbH & Co. KG, is based in Künzelsau, Germany. The Wurth Group employs more than 88,000 people across over 400 companies operating in more than 80 countries worldwide.

Wurth Australia imports and distributes a range of over 20,000 products across industries including automotive, cargo, metal, construction, wood, trade, and mining. Customers are serviced through a combination of direct sales and e-business solutions, including its eShop, mobile app, and e-procurement services. Wurth Australia maintains strong standards in warehousing, logistics, and ethical business practices to support consistent service delivery and long-term value.

This statement outlines how Wurth Australia Pty Ltd (ABN 48 002 487 096) monitored, identified, mitigated, and remediated the risk of Modern Slavery in its operations and supply chains in the year ending 31 December 2025 ("Reporting Period"). It has been prepared in accordance with the Modern Slavery Act 2018 (Cth), section 13. This is Wurth Australia's sixth Modern Slavery Statement.

During the Reporting Period, Wurth Australia employed 629 people nationwide across its sales, warehouse, and corporate functions. Its operations were supported by three distribution centres located in Victoria, Queensland, and Western Australia. A team of approximately 413 sales professionals supported

customers, alongside 77 warehouse employees and 139 corporate team members based at its head office in Dandenong South, Victoria.

Wurth Australia's Operations and Supply Chains

Product Sourcing

Wurth Australia sources most of its product range – approximately 80 to 90% – from Wurth Group-owned entities located in Germany, Australia, New Zealand, Brazil, Poland, China, and Singapore. This global sourcing network enables consistent quality and alignment with Wurth Group standards.

The remaining 10–20% of products are sourced from carefully selected third-party suppliers, both within Australia and internationally (the U.S.A., Panama and Malaysia). All third-party suppliers are subject to a formal approval process through the Wurth Group Procurement function, ensuring compliance with established quality, governance requirements and the Wurth Group Supplier Code of Conduct.

Transport and Logistics Services

International freight and importation activities are coordinated through Wurth Logistics Asia Pacific (WuLo), a Wurth Group-owned entity operating under established supply arrangements. Domestically, Wurth Australia partners with local transport providers to ensure efficient and reliable delivery of products to customers nationwide.

Warehouse Operations and Administrative Services

Wurth Australia operates three warehouse facilities across the country, supported by a workforce of permanent and casual employees. Recruitment is managed directly through the Wurth Australia Recruitment Department, without the use of labour hire agencies.

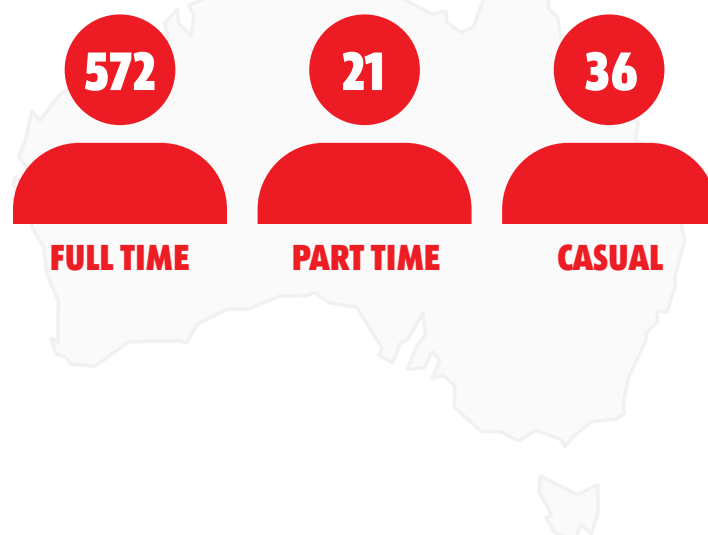
Additional warehouse and administrative services are sourced through Wurth Group entities and approved suppliers, supporting operational efficiency and consistent service delivery.

Wurth Australia's Structure

- Sales and Distribution – Automotive, Cargo, Mining, Metal, Construction, Trade, Construction Projects and Wood
- Customer Management, Key Accounts and Systems
- E-Business and Telesales
- Finance
- Health Safety Environment and Quality
- Human Capital
- Indirect Purchasing including Fleet and Travel
- Information Technology
- Marketing
- Product and Technical Support
- Recruitment and Learning and Development

During the Reporting Period, E-Business sales increased by 7.6% and Wurth Australia had over 55,000 active customers.

AUSTRALIAN EMPLOYEE STATUS



ASSESSING THE MODERN SLAVERY RISK IN WURTH AUSTRALIA'S OPERATIONS AND SUPPLY CHAINS

Wurth Australia adopts an ongoing risk-based approach to assessing potential exposure to Modern Slavery across its operations and supply chains. The business recognises that Modern Slavery risks can evolve over time and therefore undertakes periodic reviews to identify whether its activities may cause, contribute to, or be directly linked to such practices.

As an importer and distributor of a broad product range, Wurth Australia acknowledges that exposure to Modern Slavery risks may arise both directly within its operations and indirectly through its supply chains. A high-level risk assessment has been conducted, considering factors such as geography, sector, and product and service type. This assessment has identified key risk areas set out below.

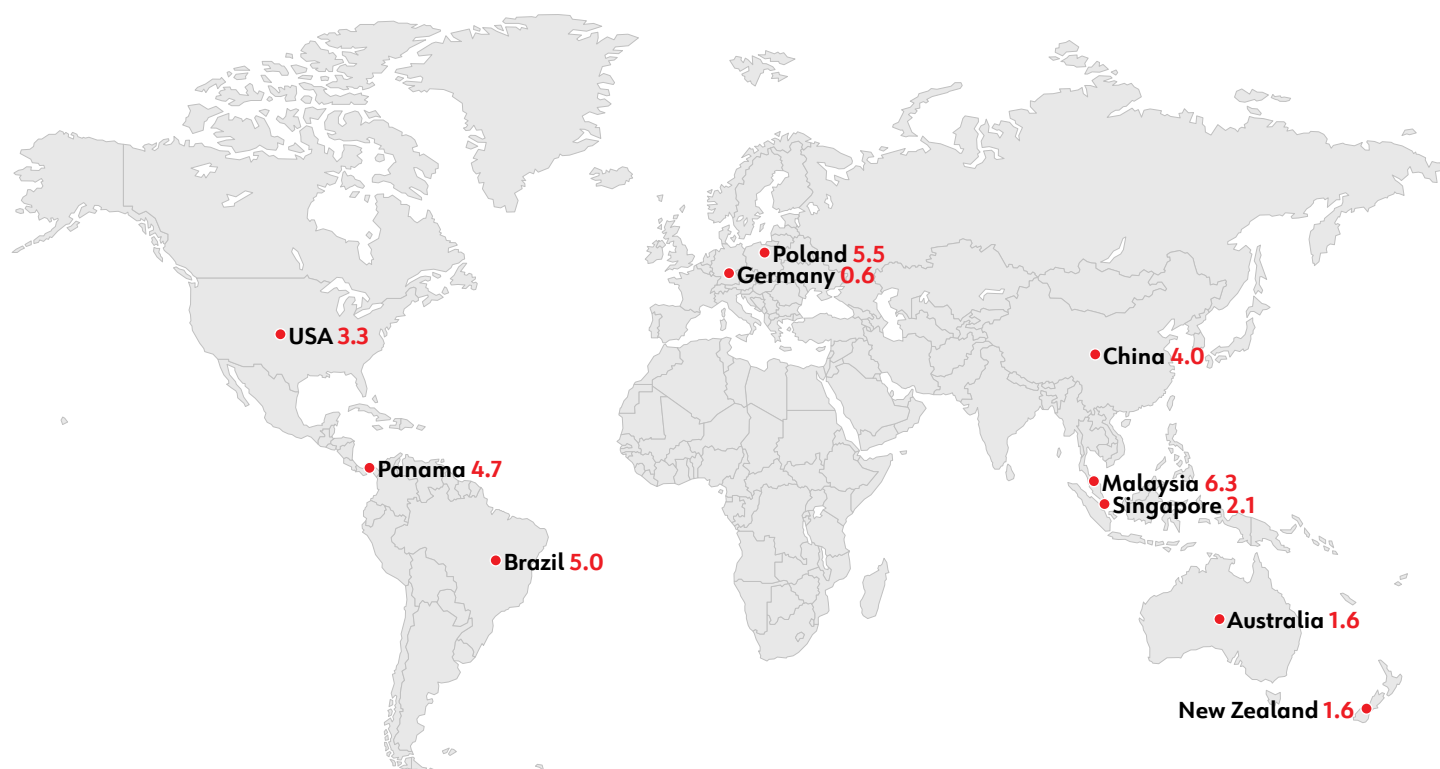
Product supply chain

The product supply chain represents the area of highest potential risk, particularly where sourcing occurs in jurisdictions with elevated vulnerability to Modern Slavery practices. As a result, this area remains a key focus for Wurth Australia's risk management approach.

Approximately 80% of products are sourced from Wurth Group-owned entities located in Europe (Germany and Poland), Australia, New Zealand, Brazil, and Asia (China and Singapore). These entities operate within established Wurth Group policies, compliance standards, and governance frameworks, which support a consistent approach to risk identification and mitigation.

The remaining 20% of products are sourced from Australian and international third-party suppliers. These suppliers are required to undergo a formal approval process through the Wurth Group Procurement function before being authorised, providing an additional layer of oversight.

Wurth Australia assesses geographic risk using internationally recognised data sources, including the Global Slavery Index (2023). Based on estimated prevalence rates, countries relevant to its supply chain have been categorised into indicative risk levels:



Risk Level	Countries	Description
Low risk	Germany, Australia, New Zealand, Poland	Countries with relatively low estimated prevalence of Modern Slavery and generally strong regulatory and governance frameworks.
Medium risk	Singapore, United States, China, Panama	Countries with moderate prevalence and/or identified sector-specific or migrant labour risks.
Higher risk	Brazil, Malaysia	Countries with higher estimated prevalence of Modern Slavery and increased structural or sector-based risk factors.

This categorisation is used as a general indicator only and does not, of itself, determine the presence of Modern Slavery. Wurth Australia recognises that Modern Slavery risks may exist in all countries and sectors.

ASSESSING THE MODERN SLAVERY RISK IN WURTH AUSTRALIA'S OPERATIONS AND SUPPLY CHAINS

Transport and Logistics Services

Transport and logistics services are assessed as presenting a moderate level of risk, reflecting the diversity of operators, jurisdictions, and labour conditions within this sector.

A significant proportion of transport-related activity relates to international freight for imported products. These services are coordinated through WuLo, a Wurth Group-owned entity that engages global transport providers under established supply agreements. This structure supports consistency, visibility, and oversight within international logistics operations.

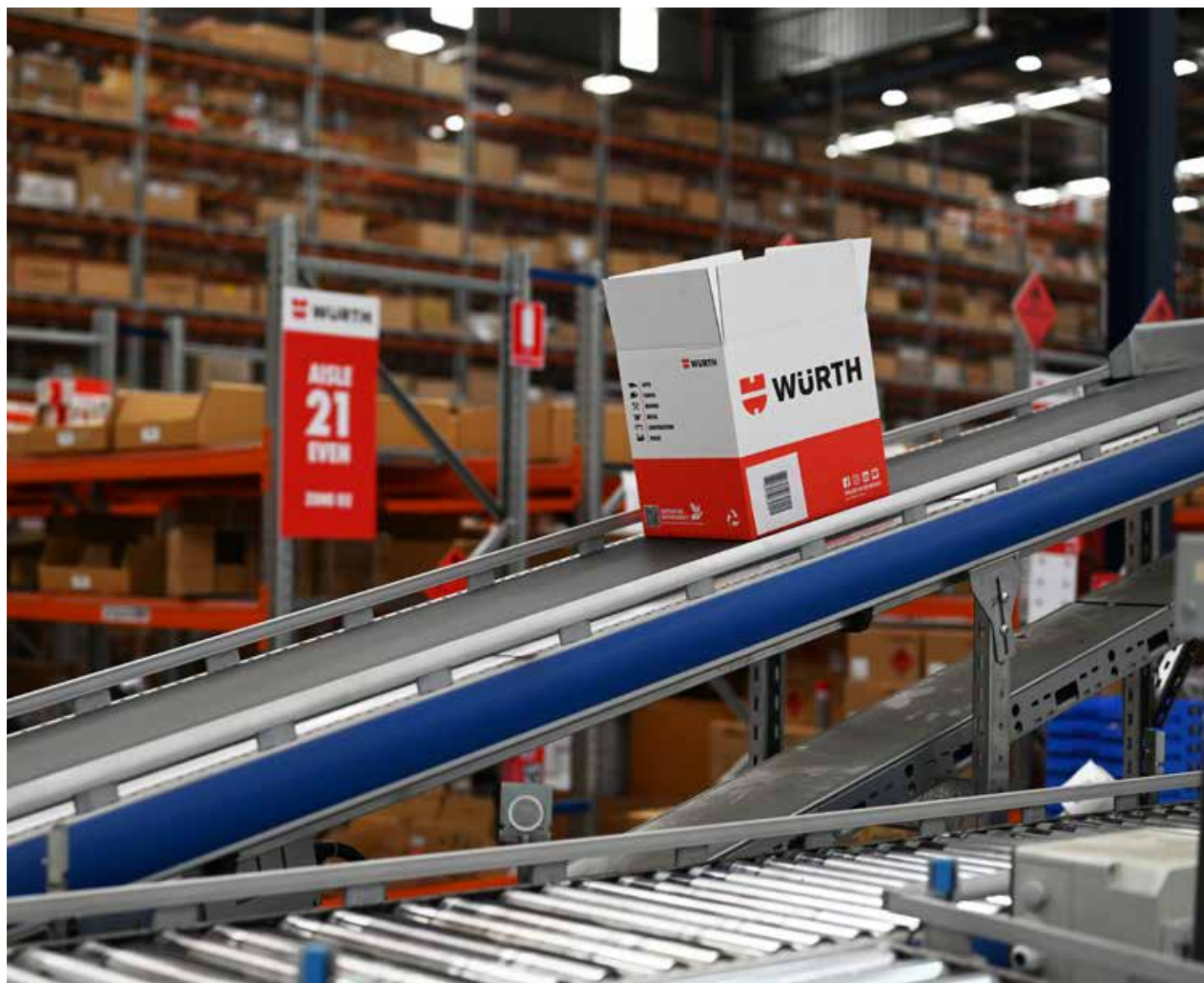
For domestic distribution, Wurth Australia engages a range of large and medium-sized transport providers. Many of these providers are subject to Modern Slavery reporting obligations or maintain their own compliance frameworks, which contributes to mitigating risk in this segment.

Warehouse and Administrative Operations in Australia

The risk of Modern Slavery within Wurth Australia's warehouse and corporate operations in Australia is assessed as low. These activities are conducted within a regulated environment and are governed by internal policies, procedures, and established employment frameworks.

Warehouse employees at the Dandenong South facility are covered by the Wurth Australia Enterprise Agreement 2022. Wurth Australia ensures compliance with applicable industrial instruments, including relevant modern awards, pay rates, and conditions.

In addition, Wurth Australia receives certain administrative and support services, including IT services, from Wurth Group entities based in Asia. These entities operate under Wurth Group policies and governance frameworks, supporting a consistent approach to compliance and risk management.



CONTROLS TO ADDRESS THE RISKS OF MODERN SLAVERY IN WURTH AUSTRALIA'S SUPPLY CHAIN



Wurth Australia, supported by the Wurth Group, maintains a structured and proactive approach to mitigating Modern Slavery risks across its operations and supply chains. This approach is underpinned by established policies, procedures, and governance frameworks designed to promote ethical, transparent, and legally compliant business practices. These frameworks reflect the Wurth Group's values, standards, and expectations, and apply to employees, suppliers, and business partners globally.

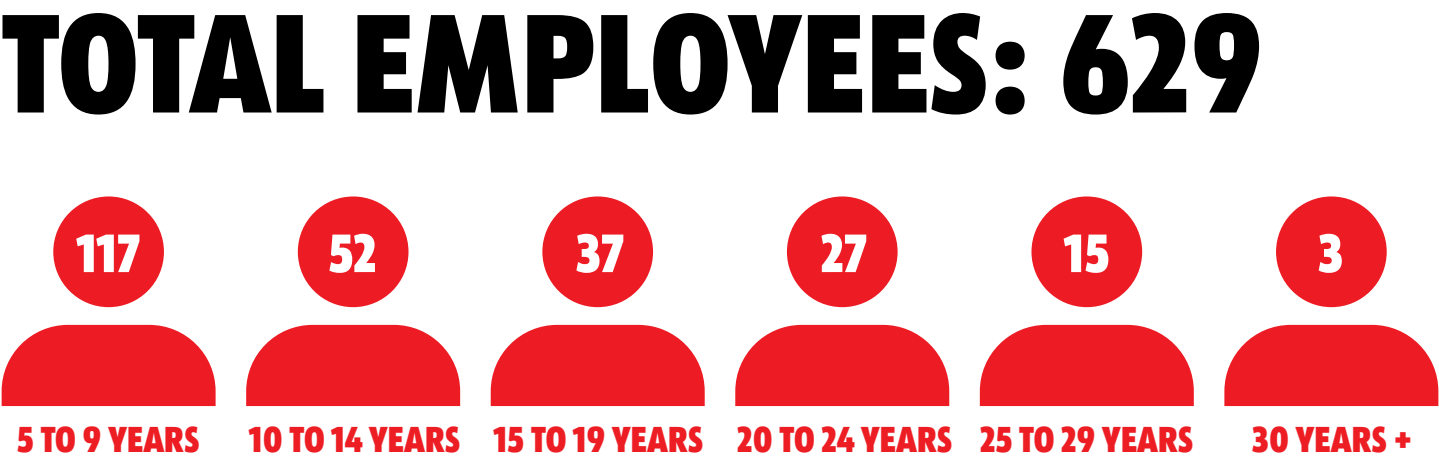
- Group Code of Compliance**
Applies to all employees globally and establishes minimum standards of conduct. It includes explicit commitments to human rights and prohibits forced labour, child labour, discrimination, harassment, and unsafe working conditions.
- “Speak Up” Hotline and Compliance Reporting System**
Accessible to employees, suppliers, and customers worldwide, this system enables confidential and anonymous reporting of concerns. Established protocols ensure that reported matters are investigated and addressed appropriately, including potential Modern Slavery risks.
- Group Supplier Code of Conduct**
Reinforces Wurth Australia's zero-tolerance approach to Modern Slavery. Suppliers are required to comply with standards relating to human rights, labour conditions, and ethical conduct. During the Reporting Period, relevant suppliers were required to acknowledge the 2024 Modern Slavery Statement and adhere to these requirements as part of supplier engagement processes.

At a local level, Wurth Australia's workforce operates within a comprehensive governance framework supported by policies that include:

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

These policies collectively support a culture of accountability, fairness, and compliance with Australian employment and regulatory requirements. Wurth Australia maintains a stable and experienced workforce, with approximately 40% of employees having more than five years' tenure and over 20% with more than ten years' service. This depth of experience reflects strong employee retention and consistent, compliant employment practices.

Workforce tenure distribution as at 31 December 2025



CONTROLS TO ADDRESS THE RISKS OF MODERN SLAVERY IN WURTH AUSTRALIA'S SUPPLY CHAIN

Supplier Approval and Assurance

Global Third-Party Suppliers

The Wurth Group applies a structured supplier selection framework to ensure that third-party suppliers meet defined quality, regulatory, and ethical standards. All new suppliers are required to comply with the Wurth Group Supplier Code of Conduct, including provisions relating to human rights and the prohibition of forced and child labour.

Supplier agreements incorporate expectations regarding fair working conditions and appropriate remuneration. Supplier audits are conducted to assess compliance with these standards, including in areas such as workplace safety, product quality, and human rights.

Domestic Third-Party Suppliers

Within Australia, supplier engagement is governed by the Wurth Australia Supplier Management Procedure. This framework oversees sourcing, onboarding, and ongoing performance monitoring.

The Australian Procurement Team is responsible for due diligence and approval of domestic trade suppliers, including assessment of Modern Slavery risk factors through an online supply chain risk assessment tool. The Indirect Purchasing function performs similar oversight for non-trade suppliers, including service providers such as transport operators.

All third-party suppliers are required to comply with the Wurth Group Supplier Code of Conduct, and supplier performance is reviewed periodically to ensure continued alignment with compliance obligations.

Wurth Group-Owned Suppliers

Wurth Australia benefits from sourcing through Wurth Group-owned entities, which are subject to Group-wide governance, compliance, and audit processes. The Wurth Group maintains oversight of these entities across Europe, Asia, and the United States, including regular audits to assess compliance with legal requirements and internal standards.

During the Reporting Period, no Modern Slavery incidents were identified through audit activities or reported via the Speak Up system. An increased focus on Modern Slavery prevention has been driven by evolving regulatory frameworks, including Germany's Supply Chain Due Diligence Act (LkSG) and the European Union's Corporate Sustainability Due Diligence Directive (CS3D).

Workforce and Employment Practices

Wurth Australia's Human Capital function oversees workforce management, supporting employee development, wellbeing, and compliance with employment legislation. Recruitment and onboarding processes include reference checks, criminal history screening, and verification of work rights to ensure compliance and transparency.

Employment conditions are structured to provide fair and lawful remuneration and working arrangements, including oversight of working hours and return-to-work programs.

Employee wellbeing initiatives implemented during the Reporting Period included health and inclusion programs, free hearing tests, workplace engagement activities, and access to on-site and wellbeing resources, reinforcing a positive and supportive workplace environment.

Employee Assistance Program (EAP)

A confidential, 24/7 EAP service is available to employees and eligible family members, providing support across personal and work-related matters, including financial stress, mental health, and wellbeing.

Quality and Compliance Systems

Wurth Australia operates an integrated management system aligned with ISO 9001 (Quality), ISO 45001 (Health and Safety), and ISO 14001 (Environment) standards. Internal audits are conducted on a planned basis to assess compliance with operational, quality, and ethical standards.

Audit outcomes are reviewed by senior leadership, with corrective actions implemented where required. During the Reporting Period, Wurth Australia successfully achieved recertification of its Integrated Management System, reinforcing its commitment to continuous improvement and operational excellence.

Modern Slavery Risk Management and Improvement Plan

During the Reporting Period, Würth Australia:

- Replaced its Anti-Modern Slavery Program with an online Modern Slavery Supply Chain Risk Assessment Program;
- 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 visits to local non-Würth Group chemical 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 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 multiple 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, and presented an overview of non-Würth Group supplier risk assessments obtained via our online Modern Slavery Supply Chain risk assessment tool during Executive Team meetings;
- Consulted with its Executive Team and HSEQ Committee (which comprises managers and employee representatives) in relation to review and approval of its Modern Slavery Risk Profile and Management Plan;
- Educated the business about the steps Würth Australia took to identify and prevent Modern Slavery in its operations and supply chains during the Relevant Period;
- Published its fifth Modern Slavery Statement on the intranet and website;
- Created a landing page on the Würth Australia website so that customers and suppliers can easily access all five Modern Slavery Statements in one dedicated location;
- Monitored its whistleblowing channels for reports of Modern Slavery (no relevant reports were made during the Reporting Period).



ASSESSING THE EFFECTIVENESS OF WURTH AUSTRALIA'S ACTIONS AND ITS 2026 PLAN

Wurth Australia is committed to active management of its potential Modern Slavery risk and monitoring the effectiveness of its risk management and compliance process surrounding Modern Slavery risks.

To assess the effectiveness of the measures taken by Wurth Australia, its 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 Wurth Australia Executive Team.

The main control areas are:

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

Based on the above measures, Wurth Australia considers its approach to managing Modern Slavery risk to be effective, with no incidents identified during the Reporting Period.

In the forthcoming 2026 reporting period, Wurth Australia will:

- Ensure new suppliers complete the online Modern Slavery risk assessment prior to engagement and complete an annual checking on existing non-Wurth Group suppliers;
- Identify any suppliers requiring further due diligence and develop remediation plans in conjunction with the supplier(s) as and when required;
- Complete face-to-face visits to local non-Wurth Group fastener suppliers;
- Engage the Group's Quality and Legal Departments to complete a Modern Slavery questionnaire;
- Respond to customer requests for information on our Modern Slavery practices;
- Ensure ongoing training and awareness of the most recent Modern Slavery statement amongst staff, including by publishing it on the Wurth Australia intranet and website and allocating to staff in the Litmos training portal;
- Include Modern Slavery obligations in Wurth Australia generated supplier agreements;
- Undertake an annual internal audit on Modern Slavery, and identify any opportunities for improvement;
- Consult with its HSEQ Committee and Executive Team in relation to review and approval of the Modern Slavery Risk Profile and Management Plan;
- Monitor the reporting channels for any reported instances of human rights that may impact in its operations and supply chains; and
- Continue an internal awareness and educational campaign.

This Statement was approved by the board of Wurth Australia Pty Ltd on 24th June 2026.



PRODUCT



MODERN SLAVERY STATEMENT 2025 WÜRTH AUSTRALIA

**READY
FOR WORK**

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