



## Modern Slavery Statement for Whites Group – Year ended 30 June 2024

Whites Group Pty Ltd ABN 25 001 845 478 (Whites Group), including its subsidiary Design Flow Pty Ltd ABN 16 098 602 790 (Design Flow) are wholesalers and manufacturers of hardware, rural and industrial goods. It operates six distribution centres across Australia and has manufacturing plants in Melbourne and Albury NSW. Whites Group sells products to a diverse range of resellers across Australia. Our supply chain network includes both our own facilities and more than 50 factories primarily in China and Vietnam. Raw materials also generally originate in these countries or Australia.

During the 2024 reporting period, we fully integrated our Design Flow subsidiary into our Whites Group business structure, and as such this statement covers both Whites Group and Design Flow supplier base.

Whites Group Pty Ltd is owned by Tolranga Pty Ltd, which acts only as a holding company and does not have any outward facing operations.

Whites Group strongly opposes modern slavery and, in this statement, outlines our approach to minimising the risk of modern slavery in our business and its supply chains.

### Governance of Modern Slavery

Whites Group has set up several measures in respect to the governance of modern slavery:

- a) **Supplier Code of Conduct**  
Whites Group has developed a Supplier Code of Conduct which sets out clear parameters as to the expectations and requirements of suppliers which includes a framework regarding Modern Slavery.
- b) **Audit system**  
Our key suppliers (Tier 1) are subject to external audits by accredited agencies such as SEDEX and BSCI to ensure compliance with our policy and legislation. Other suppliers (Tier 2) are subject to strong internal audits conducted by our partner China Office to ensure compliance to the policy.
- c) **Training**  
The Executive and the Directors of Whites Group have received training in the legislation and Whites policy with respect to Modern Slavery. Whites Group has revised the employee code of conduct to include reference to Modern Slavery.

### Monitoring of Modern Slavery ongoing

Whites Group has set up the following steps to monitor the effectiveness of our governance of modern slavery

- Review of audits from suppliers and appropriate follow ups
- Spot checks on suppliers with physical visits either by Whites staff or our partner China Office. There were a total of 4 separate visits to China during Financial Year 2024 involving various senior Whites executives. Our partners in China also routinely visit factories to ensure our commitment to minimising Modern Slavery risks.
- Regular communications and reviews with suppliers, including an ongoing commitment to the Whites Group Supplier Code of Conduct
- Any potential new supplier(s) needs to demonstrate an equivalent commitment to address any Modern Slavery risks.

**CENTRAL OFFICE**  
2B / 201 Power St  
Glendenning NSW  
2761

**SYDNEY**  
2B / 201 Power St  
Glendenning NSW  
2761

**MELBOURNE**  
25 Glasscocks Rd  
Dandenong South VIC  
3175

**BRISBANE**  
4/15 Seanna Place  
Heathwood QLD 4110

**TOWNSVILLE**  
13 Crocodile Crescent  
Bohle QLD 4818

**ADELAIDE**  
18 Bradford Way  
Cavan SA 5094

**PERTH**  
53 Collopy Road Perth  
Airport WA 6105





## FY2024 Risk Assessment

During this reporting period we analysed our Supply Chain to identify any modern slavery related risks. Through our ongoing assessment, we again identified areas with the lowest risk, such as local operations handled by staff employed by Whites Group, and also large overseas operations that have been certified by accredited agencies (tier 1 suppliers). Any risks such to WHS, Ethical Operating Practices, Human Rights and Diversity are minor for these two levels of suppliers.

The majority of our remaining overseas operations are constantly reviewed by employees with our China Regional Office and also an internal audit process (tier 2 suppliers). We believe the risk here is minor also, although we are committed to reducing any modern slavery risks within our Supply Chain. During FY2024, physical spot checks were completed by Whites Group staff on various factories in China. Our China Office partners continue to review any modern slavery risks with all factories and communicate on any issues or concerns monthly with Whites Group staff in Australia.

Less than 1% of our supply chain are now not classified as local, tier 1 or tier 2 suppliers. For the remainder of our tertiary level supply chain partners, we have limited interaction and presence but continue to monitor through our supply network.

## Our Commitment

We have an ongoing and evolving process to address any modern slavery risks. We set ourselves annual goals which are reviewed throughout the year to assess the effectiveness of our approach and course correct where required.

This Modern Slavery Statement covers Whites Group Pty Ltd, its subsidiary Design Flow Pty Ltd, and its holding company Tolranga Pty Ltd.

The Directors of Whites Group and Tolranga have a strong intent to combat Modern Slavery in all its forms and are committed to meeting our obligations under the Australian Modern Day Slavery Act 2018.

This statement was approved by the Board of Whites Group and its holding company Tolranga on the 5<sup>th</sup> of December 2024.

  
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Mark Jones - C.O.O.  
Whites Group Pty Ltd

Date 16 / 12 / 2024

  
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Michael Kelly - Director  
Whites Group Pty Ltd

Date 16, 12, 2024