

# MODERN SLAVERY STATEMENT



# Message from the Chief Executive Officer

## Peter Geard

At Dahlsens, we are committed to conducting business with integrity, responsibility, and respect for human rights. As a family-owned business with over 145 years of history, we take seriously our role in ensuring that our operations and supply chains are free from modern slavery.

This Modern Slavery Statement reflects our ongoing commitment to identifying, assessing, and mitigating risks related to forced labour, human trafficking, and other forms of exploitation. We recognise that modern slavery is a complex global issue, and we are dedicated to continuous improvement in our policies, due diligence processes, and supplier partnerships to uphold ethical standards across our business.

Through collaboration with our suppliers, team members, and industry partners, we aim to foster transparency, accountability, and responsible sourcing practices. This statement outlines the steps we have taken, the challenges we face, and our commitment to strengthening our approach year after year.

Thank you for your support as we continue working toward a more ethical and sustainable future.



**Peter Geard**  
Chief Executive Officer  
Dahlsens Family Companies

## Dahlsens Family Companies Operations Overview

Founded by the Dahlsen family six generations ago in 1877, family owned and operated J C Dahlsen Pty Ltd (Dahlsens) is a leading supplier of building materials in Australia, serving residential and commercial builders through Dahlsens, Cairns Hardware, Nortruss Hardware, Gorrkbuy Industrial Supplies and other brands. Together, these businesses create a comprehensive network that delivers quality building solutions across metro and regional markets.

### **Dahlsens** For the Builder.

Dahlsens operates throughout Victoria, New South Wales and ACT providing an extensive range of building materials and services to small-to-medium residential builders and larger-scale projects. With over 40 locations, Dahlsens offers supplies from truss and frame manufacturing to 'whole of house' solutions. The business is known for its customer-first approach, reliable delivery, and expertise in helping builders stay on track with their projects.

#### **Dahlsens Community Support**

Dahlsens is deeply committed to supporting the communities it serves, responding to local needs with generosity and care. Whether providing crucial assistance in the wake of natural disasters such as floods and fires, sponsoring local sporting teams and community clubs, or stepping up to help customers facing hardship, Dahlsens believes in making a meaningful difference. Its support has included donating funds to customers who have experienced theft of their tools and equipment, as well as offering aid during times of illness and personal challenges. Dahlsens takes pride in being more than just a building supplier—it is a trusted partner in its communities, always ready to lend a helping hand when it matters most.

### **CAIRNS HARDWARE** CONSIDER IT DONE

In Far North Queensland, Cairns Hardware is a trusted name, supplying builders and renovators with a wide selection of products tailored to tropical conditions. Cairns Hardware has a reputation for local expertise, reliable service, and community engagement. Cairns Hardware plays a pivotal role in reducing vulnerability and promoting community resilience through its support for Indigenous and local initiatives. These partnerships strengthen community structures and address root causes of exploitation, contributing to a safer and more inclusive society.

#### **Cairns Hardware Community Support**

Key examples of Cairns Hardware's contributions include:

##### **AFL Cape York Partnership**

Cairns Hardware's collaboration with AFL Cape York empowers Aboriginal and Torres Strait Islander youth by providing educational and training opportunities. The program supports young people transitioning from remote communities, equipping them with life skills and fostering self-sufficiency. This structured guidance within a culturally respectful framework reduces vulnerabilities and the risk of exploitation.

##### **NPARC Cultural Festival Sponsorship**

By sponsoring the Northern Peninsula Area Regional Council Cultural Festival, Cairns Hardware celebrates cultural heritage and inclusivity. The festival strengthens community bonds, promotes social cohesion, and instills a sense of pride in Indigenous traditions. This contribution reduces vulnerabilities by fostering a strong, united community.

##### **Conquer the Corrugations Mental Health Initiative**

Cairns Hardware's commitment to mental health awareness through this initiative addresses critical barriers faced in remote communities. By supporting mental health education and resources, particularly in regions with Indigenous populations, the initiative enhances community resilience and diminishes susceptibility to exploitation.

These programs align with our values of responsibility, contribution, and collective growth. They exemplify how we integrate social impact into our business practices to address risks of modern slavery while fostering resilient and self-sufficient communities.

### **NORTRUSS HARDWARE** CONSIDER IT DONE

Nortruss specialises in truss and frame manufacturing in the Northern Territory and North-Western Australia.

### **GIS** NHULUNBUY CONSIDER IT DONE

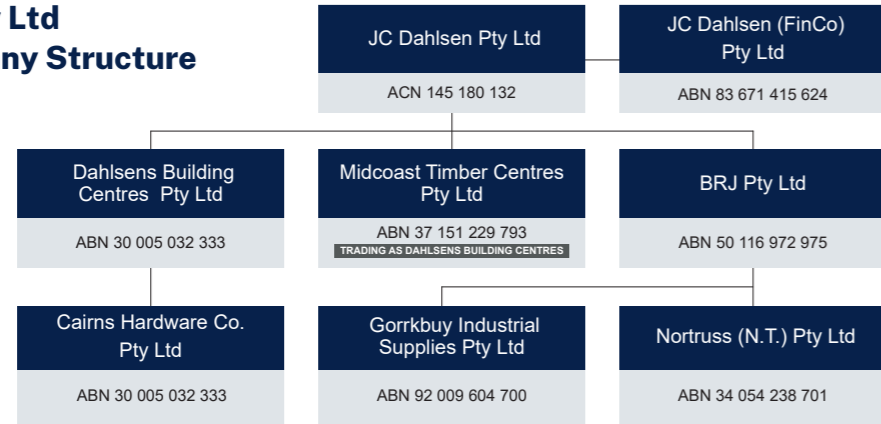
Gorrkbuy Industrial Supplies (GIS) supplies hardware to the community in Nhulunbuy, NT.

**Consultation was carried out via the construction of a Modern Slavery working party including representatives from the following departments with the sponsorship of our CEO**

- Merchandise
- Procurement
- People and Culture
- Marketing
- Finance

In addition, the product sourcing and supply chain strategy is overseen by a national executive team that leads all trading entities within J C Dahlsen Pty Ltd.

**J C Dahlsen Pty Ltd  
Current Company Structure**



The below graphic represents the geographical regions of our operations. For the context of modern slavery, this map, and the supply chain maps that follow, have been overlaid with the colour tier system of the [Trafficking-in Persons Report](#).



**Supply Chain**

Dahlsens' supply chain is designed to provide seamless, reliable delivery of building materials and solutions to residential and commercial builders across metro and regional Australia. It integrates a robust network of suppliers and logistics to ensure materials are available when and where builders need them.

**Supplier Partnerships**

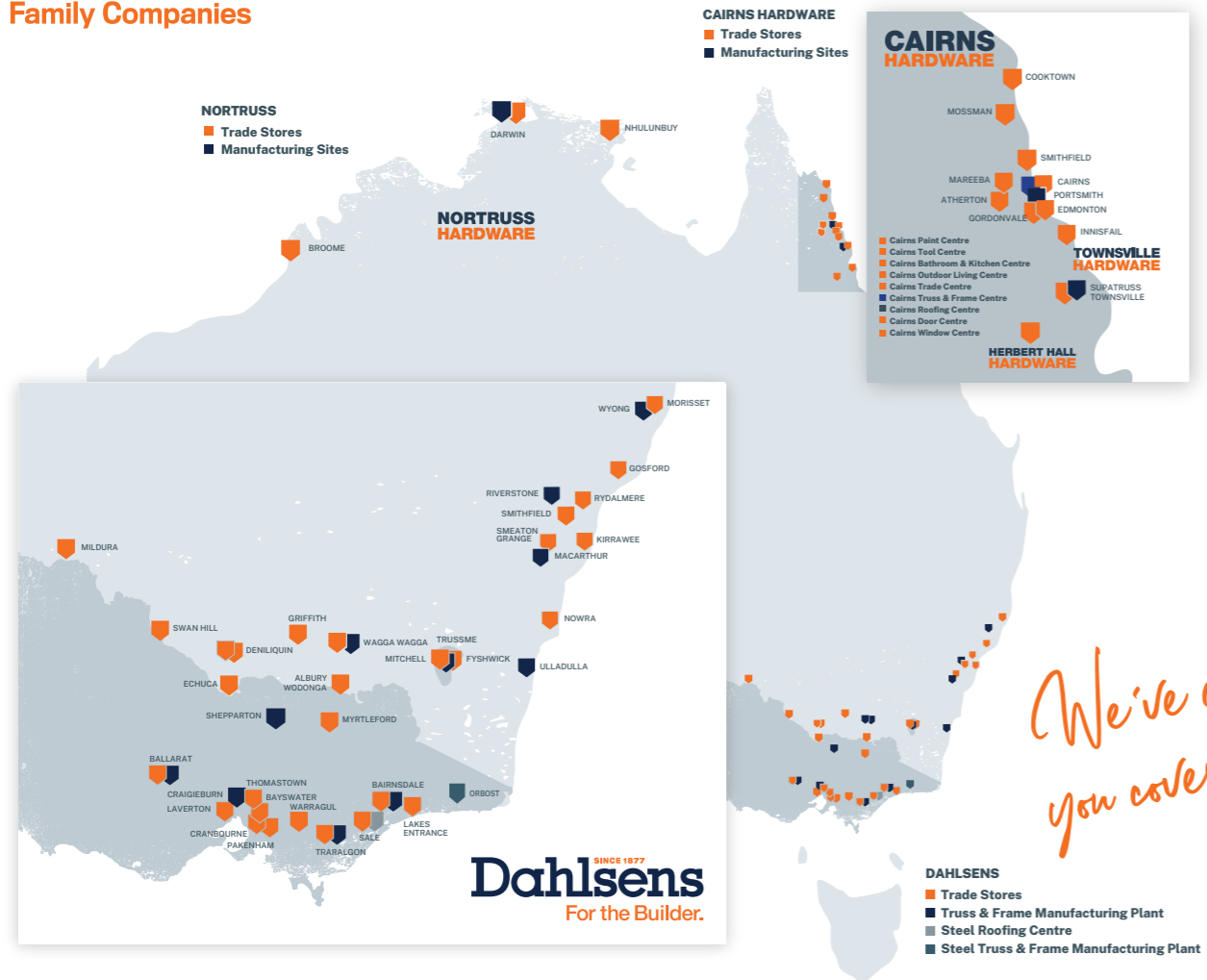
Dahlsens partners with a network of trusted, reputable suppliers to source high-quality building products, from structural timber and truss and frame systems to hardware, windows, doors, and finishing materials. These relationships ensure consistency in quality and enable Dahlsens to offer a wide product range tailored to builders' needs.

**Manufacturing Capabilities**

With in-house truss and frame manufacturing facilities, Dahlsens produces precision-engineered components that support builders with faster, more efficient construction. This capability also allows for customisation to meet project-specific requirements, maintaining high standards of structural integrity and design.

**Warehousing and Distribution**

Dahlsens operates a network of strategically located distribution centres and retail sites, including over 70 locations across Australia. These branches are equipped to stock and manage a vast inventory of materials, ensuring product availability for local and regional customers.



**Our suppliers operate in the following sectors:**

- Accommodation and Food Service Activities
- Administration and Support Services
- Agriculture, Forestry, and Fishing
- Arts, Entertainment and Recreation
- Building services contractor
- Construction
- Domestic work
- Education
- Electricity, Gas, Steam and A/C supply
- Finance and Insurance
- Health and Social Work
- Information and Communication
- Maintenance and Repair of motor vehicles
- Manufacturing
- Mining and Quarrying
- Personal services
- Professional and Scientific Services
- Real estate
- Retail
- Transportation and Storage
- Water supply, Sewerage and Waste Management
- Wholesale

**Our suppliers operate in many locations across the world, including:**

- Argentina
- Australia
- Belgium
- Canada
- China
- Costa Rica
- Czech Republic
- Finland
- France
- Germany
- India
- Indonesia
- Israel
- Japan
- Malaysia
- Mexico
- Netherlands
- New Zealand
- Philippines
- Portugal
- Republic of Korea (South Korea)
- South Africa
- Thailand
- Turkey
- United Kingdom of Great Britain and Northern Ireland
- United States of America
- Vietnam

**Efficient Logistics**

The Dahlsens supply chain is supported by a dedicated delivery fleet and an experienced logistics team that coordinates timely, accurate deliveries. Clear communication and tracking systems help ensure materials arrive on-site in the right condition, reducing downtime and keeping projects on schedule.

**Safety and Compliance**

Safety and compliance are integral to the Dahlsens supply chain. Products are sourced and handled in accordance with Australian standards, and the logistics team prioritises safe delivery practices, including secure loading, unloading, and transport procedures.

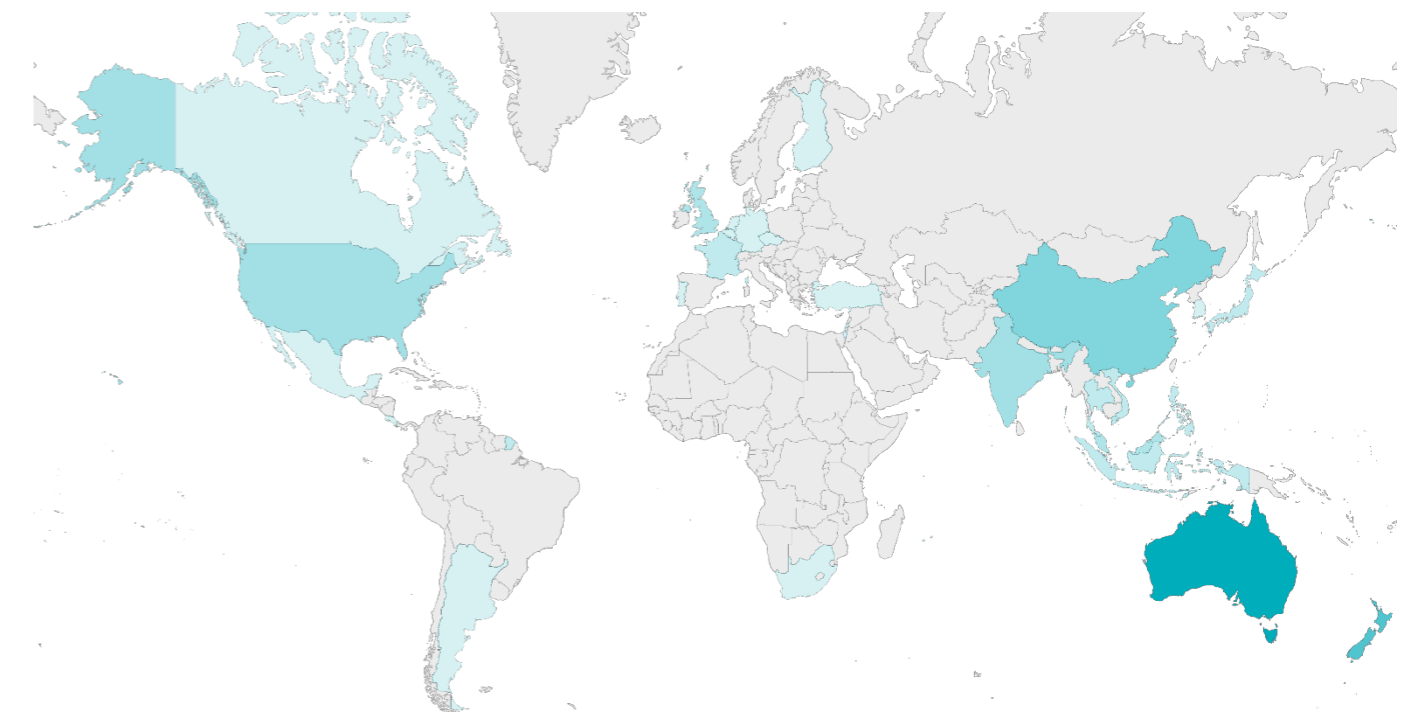
**Technology Integration**

Dahlsens utilises inventory and order management systems to optimise stock levels, streamline ordering processes, and enhance visibility for customers. These systems help ensure builders can access the materials they need, when they need them, with minimal delays.

**Sustainability**

Dahlsens is committed to sustainable practices across its supply chain. From sourcing responsibly harvested timber to minimising waste in its manufacturing and logistics processes, the company prioritises environmental stewardship in its operations.

By integrating strong supplier relationships, in-house manufacturing, logistics, and a commitment to quality and service, Dahlsens' supply chain supports builders with the reliable materials and solutions they need to complete their projects successfully.



# Modern Slavery Risks and Ethical Sourcing

**Modern slavery** refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

The International Labour Organisation estimates that over 50 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

Dahlsens recognises the importance of identifying and addressing modern slavery risks within its operations and supply chain. Modern slavery encompasses

practices such as forced labour, child labour, human trafficking, and other forms of exploitation. As part of its commitment to ethical business practices, Dahlsens assesses potential risks across its activities and supply relationships.

Our suppliers operate, produce, and source across several/ different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

The below graphics show the high-risk sectors of operation, production, and sourcing for our suppliers. The numbers in the following graphics describe how many suppliers are in the corresponding sectors.

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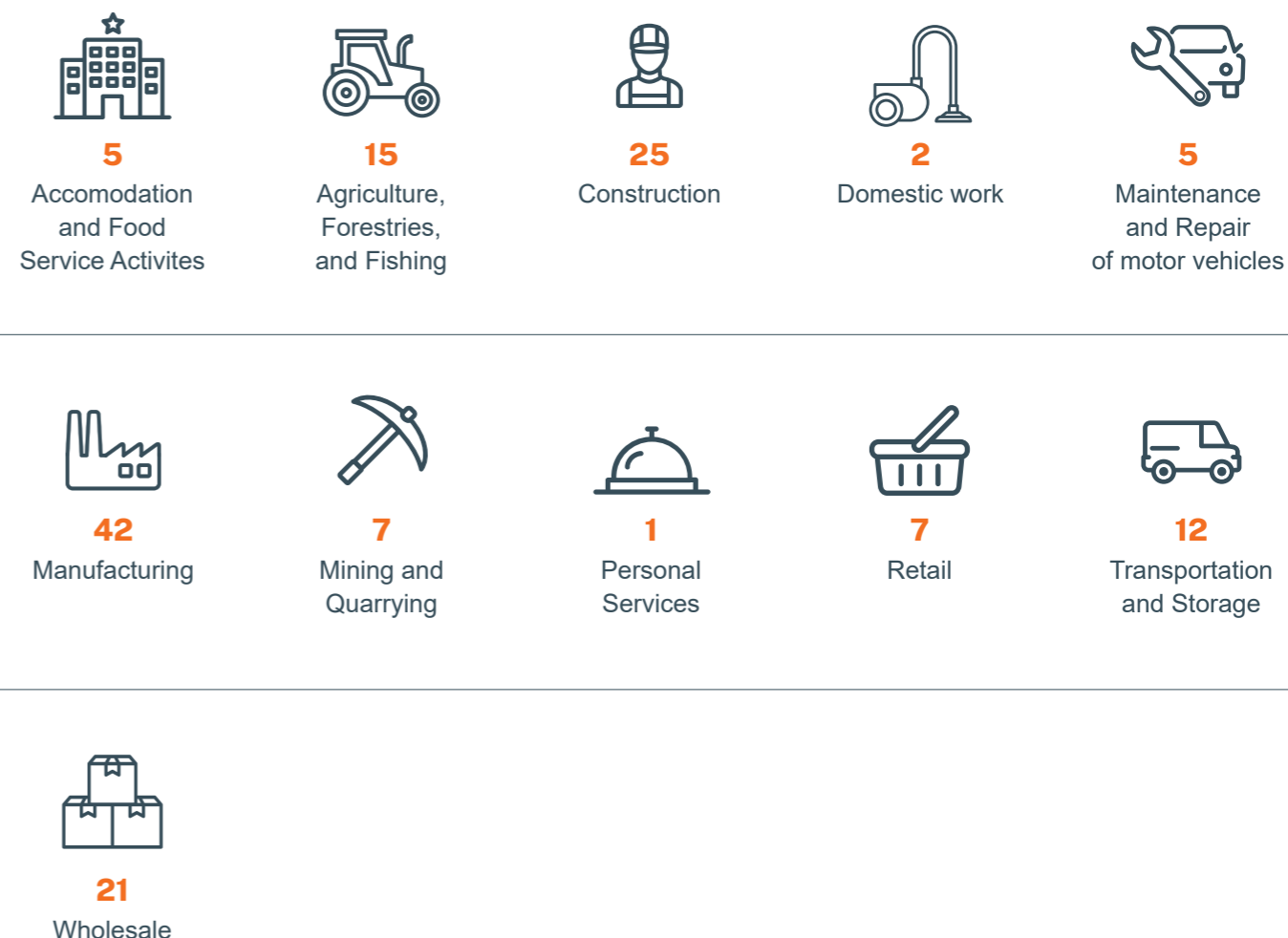
## High-risk Sectors of Operation



## Production of goods in High-risk Sectors



## Sourcing goods in High-risk Sectors





Some countries or regions where our suppliers operate, as well as some goods produced and sourced by our suppliers, can be described as high-risk due to the possibility of a link to modern slavery practices such as Forced Labour, Human Trafficking, Child Labour, and Debt Bondage.

The geographical regions where our supply chain partners operate are shown in the map below. This map, and the supply chain maps that follow, have been overlaid with the colour tier system of the [Trafficking-in Persons Report](#).

There is modern slavery risk associated with sourcing the following goods from the countries listed below:

**Brazil**

- Timber

**China**

- Aluminium
- Electronics
- Gloves
- Nails

**Malaysia**

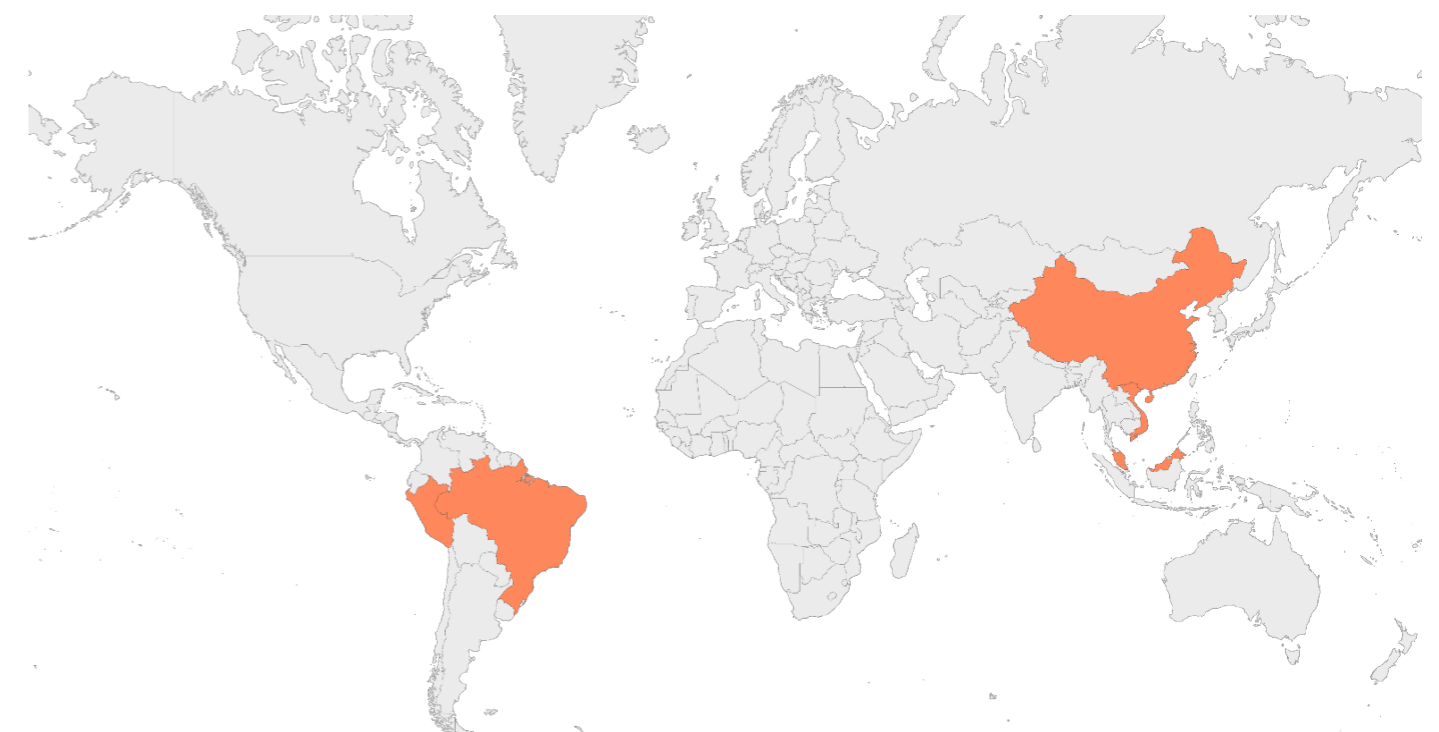
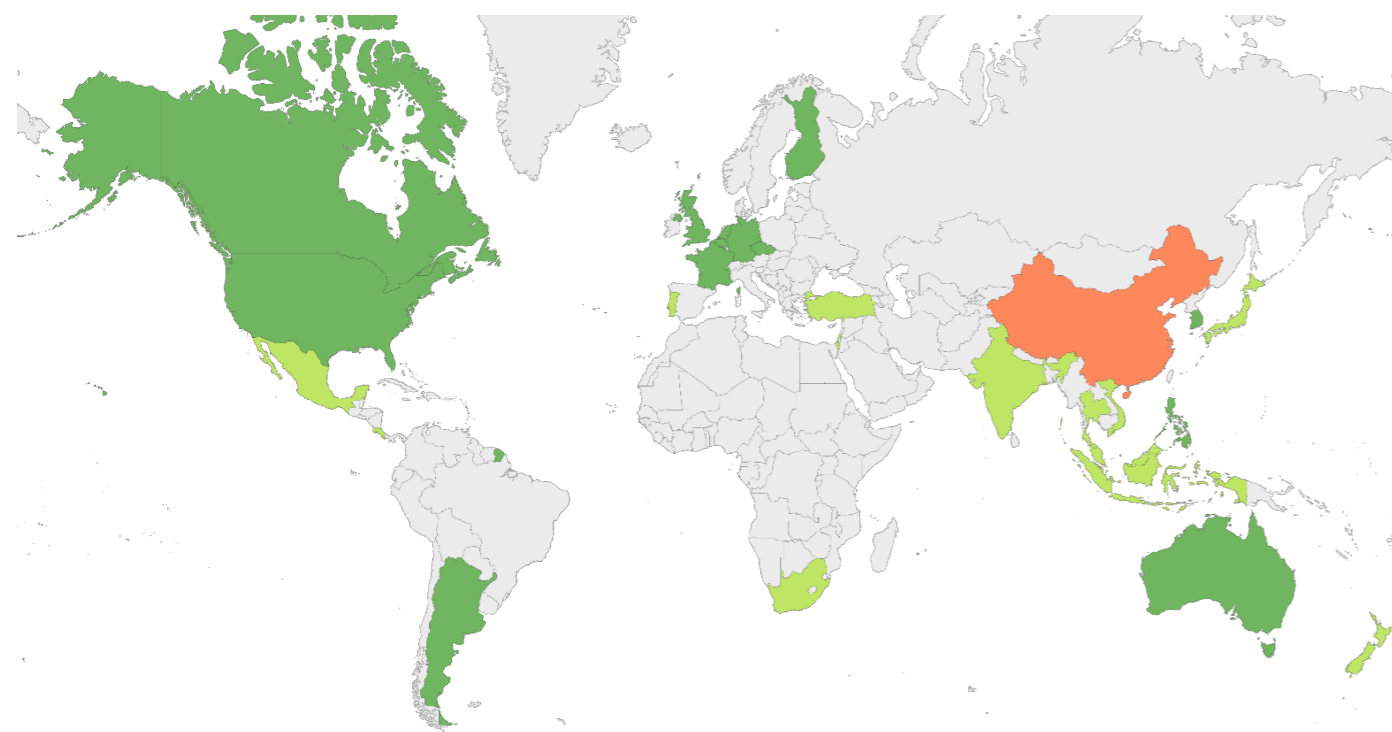
- Electronics

**Peru**

- Timber

**Vietnam**

- Timber





Dahlsens (J C Dahlsen Pty Ltd) uses a third-party tool, to assess modern slavery risks in our operations and supply chain. The risks identified in the previous section were all identified utilising this assessment tool. We engaged iPRO during the reporting period to conduct the assessments on our operations, and a bulk assessment of 109 of our suppliers representing 71% of our supplier spend. We intend to carry this process forward as an annual assessment of our operations and supply chain using the iPRO Modern Slavery Assessment Tool to assess modern slavery risks in our operations and supply chain. The risks identified in the previous section were all identified utilising this assessment tool. We engaged iPRO during the reporting period to conduct the assessments on our operations, and a bulk assessment of 109 of our suppliers. We intend to carry this process forward as an annual assessment of our operations and supply chain.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

### Address

Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment.

Action items were also aggregated, giving Dahlsens (J C Dahlsen Pty Ltd) a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

We have started rolling out a supplier follow-up initiative to further discuss the action items and address the risks identified through the assessment. Primarily this involves ensuring that suppliers have the right policies and procedures in place to mitigate inherent risks in their business.

- We are embarking on a rhythm of biannual supplier follow ups to continuously improve in the identified areas of risk and update the survey results accordingly.

Other ways we are addressing modern slavery risks include:

- **Ongoing Risk Assessment:** We continuously assess modern slavery risks within our operations and supply chain to identify potential vulnerabilities and implement appropriate mitigation strategies.
- **Review and Enhancement of Key Procedures:**
  - *Supplier Onboarding:* We have strengthened our supplier onboarding process to include thorough due diligence checks, ensuring suppliers align with our ethical standards and modern slavery commitments.
  - *Recruitment Practices:* We regularly review and update our recruitment procedures to prevent exploitative labour practices and ensure fair working conditions for all employees.
- **Modern Slavery Policy and Training:** We have implemented a Modern Slavery Policy that outlines our commitment to ethical business practices. Additionally, we provide regular training to our team members to enhance their awareness of modern slavery risks and their role in identifying and addressing them.
- As we move into the next phase of our modern slavery journey we aim to increase suppliers surveyed from 71% to 90% of our national purchases.



**We utilise the benchmarking and KPI's in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions.**

The main KPI's we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.

Each organisation who completed the assessment questionnaire was assessed and given 2 risk scores.

- Inherent Risk Score
- Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

As this is the first year we have used the platform to conduct our assessments and due diligence, we will be able to objectively measure the effect when the assessments are completed during the next reporting period.

Dahlsens (J C Dahlsen Pty Ltd) is provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

We aim to continuously improve on these KPI's.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing relevant policies and procedures.

We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment programme to better identify and mitigate modern slavery risks in our supply chain.

**Reporting Period Year KPI's**

**Operations Risk Scores**

Inherent Risk Score	50.00 / 100
Unmitigated Risk Score	14.23 / 100

**Aggregated Supply Chain Risk Scores**

Inherent Risk Score	45.98 / 100
Unmitigated Risk Score	30.31 / 100

**Supplier Assessment Completions**

Completions	87 / 109
Completion Rate	79.8%







**Dahlsens** SINCE 1877  
Family Companies