

HunterDouglas

HUNTER DOUGLAS HOLDINGS LIMITED ABN 47 000 238 451
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Modern Slavery Statement FY 2021

1. Introduction

Hunter Douglas Holdings Limited, and its subsidiary companies, (“Hunter Douglas”) is opposed to slavery in all its forms, including: slavery; servitude; forced labour; human trafficking; deceptive recruiting for labour or services; debt bondage; forced marriage; and the worst forms of child labour. This statement describes the steps taken by Hunter Douglas during the financial year ending 31 December 2021 to assess and address the risk of modern slavery occurring in our operations and supply chains.

This statement meets the reporting requirements of Australia’s Modern Slavery Act 2018 (Cth) and associated guidelines.

2. Our Structure, Operations and Supply Chains

The Hunter Douglas Group was established in 1919 by Henry Sonnenberg in Germany and is a world market leader in Window Coverings and a major manufacturer of Architectural Products. Since that time, the business has been owned by the Sonnenberg family, with the second and third generations managing the business.

The Hunter Douglas Group is comprised of 134 companies with 47 manufacturing and 87 assembly operations and marketing organisations in more than 100 countries. The Hunter Douglas Group employs about 23,000 people worldwide.

Hunter Douglas Holdings Limited is an Australian incorporated wholly owned subsidiary of the international Hunter Douglas Group and its subsidiary companies include: Hunter Douglas Limited, Vertilux Corporation Pty. Ltd. ATF Vertilux trading Trust, Victory Curtains & Blinds No. 2 Pty Ltd and Blindware Pty Ltd. It commenced manufacturing in Australia in 1954 and is the largest supplier of window coverings in Australia. Its head office is located at Rydalmere in Sydney. We have a total of 419 team members located across Australia.

Hunter Douglas’ vision is to manufacture high quality window furnishings to custom Australian homes and commercial spaces from our Rydalmere, NSW, Yatala, QLD and Keilor Park, VIC assembly facilities. Hunter Douglas’ window furnishing products are sold under well-known brand names such as Luxaflex® Window Fashions and are distributed through our Luxaflex Window Fashions Gallery dealers in Australia for sale to consumers. Hunter Douglas also manufactures for commercial customers using the Vertilux and Quattro Shading brands, as well as having a direct to consumer brand in Victory Curtains and Blinds.

Hunter Douglas operates an extensive textiles manufacturing facility at Rydalmere, producing fabrics for Blinds, Sunscreens and Awnings.

Hunter Douglas delivers high quality and technically superior window covering components to independent fabricators who assemble the components into finished products for sale to consumers.

We have developed a dependable reputation and are proud to have achieved sustainable growth on a national scale.

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As well as our assembly locations in NSW, QLD and VIC, we also supply products to our Luxaflex® Alliance dealers and to third party unbranded retailers and licensees.

We source product from approximately 600 local and overseas suppliers, which produce product in their own, or contracted third party, supplier factories located in Australia and overseas.

3. Modern Slavery Risk

Hunter Douglas has assessed its modern slavery risks with reference to a number of modern slavery risk indices, including the Walk Free Foundation Global Slavery Index, and information supplied to us through our extensive stakeholder networks (e.g. customers, suppliers, licensors, industry associations and governments).

3.1 Operations

In FY 2021, Hunter Douglas assessed the risk of modern slavery in our direct business operations to be low. Hunter Douglas has a robust system of HR policies and procedures that ensure compliance with legally mandated employment entitlements and awards across our workforce. The policies apply to all Hunter Douglas operated offices and facilities in Australia.

3.2 Supply Chains

Hunter Douglas recognises that through the window furnishing products we source from our third party supplier factories and local suppliers, we can be exposed to the risk of modern slavery in the manufacturing process both in Australia and overseas.

The Global Slavery Index has identified a shortlist list of 15 imported products common in G20 countries, such as Australia, which present a heightened risk of forced labour. While Hunter Douglas' primary product (window furnishings) does not appear on the list, raw materials and components used in window furnishings relate to three products on the short list as set out in the table below.

| Global Slavery Index: Products at Risk of Forced Labour | Potential Hunter Douglas Supply Chain Product Exposure |
|--|---|
| | |
| Electronics | Electronic components used in motorised window furnishings |
| Cotton | Cotton fabric used in manufacturing of window furnishings (eg curtains) |
| Timber | Timber based window furnishings |

4. Risk Mitigation Actions

The need to manage the risk of modern slavery in our supply chain is a key consideration behind the design of the Hunter Douglas Ethical Sourcing Program. The program is applicable to all Suppliers including Suppliers of the products we sell to our dealers and customers, the goods we use in our own operations and our service providers.

Key elements of the program include:

- A comprehensive Hunter Douglas Supplier Code of Conduct, which includes the minimum sourcing standards that all Suppliers must meet as a condition of doing business with Hunter Douglas. The Code contains specific wording prohibiting conduct associated with modern slavery, including child labour, forced labour, human trafficking, non-compliance with local wage laws and unauthorised subcontracting.
- Code compliance declarations that must be signed by all Suppliers.
- A whistle-blower line (compliance@hunterdouglas.com.au) through which any person, including workers of a Supplier, may report actual or suspected Code violations.
- A robust audit and monitoring program that requires Hunter Douglas supplier factories to have an approved ethical sourcing audit prior to onboarding and renewed at least every two years.
- Due diligence processes applicable to onboarding new local Suppliers, designed to ensure their factories comply with ethical sourcing standards that, at a minimum, meet the Hunter Douglas standards.
- Staff training.
- A Standard Operating Procedure documenting the Hunter Douglas Ethical Sourcing Program's governance structure, program objectives, and internal roles and responsibilities.

5. Assessing Effectiveness

Responsibility for assessing and addressing Hunter Douglas' modern slavery risks occurs under the direct oversight of the Managing Directors. Hunter Douglas' overall modern slavery risk management approach is reviewed at least annually.

6. Consultation with our Group Companies

Hunter Douglas is committed to working with non-government organisations, its employees and their representatives, external auditors and its associated entities to improve its modern slavery response.

Hunter Douglas seeks to work alongside its suppliers and employees to ensure it is always aware of modern slavery risks in its supply chain, and to ensure it does not inadvertently engage with modern slavery practices. Ultimately, measures taken by Hunter Douglas enable it to adequately address and mitigate the modern slavery risks identified in its operations, supply chains and industry.

Hunter Douglas and its associated entities work in collaboration to ensure the Company's personnel are aware of their obligations under the Modern Slavery Act. The Company currently conducts monthly management meetings with its Executive Team to provide education and training in how to address modern slavery risks. These meetings are attended by representatives from all the Company's associated entities, and are used to address departmental reports, financials, ISO27001 and Modern Slavery compliance.

Hunter Douglas is committed to including Modern Slavery compliance as a specific agenda item for all monthly Executive Team meetings moving forward.

In addition, Hunter Douglas has shared publicly available educational videos with its Executive Team to raise awareness and education among its Team Leaders in relation to Modern Slavery risks and compliance.

7. Future Actions to Address Modern Slavery Risks

In the next financial year, Hunter Douglas has committed to continuing to monitor, assess, and engage with its supply chains to ensure it remains compliant with the Modern Slavery Act.

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This Statement was approved by the principal governing body of Hunter Douglas Holdings Limited on 31 January 2022.



Anthony Nicolas Politis
Director



Peter William Hughes
Director



Damon Steven Gardner
Director