

# Modern Slavery Statement 2022



**This is our third Modern Slavery Report. In it we outline our ongoing commitments and progress towards preventing and addressing modern slavery in our operations and supply chain.**



Reece acknowledges the Traditional Custodians of Country throughout Australia and their continuing connection to land, culture and community. We pay our respects to Elders past, present and emerging.

<b>Letter from the CEO</b>	<b>1</b>
<b>Reece At A Glance</b>	<b>2</b>
<b>Our Modern Slavery Approach</b>	<b>3</b>
<b>Modern Slavery Governance</b>	<b>4</b>
<b>Our Supply Chain</b>	<b>5</b>
<b>Risks of Modern Slavery</b>	<b>6</b>
<b>Managing our Modern Slavery Risks</b>	<b>8</b>
<b>Assessing Our Actions</b>	<b>12</b>
<b>Our Progress and Commitments</b>	<b>13</b>
<b>Appendix 1 – Controlled Entities</b>	<b>15</b>
<b>Appendix 2 – Mandatory Reporting Criteria Index</b>	<b>15</b>

#### **About this report**

This is a joint statement on behalf of Reece Limited and its subsidiaries ('Reece' or 'the Group') under the Australian Modern Slavery Act 2018 for the period 1 July 2021 to 30 June 2022 (FY22). The report covers Reece and its controlled entities which have been engaged and consulted in the development of this report and are listed in Appendix 1. It outlines the approach the Group took to identify, assess, mitigate and remediate Modern Slavery risks in its operations and supply chain during FY22 .

The statement has been approved by the Reece Limited Board and should be read in conjunction with our 2022 Corporate Governance Statement and our 2022 Sustainability Report.



# Letter from the CEO





At Reece, we are a purpose and values led business. We call this living The Reece Way and it guides the decisions we make every day, including our approach to modern slavery.

As a business, we aim to have a positive impact on our customers, our people and the communities where we operate. We oppose all forms of slavery and forced labour in our operations and supply chain. This report outlines the progress we made on modern slavery in FY22, and our objectives looking ahead.

We still have much to do in this area. We also recognise that our business in the Australia and New Zealand region will continue to be further ahead in its approach than our US business. We only moved into the US in 2018, where we are taking a long-term approach, focussing on transforming the practices, processes and operations of the business. This will take some time, but we will do it with our values front and centre to guide us.

Across both regions, we will refine our approach, deliver continuous improvement and work towards maintaining an ethical and sustainable supply chain.

A handwritten signature in black ink, appearing to read 'Peter Wilson'.

Peter Wilson  
Group Chief Executive  
Officer

## Business Highlights

# Reece at a glance

A market-leading distributor of plumbing, HVAC-R and waterworks products to commercial and residential customers.

### Founded

1920

### Growth and leadership

100+ yrs

### Team members

9000+

### Nationwide footprint in Australia

1997

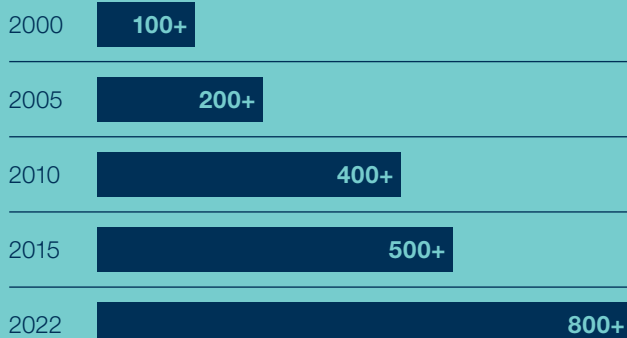
### Entered New Zealand

2006

### Entered US

2018

### Growing our branch footprint (branch numbers)



### Our customers

Our business was built on serving the SME trade plumber. Today our customers include:

- SME trade
- Commercial trade
- Large homebuilders
- Civil projects and government bodies
- Commercial developers
- End consumers



## An international footprint

### ANZ FY22 Revenue

\$3,518m

### ANZ Branches

645

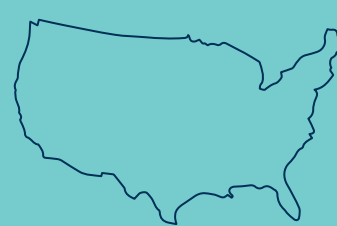


### US FY22 Revenue

\$4,136m

### US Branches

201



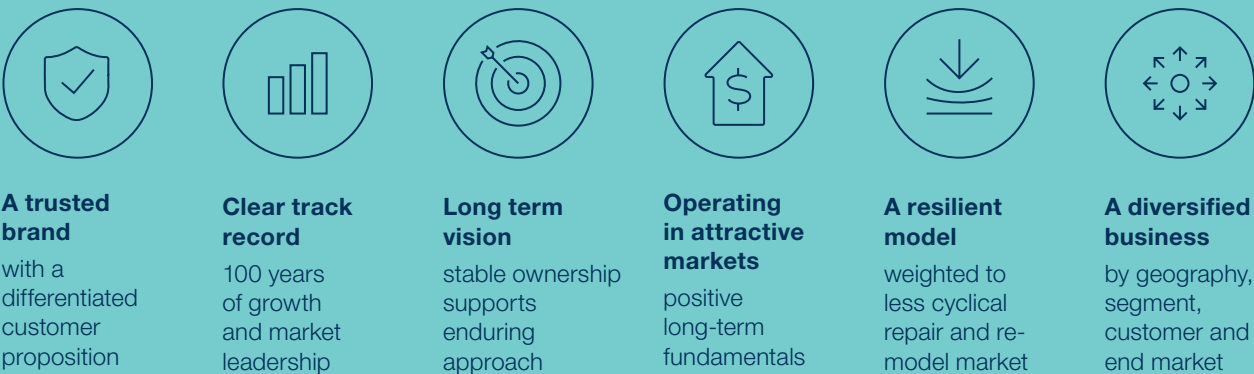
All figures in this report are in Australian dollars, unless otherwise stated.

\* Heating, ventilation, air conditioning and refrigeration

A multi-dimensional business



A market-leading distributor



# Our Modern Slavery Approach

As a large and complex business with a significant global supply chain, we know we are exposed to modern slavery risks.

We approach modern slavery guided by our Purpose and Values, the same way we do everything at Reece. It forms part of our wider commitment to build sustainable ways of working and have a positive impact in our business and our communities.

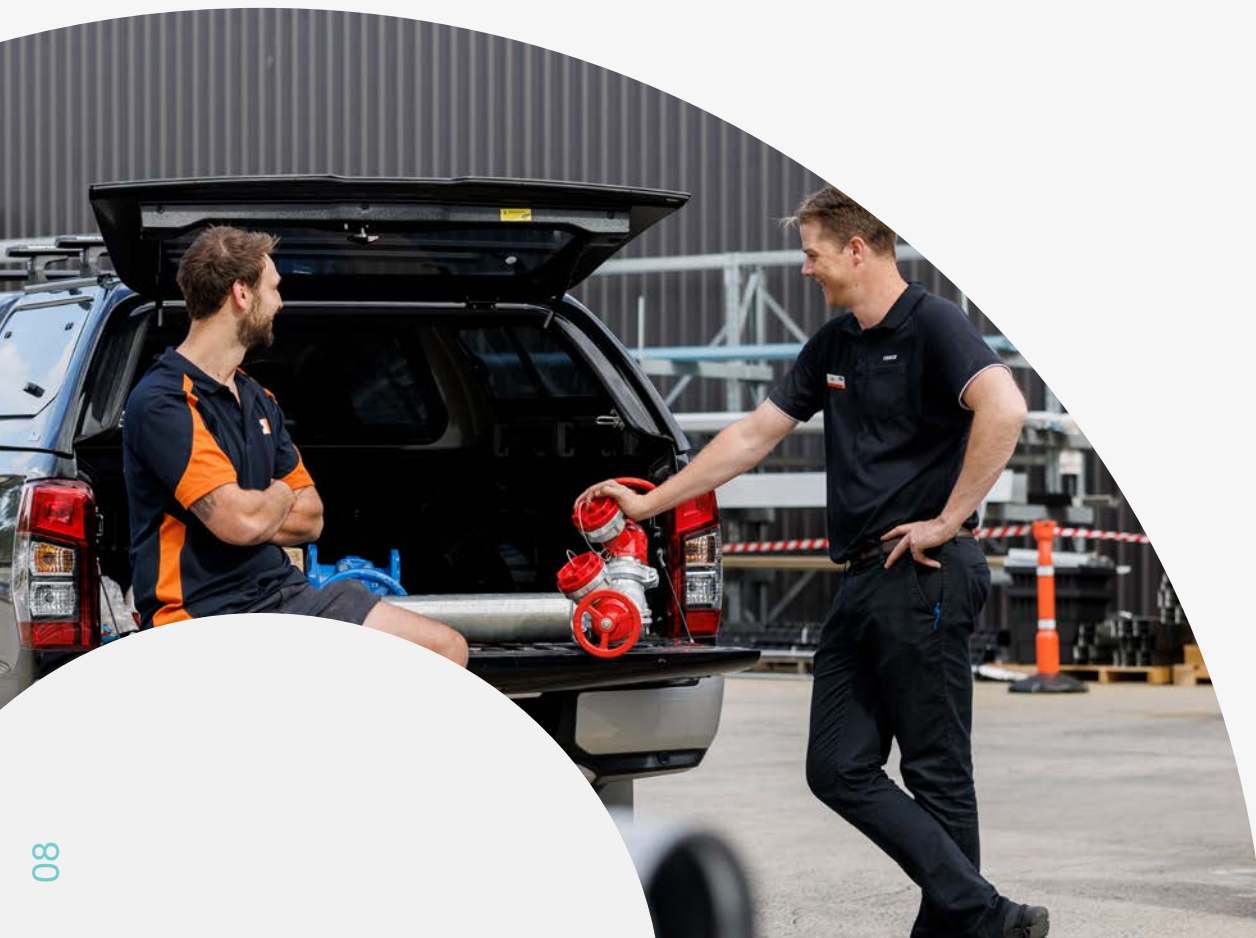
For over 100 years we have taken a partnership approach with our suppliers. Product quality is critical to the delivery of our customer promise, so we look to engage with high quality suppliers through long-term agreements. This helps to foster an environment where modern slavery risks can be reduced. We set clear expectations around standards of conduct, quality, safety and governance.

Our markets of Australia and New Zealand and the US are very different, and the nature of our supply chains and modern slavery practices and processes at this stage reflect these differences.

In Australia and New Zealand (ANZ), we are a mature business with a sophisticated supply chain and deep, long term supplier relationships. We are also in a market leadership position across most categories, which increases our ability to take an active position on this important topic.

In the US, we have been operating for a much shorter period of time, with a less mature supply chain and a more fragmented and competitive market setting.

Our business strategy in the US is to invest to build a sustainable long-term growth platform. This involves a significant program of network expansion, team development, and supply chain development. We know we need to take a proactive approach towards modern slavery to ensure we embed practices that effectively manage risks from the outset as we deliver this strategy, but recognise this will be an ongoing process.





## Our Purpose & Values

To improve the lives of our customers and our people by striving for greatness everyday.



**Create  
customers  
for life**



**Discover  
your best**



**Grow as  
a team**



**Innovate big  
and small**



**Try. Try. Try.**



**Own it**



**Keep it  
simple**



**Do the  
right thing**



**Be humble**



**Write the  
next chapter**

# Modern Slavery Governance

We know that strong governance practices are an important part of achieving our modern slavery goals.

The Reece Limited Board (the Board) primarily analyses modern slavery through the Audit and Risk Committee (ARC). In FY22, modern slavery was discussed at four ARC meetings, including one attended by the full Board where an update on global modern slavery legislation and reporting expectations were presented by KPMG Banarra. The Board also completed a risk appetite assessment which included modern slavery-related scenarios.

Our regional CEOs receive updates every two months from the teams responsible for assessing and managing modern slavery risks in their respective regions.

Our cross discipline ANZ working group on modern slavery meets at least monthly and comprises team members from areas including legal, non-stock procurement, merchandising, supply chain, compliance, people experience and sustainability. This group provides regular updates to the senior leadership team, ARC and the Board.

In the US, we are currently actively focused on our stock supply chain as we remain in the earlier stages of formalising our modern slavery approach. Our Merchandising team is responsible for implementing our agreed modern slavery priorities. Members of the ANZ working group also meet with the US team to share best practice, learnings and assist to develop future plans and priorities.

Policies and documents relevant to managing modern slavery include:

- Our supplier expectations guides (ANZ and US)
- Code of Conduct (ANZ)
- Anti-Bribery and Corruption (ANZ)
- Whistleblower policy (Group)
- Regulatory Compliance policy (Group)

Our policies were updated in FY22, approved by the Board and rolled out to the business.

## Sustainability oversight at Reece

Modern slavery falls under our overarching sustainability governance processes.

### Business teams

in each region deliver discrete work to support sustainability aims

### Group and Regional CEOs

accountable for the execution of the sustainability strategy

### Board oversight

the Board has overseen the development of our sustainability strategy. Sustainability is a standing agenda item at Board meetings.

### Cross-discipline working groups

formed on key sustainability actions to deliver projects

### Risk monitoring

ESG issues form part of our material risk monitoring and assessment program



# Our Supply Chain

We aim to work in a collaborative way with our suppliers, prioritising building a trusted long-term partnership.

We have a large and complex global supply chain that underpins our success as a business. We source a significant proportion of our product domestically in markets where we operate, and the remainder from various international markets including Asia, Europe and Central America.

Merchandising and operations support teams procure our goods and services and appoint approved suppliers. To a lesser extent procurement activity can be carried out by operational teams directly.

We are proud of our long-standing relationships with our suppliers, many of which have been in place for decades. We have always approached these relationships on a constructive long-term basis, and, guided by our values, we take important issues like working conditions very seriously.

Our supply chain generally falls into three categories:

1

## Products for sale

may include plumbing, bathroom, kitchen, heating and cooling and pipe products for residential, large volume home and civil projects.



2

## Products to support group operations

may include IT equipment, electronics, and software to support Reece Group operations, fleet and retail store fit out requirements.



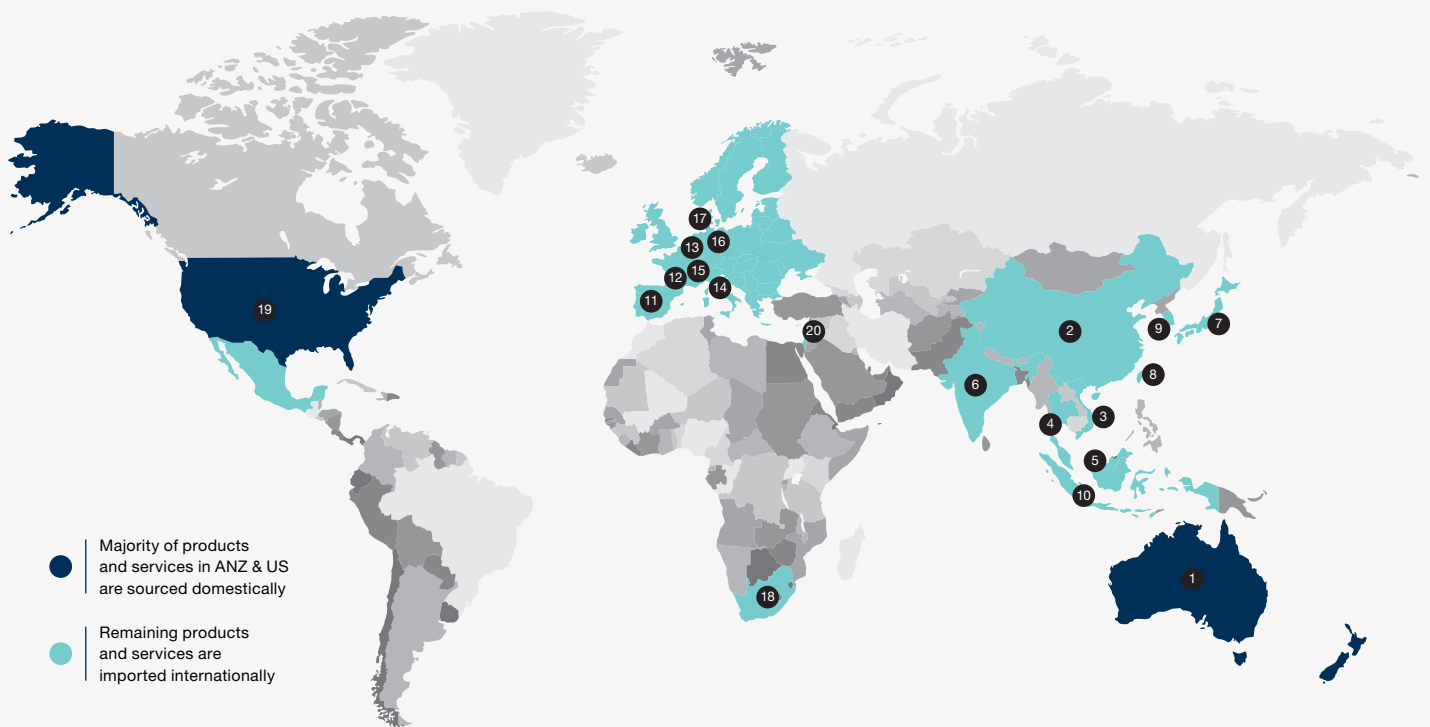
3

## Services purchased to support operations

may include cleaning services, construction services or consulting services.



## Locations of tier 1 Suppliers of Products for Sale



<b>1 Australia</b> Copper Pipe & Fittings, Hotwater System, Drainage Products, Plastic Piping Systems, Metal Pipe & Fittings, Roofing Products, Refrigeration Products, Sanitaryware, Tapware, Showers, Vanities, Concrete Products, Rainwater Storage, Pool Products, Irrigation Products.	<b>2 China</b> Metal Pipe & Fittings, Plastic Fittings, HVAC, Refrigeration, Sanitaryware, Bath, Tapware, Showers, Sinks, Trough.	<b>5 Malaysia</b> Refrigeration	<b>10 Indonesia</b> Sanitaryware	<b>14 Italy</b> Tapware, Sanitaryware, Pumps, Heating	<b>18 South Africa</b> Irrigation
<b>3 Vietnam</b> Copper, Furniture	<b>4 Thailand</b> Sanitaryware, Refrigeration	<b>6 India</b> Sanitaryware, Cast Iron	<b>11 Spain</b> Copper fittings, Valves, Sanitaryware, Tools	<b>15 Switzerland</b> Piping Systems	<b>19 USA</b> Piping Systems
		<b>7 Japan</b> Hot Water	<b>12 France</b> Tapware, Sanitaryware	<b>16 Poland</b> Copper & Brass Fittings, Valves	<b>20 Israel</b> Fittings
		<b>8 Taiwan</b> Tools, Hardware, Technology	<b>13 Germany</b> Piping Systems, Tools, Tapware	<b>17 Denmark</b> Valves	
		<b>9 Korea</b> Cast Iron			



# Risks of Modern Slavery

We use the UN Guiding Principles concepts of cause, contribute and direct linkage<sup>1</sup>, to define our connection to modern slavery risks.

Our Modern Slavery Working Group monitors our exposure to modern slavery risks, including (but not limited to):

- External factors that can exacerbate modern slavery risks in affected geographies, such as COVID-19, geopolitical conflicts and extreme climate events.
- Regulatory trends, such as the US Uyghur Forced Labor Prevention Act, EU proposed Forced Labour Ban and the Australian Government review of the Modern Slavery Act.
- Supplier screening and supplier audits.
- Desktop risk assessment of our existing supplier base
- Modern slavery statements or public disclosures produced by peers and suppliers.
- Guidance from subject matter experts engaged throughout the reporting period

1. See UN Guiding Principles on Business and Human Rights.



## Risks in our operations

Over 90% of our workforce are employed directly through Reece under the relevant laws in their regions. 93% of these employees are on full time contracts, ensuring secure work. The remainder are contractors who work primarily in our distribution network and technology teams. Contractors are primarily based in Australia, with a smaller proportion in New Zealand, the US and countries in Asia and Central America.

We have a high level of direct oversight over our workforce and operations, meaning we can instil our purpose and values-led culture and enforce policies and controls that protect from harm. As a result, we consider risk of modern slavery in our team to be relatively low.

Our employment process ensures we do not employ anyone below the legal working age. Our school-based apprenticeship offering in Australia, tailored to current year 11 and 12 students, is higher risk, mitigated by verifying ages through our third part training partners to comply with legal requirements and ensure a safe working environment.

We are alert to potentially higher human rights risks for contractors operating in certain geographies, but seek to maintain a high-level of direct oversight and appropriate controls to offset this.

We acknowledge we could be directly linked to modern slavery through other aspects of our operations, for example in our innovation division which includes early-stage investments in services and technologies, donations to non-profits and leasing of Reece-owned properties. We review how we can best protect against risks in these and other areas as part of our ongoing modern slavery work.

From time to time we conduct strategic acquisitions and integrate them into our operations. We conduct thorough due diligence processes prior to acquisition, including reviewing operational practices or visiting sites. Post-acquisition, we work with the company to incorporate the Reece ways of working, including upholding the standards we expect within our direct operations and supply chain, and through this process are able to assess and reduce risks of modern slavery.

## Risks in our supply chain

Given the complexity of our supply chain, we recognise direct links to modern slavery risks could exist through our extended supply chain. Geographically, regions with underlying drivers like poor governance, conflict, poverty and geopolitical upheaval may present particular risks for us, for example in Asia, Poland and Mexico.

Certain product and service categories will also pose specific risks, often due to their processes, business models or use of vulnerable, base-skill or outsourced workforces.

In our supply chain, categories that may have higher risk for modern slavery include:

- Garments, including merchandising apparel and uniforms
- Cleaning and facilities services
- Construction
- Electronics, including sub-components of hot water and HVAC products
- Products containing high-risk commodities such as timber, copper and brass

The majority of our tier 1 stock suppliers<sup>2</sup> specialise in assembly or finalisation of finished product or manufacturing from purchased raw materials. Deeper within our supply chain, the extraction of raw materials and lower end manufacturing presents a greater risk.

2. Tier 1 suppliers provide products and/or services directly to Reece.

# Managing our Modern Slavery Risks

It can be challenging to identify explicit instances of modern slavery, particularly beyond tier 1 suppliers where we have less direct control and oversight.

While we know we cannot eradicate modern slavery risk, our best defence against it is our long term relationship with suppliers, which is based on building a constructive partnership together. This reduces the likelihood of risks going undiscovered or inadvertently creating the conditions for modern slavery to arise.

To manage our risks, we aim to follow an assess, mitigate and remediate process.



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## Assess

### Supply Chain Transparency

Understanding our supply chain is a key step in identifying and preventing risks to human rights. This remains a core focus for Reece, with different business areas and regions at different stages in the process. Assessing risks in our supply chain will remain a continuous effort.

As part of this process in FY22, our ANZ Merchandising team completed a desktop risk rating for our top suppliers covering 80% of our supplier spend. Risk was assessed based on a number of criteria including:

- Geographic risk
- Entity ownership, employment structure and use of subcontractors.
- Likely risk based on commodity, product or industry

This process highlighted that suppliers with outsourced or subcontracted labour could present higher risks of modern slavery. We seek to engage with these suppliers to monitor and encourage their human rights approach.

In FY23, our ANZ Procurement team will undertake a risk assessment on high-risk and high-value corporate services categories, in line with our risk management framework.

In the US, our Merchandising team have mapped where 80% of tier 1 suppliers are manufacturing to understand geographic risk of modern slavery. Our top 50 suppliers representing 65% of spend have provided documentation to demonstrate their own approach to managing responsible supply chains. This includes Supplier Codes of Conduct and Californian Transparency in Supply Chain Disclosure Statements, a legal requirement for certain businesses in the US. This allows our team to assess risk based on our suppliers current approach to these issues.

### Supplier screening and onboarding

All teams are expected to take a risk-based approach to procuring goods and services and to uphold standards which prevent modern slavery when onboarding new suppliers, through supplier screening or due diligence processes.

### Our Approach to Supplier Audits

We have been conducting supplier audits to ensure proper working conditions and standards are met for many years. Our approach will continue evolving as we increase our knowledge and understanding of best practice in modern slavery. We focus supplier audits on international suppliers, where we have less direct oversight and higher modern slavery risk. Specifically, we focus on Asia, as this is considered our highest risk geography for safety, quality and human rights and a large sourcing market for our ANZ business.

We have a dedicated overseas sourcing team based in Australia who oversee formal factory and site audits for potential and existing tier 1 Asian suppliers for both ANZ and the US, where relevant. Supplier audits are conducted either by Reece personnel or by a third party. Our approach has been informed by ISO 9001 standards and extended to include considerations for human rights.

Outside the restrictions of COVID-19 over the past 2 years, all potential Asian suppliers are audited as part of our supplier due diligence process and existing Asian suppliers are audited every 2 years to allow for regular monitoring of their commitment to our expectations. Where appropriate, Reece will also accept an audit report from an accredited third-party agency such as BSCI or SEDEX if completed within 12-months of Reece wanting to perform the audit, subject to its validation and corrective action plans.

From a human rights perspective, our audits involve a physical walk-through and review of all working areas of a facility, and cover broad questions including working conditions, hours and wages, health and safety, presence of child labour and use of sub-contracting.

We oppose all forms of modern slavery, including forced labour, human trafficking and child labour. Our preference is to work with suppliers on a partnership basis to eradicate risks and, if identified, resolve any modern slavery risks appropriately before ceasing work with a supplier.

### Audits in FY22 and future plans

Our audit processes were necessarily on hold for parts of the past two years due to COVID-19, but commenced again during FY22.

Reece or our third-party auditors conducted 17 audits in FY22, including 7 existing tier 1 suppliers and 10 tier 2 sub-contractors or potential tier 1 suppliers. Due to our high level of oversight and clear expectations of suppliers, no suppliers are currently on corrective action plans pertaining to human rights risks.

In FY23, the ANZ Merchandising team will review our current site audit process in line with best-practice social audit methodology, to identify opportunities to improve our approach and collaborate with our supplier partners to protect the workforce in our supply chain.

Beyond our formal supplier audit process, we also conduct extensive supplier site visits in line with our long-term partnership approach.

## Impact of COVID-19 in FY22

COVID-19 remained an issue in FY22, with many of our operations and parts of our supply chain in lockdown for portions of the year. In-person site audits recommenced via third-parties in November 2021, and in May 2022 with Reece personnel when they could safely resume travel. The impact of COVID-19 gradually reduced throughout the year and, should current conditions remain, we would anticipate returning to almost normal conditions and practices in FY23 with the exception of any regions with a Zero-Covid policy. We acknowledge that COVID-19 increased existing vulnerabilities and created new ones, which will require careful ongoing review and management.

## Mitigate

Our current mitigation approach focuses on establishing awareness with our suppliers and building capacity across our teams.

### Working with our suppliers

In FY22, we continued to focus on raising awareness of modern slavery risks and Reece's expectations throughout our supply chain.

Our actions included:

- Providing Trading Agreements and Terms & Conditions to suppliers, outlining our expectations regarding modern slavery and repercussions for non-compliance.
- Modern Slavery Declaration for suppliers in the event they had not signed a new Trading Agreement as an alternate form of confirming compliance.

In ANZ, this work has been focused on the top 80% of suppliers by spend. Trading agreements with modern slavery considerations or signed modern slavery declarations have been received by 100% of overseas stock (up from 98%), 77% of domestic stock (up from 74%) and 99% of non-stock suppliers (up from 41% in FY21).

Our ANZ Procurement team is starting a region-wide rationalisation program for our non-stock procurement, which will consolidate the number of suppliers we deal with and grant us greater leverage and controls. As part of this program, our New Zealand and Australian master services agreements will be updated with strengthened human rights requirements.

In FY22, our Compliance team undertook a review of our ANZ documentation process across stock and non-stock procurement. The review encompassed both Stock (>\$1M) and Non Stock Suppliers (>\$300K) to ensure either a signed agreement with terms and conditions outlining Reece expectations regarding modern slavery and repercussions for non-compliance, or a Modern Slavery Declaration for suppliers was submitted in the event that they had not signed a new agreement.

The review identified opportunities to improve our documentation and supplier engagement processes.

Following this process, in ANZ we are:

- Introducing modern slavery as a standing agenda item for strategic stock suppliers and corporate services non-stock suppliers. We will assess the feedback from this process at the end of FY23 before expanding to additional suppliers.
- Strengthening our capability to be proactive by training staff within Reece on modern slavery (see below).
- Exploring opportunities across stock and non-stock to support centralised data capture for supplier information.

Learnings from these activities will be shared with the US team to help with the region's future implementation.

In the US, as outlined above, all new overseas suppliers from FY22 were onboarded on Supplier Trading Agreements that include modern slavery and responsible sourcing declarations, and our top 50 domestic suppliers have additionally supplied either copies of their Californian Transparency in Supply Chain declaration or supplier code of conduct. The US Merchandising team will continue to engage with more of our suppliers and obtain these details over FY23.


The US Merchandising team also began rolling out our new Supplier Expectations Guide in FY22, which contains greater clarity on our expectations regarding the human rights of workers in our supply chain. This was distributed to our top 100 suppliers by spend, with in-depth engagement and seeking of feedback from our top five suppliers by spend.

## Growing as a team

In FY22, the ANZ Modern Slavery Working Group partnered with The Freedom Hub, a social enterprise that provides Australian survivors of modern slavery with long-term support, to deliver a training workshop with key roles. Training covered the impact of modern slavery, techniques to define and assess modern slavery risks and mitigation approaches. The session was attended by over 40 participants. 90% of workshop attendees who responded to a follow-up survey shared they better understand how modern slavery was relevant to their role at Reece.

From FY23, we are seeking to extend this initial training program by incorporating modern slavery into our annual compliance training program in ANZ. This program is being refreshed and deployed over 2023 for all staff. The US team will also initiate modern slavery awareness training for their team in FY23.





“The biggest takeaway for me was just how prevalent modern slavery can be... it’s much bigger than just ensuring the factory producing the finished good is doing the right things.”

Workshop participant, ANZ Merchandising team.

## Remediate

We are committed to providing access to trusted, accessible grievance mechanisms and remediation as part of our work to eliminate modern slavery but know we have more work to do in this area.

Our aim is to work in a constructive way to address, remediate or eliminate issues which are raised, working on a case-by-case basis.

We have a confidential hotline service, PIPE UP, which is available to current and former staff, contractors and the public as part of our Whistle Blower Policy. The hotline is managed by an independent third party and is available through phone, online, text or email.

In FY22, we extended PIPE UP services to workers within our supply chain. Information on how to access our confidential hotline was included in the FY22 update of our Supplier Expectation Guides in both regions. We will now shift focus to including supplier-related incidents to our current grievance mechanism process flow and communicating the availability of our hotline to suppliers and relevant supplier-facing teams.

We recognise that making effective channels accessible to workers deeper within our supply chain is challenging and encourage our suppliers to establish their own mechanisms to support their stakeholders.

In FY22, no instances of suspected modern slavery were raised through the hotline service PIPE UP, or through other channels such as direct to Reece staff or identified through audits.

# Assessing Our Actions

To better understand the impact of the actions we take against modern slavery in our supply chain, the ANZ working Group developed an effectiveness scorecard in FY22. The findings from the measurements gathered in FY23 will be used to score and continuously improve upon how we identify, assess, address, and proactively manage modern slavery risk within our supply chain.

In the future, our US business will leverage the ANZ effectiveness scorecard and implement their own version to apply to assessing actions taken against modern slavery in their supply chain.

## Effectiveness Scorecard

Focus Area	Outcome	Measures of Effectiveness
<b>Governance</b>	All levels of the business have appropriate oversight of modern slavery risks and business actions to mitigate.	<ul style="list-style-type: none"> <li>- Frequency of the Working Group Meeting</li> <li>- Frequency of modern slavery being an Audit and Risk Committee agenda item</li> <li>- Completion of 6-month updates to Operations leaders.</li> </ul>
<b>Risk Assessment</b>	Reece is aware of salient risks within our supply chain	<ul style="list-style-type: none"> <li>- % stock from strategic suppliers assessed for salient modern slavery risk</li> <li>- % non-stock from strategic suppliers assessed for salient modern slavery risk</li> </ul>
	Reece has oversight over the operational and supply chain risks of our strategic suppliers	<ul style="list-style-type: none"> <li>- % strategic suppliers by spend receiving audit (either by Reece staff or 3rd Party)</li> <li>- % suppliers located in jurisdictions where modern slavery acts are in place</li> <li>- Modern slavery risks incorporated into broader business risk framework</li> </ul>
<b>Risk Mitigation</b>	Our people are aware of modern slavery risks, and have the capability to identify and address risks as they occur	<ul style="list-style-type: none"> <li>- % Employees completed general awareness training (Operations and support centres)</li> </ul>
	Our suppliers are aware of their responsibilities to identify, mitigate and report modern slavery risks	<ul style="list-style-type: none"> <li>- % strategic suppliers signed Modern Slavery Declaration Form or equivalent</li> <li>- % new contracts entered within reporting period that include appropriate modern slavery provisions</li> <li>- % strategic suppliers under continuous audit program</li> </ul>
	We have trusted relationships with experts in the space who support and guide our approach	<ul style="list-style-type: none"> <li>- Panel of external parties. Legal, industry experts etc.</li> </ul>
<b>Remediation</b>	Grievance mechanisms are available to people within our operations and supply chain	<ul style="list-style-type: none"> <li>- Grievance mechanisms in place</li> <li>- % UNGP 31 Effectiveness Criteria met by existing grievance mechanism</li> </ul>
	Suspensions of modern slavery are investigated and addressed appropriately	<ul style="list-style-type: none"> <li>- # suspicions investigated</li> <li>- % status (ongoing, unsubstantiated etc.)</li> <li>- Conduct review of supplier audit process.</li> </ul>

\*Strategic supplier = tier 1 supplier for stock and non-stock, assessed via spend

# Our Progress and Commitments

We remain committed to delivering continuous improvement in the way we manage and protect against modern slavery risks in our business. A summary of the progress made on our commitments to date and new future commitments are included below.

Objective	Status	ANZ	US
<b>Existing Commitments</b>			
Refresh the Whistle Blower policy for the Group	Completed	Completed by Group in FY22, with education to raise awareness ongoing.	
Team training	Ongoing	<p>Cross discipline training session with the Freedom Hub held in FY22.</p> <p>Ongoing plans to roll training out across the business via refreshed compliance training program.</p>	Target to commence in 2023.
Supply chain risk matrix assessment	Ongoing	<p>Initial scan in both markets FY22 included:</p> <ul style="list-style-type: none"> <li>- Suppliers covering 80% of spend across stock in ANZ</li> <li>- Top 50 stock suppliers in US</li> </ul> <p>Ongoing work to do to build out understanding. ANZ to complete risk assessment matrix for 1 high-risk category each in stock and non-stock during FY23.</p>	
Update supplier agreements	Ongoing	<p>Updated supplier agreements obtained across top 80% supplier spend as follows:</p> <ul style="list-style-type: none"> <li>- Stock domestic: 76%</li> <li>- Stock overseas: 100%</li> <li>- Non-stock: 99%</li> </ul>	<p>Complete for new overseas supplier agreements.</p> <p>Targeted longer term for domestic suppliers while relationships being embedded.</p>
Update Supplier Expectation Guide	Ongoing	Completed in FY22, with rollout to suppliers ongoing.	
Conduct internal review of supplier screening process	Ongoing	Completed in March 2022, with findings being implemented across relevant business units.	Processes reviewed with ongoing improvements being made
Establish framework to review effectiveness of actions to address modern slavery	Ongoing	Established Modern Slavery Scorecard in FY22. Commence trading in FY23, with ongoing refinement.	Targeting reviewing and adapting ANZ scorecard for US during FY23
<b>Additional Commitments FY23 onwards</b>			
Document and communicate our grievance mechanism	Initiating		Longer term target, focused on implementing earlier objectives in FY23
Establish a Modern Slavery supplier engagement plan	Initiating		As above
Internal review of supplier audit processes	Initiating	Target completing in FY23	As above

# Appendix 1

## Controlled Entities

### Controlled Entities Reece Limited

Reece Australia Pty Ltd  
A.B.N 84 004 097 090

Plumbing World Pty Ltd  
A.B.N. 99 004 910 829

Reece Project Supply Pty Ltd  
A.B.N. 54 100 065 307

Reece International Pty Ltd  
A.B.N. 11 100 278 171

Reece New Zealand Limited  
Company No. 1530569

Actrol Parts Holdings Pty Ltd  
A.B.N. 98 142 644 488

Actrol Parts Finance Pty Ltd  
A.B.N. 21 142 653 889

Actrol Parts Pty Ltd  
A.B.N. 93 142 654 564

A.C. Components Pty Ltd  
A.B.N. 69 134 588 935

Metalflex Pty Ltd  
A.B.N. 18 007 133 057

Metalflex Regional Pty Ltd  
A.B.N. 50 142 651 509

Metalflex (S.A.) Pty Ltd  
A.B.N. 88 084 260 837

Metalflex (W.A.) Pty Ltd  
A.B.N. 98 105 291 263

Air Plus Pty Ltd  
A.B.N. 33 135 270 718

The Creative Plane Pty Ltd  
A.B.N. 50 092 585 058

Viadux Holdco Pty Ltd  
A.B.N. 51 603 303 368

Viadux Bidco Pty Ltd  
A.B.N. 42 603 305 326

Viadux Pty Ltd  
A.B.N. 75 087 415 745

Laddr Finance Pty Ltd  
A.B.N. 52 651 284 187

Hamilton HoldCo, LLC  
Company Number 6843365

Patriot Supply Holdings Inc  
Company number 45-4808005

Patriot Supply Intermediate Inc  
Company number 45-3852987

MORSCO Inc  
Company number 75-0450550

MORSCO Supply, LLC  
Company number 75-2588495

Fortiline, LLC  
Company number 56-2136499

Fortiline, Inc  
Company number 57-0819190

MORSCO Properties LLC  
Company number 86-1262225

MORSCO Properties OK LLC  
Company number 87-2162861

Reece Mexico 1 Inc  
Company number 88-2047430

Reece Mexico 99 Inc  
Company number 88-2039114

### Registered Office

57 Balmain Street  
Cremorne, Victoria, 3121  
Telephone (03) 9274 0000  
Facsimile (03) 9274 0197

### Reece Limited

A.B.N.  
49 004 313 133

# Appendix 2

## Mandatory Reporting Criteria Index

Mandatory Criteria	Location in statement
Identify the Reporting Entity	About this Report, We are Reece
Describe the reporting entity's structure, operations and supply chain	About this Report, We are Reece,
Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Risks of Modern Slavery
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes	Managing our Modern Slavery Risks
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Managing our Modern Slavery Risks
Describe the process of consultation with any entities the reporting entity owns or controls	About this Report
Any other relevant information	Managing our Modern Slavery Risks





