



# Ames Australasia Modern Slavery & Ethical Sourcing Statement

# Abbreviations

BSCI-	Business Supply Chain Initiative
AHRC-	Australian Human Rights Commission
WGEA-	Work Gender Equalisation Agency
APCO –	Australian Packaging Covenant Organisation Australian
ARL –	Recycling Label
BEIS –	Biological Exposure Indices
BOM –	Bill of Materials
COC –	Chain of Custody
EPA –	Environmental Protection Agency
ESG –	Environmental, Social & Governance Freight
FIS –	In Store
FOB –	Freight On Board
FSC –	Forestry Standard Certification Global
GRS –	Recycling Standard
ISO –	International Organisation for Standardization
MS -	Modern Slavery Act 2018
PIM tool –	Product Inventory Management
PM –	Product Manager
SEDEX –	Supplier Ethical Data Exchange
SEPP –	State Environmental Planning Policies SEDEX
SMETA –	Members Ethical Trade Audit Sustainable
SPG –	Packaging Guidelines
UNGC –	United Nations Global Compact

## Disclosing Statement

*'AMES' refers to AMES Australasia, a subsidiary of Griffon Corporation. This report does not speak to any of the Modern Slavery or ethical sourcing reporting that is conducted in the other AMES groups and only to the broad agenda of AMES Australasia's parent organisation, Griffon.*



# Structure - November 2025



**Griffon Australia  
Holdings Pty Ltd**  
ABN 35 156 377 356

**Directors:**

- Bob Mehmel
- Brian Harris
- Simon Hupfeld
- Dale McGrath
- Francois Cleret



**AMES Australasia  
Pty Ltd**  
ABN 89 169 427 061

**Directors:**

- Bob Mehmel
- Brian Harris
- Simon Hupfeld
- Dale McGrath
- Francois Cleret



**AMES New Zealand**  
Company 3882776 - NZBN  
9429030631151

**Directors:**

- Bob Mehmel
- Brian Harris
- Francois Cleret
- Rachel Hickmer



**Quatro Design**  
ABN 76 108 351 355

**Directors:**

- Bob Mehmel
- Brian Harris
- Simon Hupfeld
- Dale McGrath
- Francois Cleret



**Plantfulness Ltd**  
ABN 37 651 282 441 –  
Charity Limited by  
Guarantee

**Directors:**

- Simon Hupfeld
- Dale McGrath
- Francois Cleret
- Michael Wood



# Welcome

*Joint message from Managing Director, Head of Supply Chain and Head of People and Culture*

“Respecting and supporting human rights, anti-corruption efforts, and environmental sustainability strengthens our business relationships—with suppliers, employees, and customers alike. Operating as a responsible global citizen should be second nature for any business. When dignity and respect are at the core of our actions, we foster growth that goes beyond profits and reinvestment. We build a reputation that makes us the first choice—not just for consumers and valued partners, but also for talented individuals who want to be part of something meaningful.

Our statement lays out our view of partnering with customers, suppliers, shareholders and employees to achieve our goal of zero slavery and high ethical standards. We feel strongly that the foundation to our success will be through achieving business goals with a commitment to respecting the global community, its environment and maintaining a well structure governance.”



**Francois Cleret**  
Managing Director Ames Australasia



**John Hynes**  
Head of Supply Chain



**Michael Wood**  
Head of People & Culture

# Scope of Commitment

Griffon Australia Holdings, including Ames Australasia—an Australian Border Force (ABF) Trusted Trader—actively monitors and manages risk within its supply chain to facilitate legitimate and ethical trade.

We are committed to being a company that expects everyone working with us or on our behalf to uphold the following principles to safeguard against modern slavery and promote environmental sustainability:

## Zero Tolerance for Modern Slavery

There is no place for any form of modern slavery within our organisation or supply chains. Preventing, detecting, and reporting such practices is a shared responsibility of all employees, contractors, and suppliers. No one must engage in, facilitate, or ignore any activity that could lead to or indicate a breach of this policy.

## Stakeholder Engagement

We are committed to working collaboratively with our stakeholders and suppliers to identify and address risks related to modern slavery and environmental hazards across our operations and supply chain.

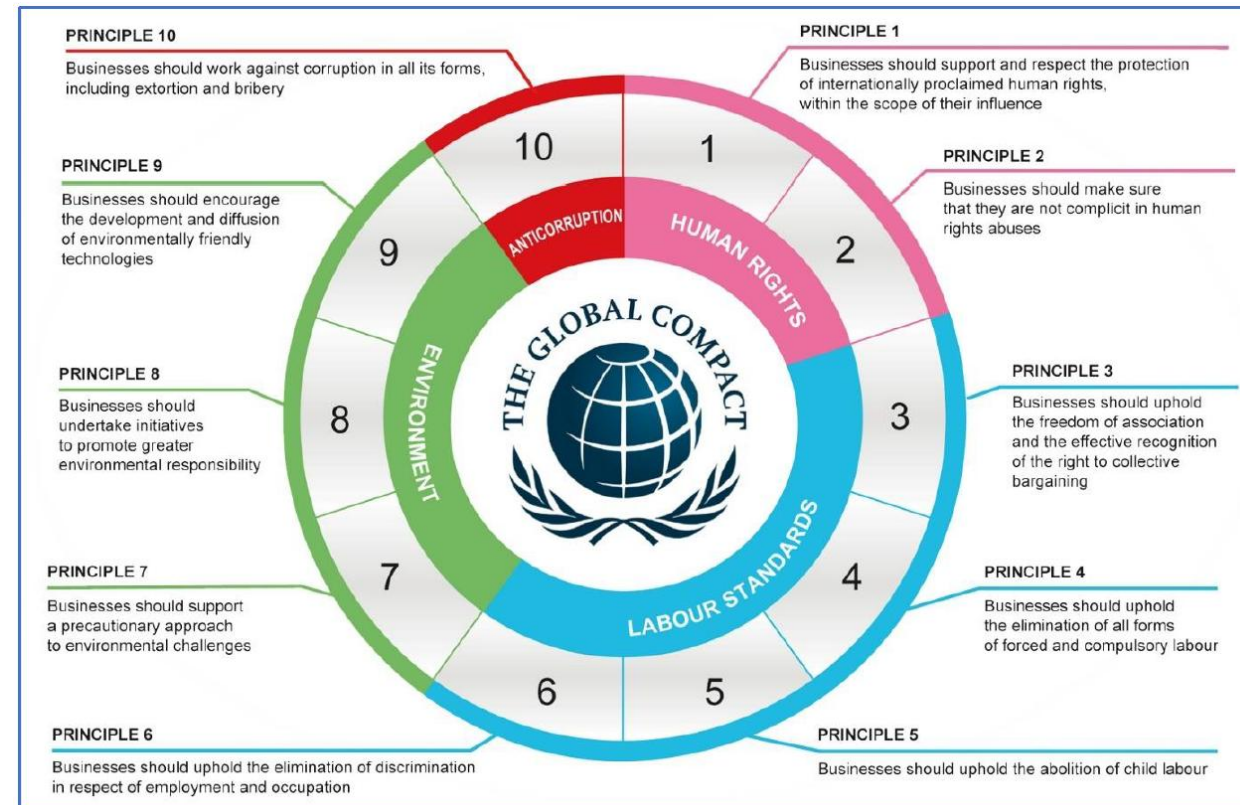
## Risk-Based Approach

Our contracting processes are guided by a risk-based approach and are subject to ongoing review. We assess the inclusion of risk management procedures when initiating and maintaining supplier relationships.

## Supplier Standards and Accountability

Where appropriate, we will require suppliers to comply with the Ames Code of Conduct, which outlines minimum standards for ethical and sustainable supply chain practices. Compliance will be monitored through evidence-based audits and disclosures.

## Ames Australasia is a signatory of United Nations Global compact



# Our Company Structure

Ames Australasia is a home and garden wholesaler with nine DC sites nationally across Australia.

We are the largest wholesale provider of non-powered garden tools and offer over 9000 product skews; the business is made up of multiple acquisitions since 2010 and our team is made up of over 550 employees. Our products are offered to the home consumer and trade professionals through retail outlets in Bunnings, IHG, Aldi and garden centres.

## Our Brands

Our brands are some of the most iconic Australian Brands such as Cyclone, Hills, Nylex, Pope and Northcote Pottery, Tuscan Path to name a few.



**550**  
Employees



**9 Sites**  
1 Head Office, 5 DCs and 3  
Manufacturing sites



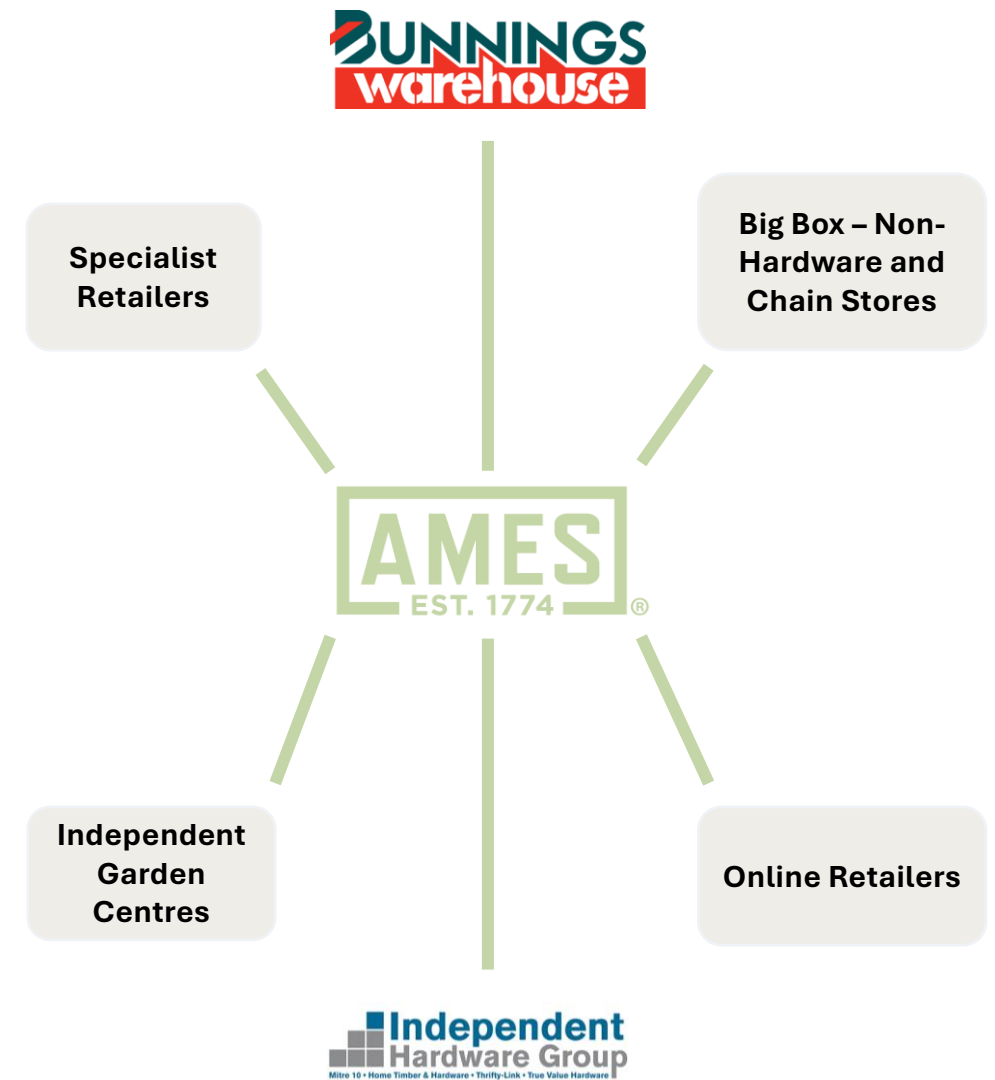
**9000**  
Product SKUs



**\$550M+**  
Sales



**390+**  
Retail Customers



# Our Key Pillars



## Strengthening Partnerships

In simple terms Ames Australasia will foster transparent and collaborative relationships across the supply chain to build trust and mutual understanding. Our aim is to supply information which leads our businesses to manage risk with labor, corruption, ethical sourcing and modern slavery. The business will consistently develop good mutual compliance in meeting these goals.



## Building Trust

At Ames Australasia, we are committed to living our value of being “Open, honest, always.” This principle is central to how we manage risk transparency as a Sedex supplier partner. By actively supporting our customers and suppliers through evolving regulatory requirements, we reinforce trust and strengthen relationships across the supply chain. Our collaborative approach ensures compliance while delivering added value to all stakeholders.



## Continuous Improvement

Our entire process will be to enhance Supplier Risk Management, increase the frequency of live audits for suppliers identified as high-risk to ensure compliance and mitigate potential vulnerabilities. This will Strengthen Governance Across the Value Chain and Broaden the audit scope to encompass both internal operations and external partners, driving greater transparency and accountability throughout the supply chain.

# Governance

We are continuing to identify governance for ethical sourcing in our regulatory procedures for local, national and global business.

## Company Level

Our Head Office teams, based in Doncaster, Victoria, drive the development and sourcing of our market-leading own exclusive brand (OEB) products and manage global relationships with our brand suppliers. Within Head Office, a dedicated resource implements our ethical sourcing approach with our suppliers and their factories in our sourcing countries.

Our Supply Chain, Global sourcing, Human resource and Sustainability departments working together on managing human risk, supplier risk and sustainability.

## Customer Level

Our customers support the development of our category strategies and product ranges tailored to their markets and non-OEB products. Key Customers have internal sustainability teams support Ames to apply our ethical sourcing policies and implement ethical compliance across factories and suppliers, aligning with our ethical sourcing requirements for OEB and non-OEB products.

## Building Internal Committees



### Ames Global Ethical Sourcing Committee

The Ames Ethical Sourcing committee in leads and oversee the responsible business strategy including Human rights, supply chain risk in setting a clear strategy, with the view to meeting four times a year.



### UNGC & Human Resource Committee

The UNGC & Human Resource Group will focus on Human Rights and Modern Slavery connecting the business with Government, Suppliers and ourselves. They will work alongside the Ethics Committee to drive the operational strategy. View to meeting bi-monthly.



# Material Risks

**We have a large global supply chain, so we take a risk-based approach, prioritising the most significant human rights impacts and modern slavery risks.**

Through our due diligence processes and ongoing approach, we continue to understand and address human rights risks within our business and supply chains. This includes collaboration with suppliers, customers, industry bodies, and government to address human rights issues and raise standards.

## Our Human Rights Issues

We have identified 10 human rights issues across our business and supply chains, as defined by the UN Guiding Principles Reporting Framework.

These are:



Modern Slavery



Child/underage labour



Freedom of association/  
collective bargaining



Health and Safety



Wages/  
Working hours



Land Rights



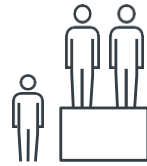
Depletion of natural  
resources



Impact of  
climate change



Air, water and  
land pollution



Discrimination

## Risk Assessment for GFR

We use various risk assessment tools to mitigate risks within our product supply chains, targeting suppliers in the highest-risk countries, sectors, and locations.

These tools include:

**Ethical Risk Matrix** - Utilises data to identify high-risk product areas and countries in our GFR supply chain. This matrix is updated annually.

**Compliance Platforms** - Platforms like Sedex, and BSCI enable us to access data on inherent risks related to countries and industry sectors. The Sedex Self-Assessment Questionnaire (SAQ) helps us assess risks based on supplier and factory responses.

**Ethical Audit Reports** - Provide information about factory operations, including any issues found.

# Operational Risk and Due Diligence

## Within our Global Network

Our Supply Chain team conduct an annual risk assessment to evaluate our performance against our minimum standards for modern slavery and identify areas for improvement. Our supplier risk assessment and due diligence procedures outline our social and environmental requirements, with specific guidance on modern slavery.

We do not engage with any third party suspected of modern slavery or human trafficking. All suppliers are profiled to identify potential risks, including:

- **Country Risk:** Assessing the country where the supplier operates or trades to identify those in higher-risk countries for corruption. This is evaluated using the World Governance Indicators, the Transparency International Corruption Perceptions Index, and the Global Slavery Index.
- **Product Risk:** Identifying suppliers producing goods with a higher known risk of slavery, using sources such as the "US Department of Labor List of Goods Produced by Child Labor or Forced Labor" and other high-risk product categories known for using seasonal manual labor.
- **Service Risk:** Identifying suppliers in services more exposed to slavery risks. This includes, but is not limited to, freighting companies (exposed to trafficking risks), cleaning companies, waste management companies, and facilities management or property management contractors.

## Within our Supply Chains

Our responsible sourcing and quality team manage modern slavery due diligence within our supply chain. We are members of SEDEX, using SMETA and other third-party audit bodies.

Ames Australasia's supply chain commitments are detailed in our supplier procedure manual, which all suppliers must follow. GFR and GNFR suppliers must complete a risk assessment every two years to identify key risks.

We have simple practices in place with our suppliers to identify potential modern slavery concerns. Factories and manufacturers of Ames Australasia-branded products undergo a SMETA ethical audit every two years.

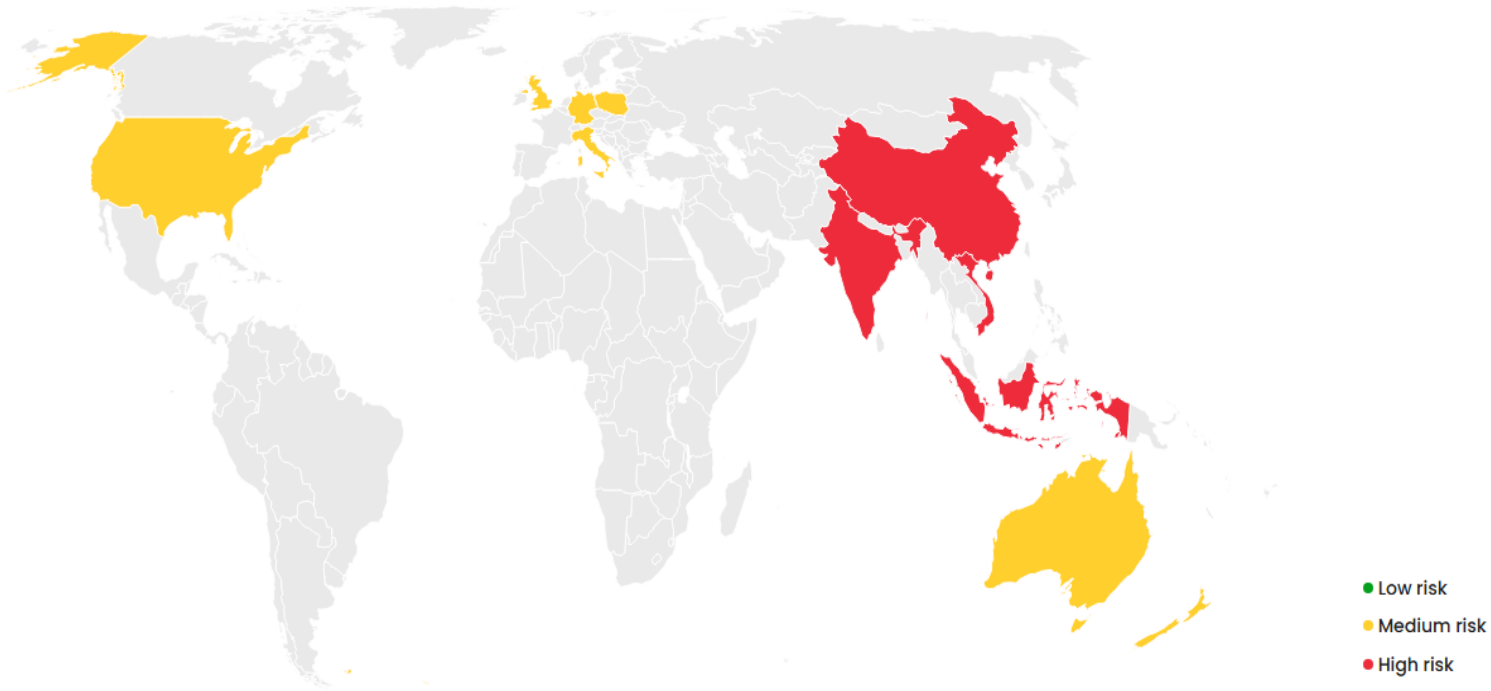
In-person factory assessments were resumed Mid 2022. We are looking to adopt more digital assessments. A schedule based on risk is set for in-person audits in 2024.

In 2025, 95% of our timber purchases for our Cyclone products were certified as responsibly sourced by FSC and PEFC.

## Within Our Own Business

Ames Australasia has clear controls which reduce the risk that could inadvertently employ underage individuals. All Direct recruitment adheres to legislative requirements and are also subject to Right to Work checks. An Internal Audit is conducted periodically to review processes and controls to ensure compliance with local employment laws, including Right to work and Background checks.

Agency worker recruitment is clear with outlined procedures and with due diligence performed by the agency. All agencies used by the Ames Australasia's distribution and manufacturing sites, (which employ a high level of manual labour), undergo background checks. A contract detailing our expectations for their own due diligence to prevent modern slavery is in place. They are expected to comply with our Code of Conduct, anti-corruption and



## Country Legend

- |             |             |               |                            |
|-------------|-------------|---------------|----------------------------|
| ● Australia | ● Germany   | ● India       | ● United States of America |
| ● China     | ● Austria   | ● New Zealand | ● United Kingdom           |
| ● Vietnam   | ● Indonesia | ● Poland      | ● Italy                    |

# Our Operating Model with Global Supply Risk

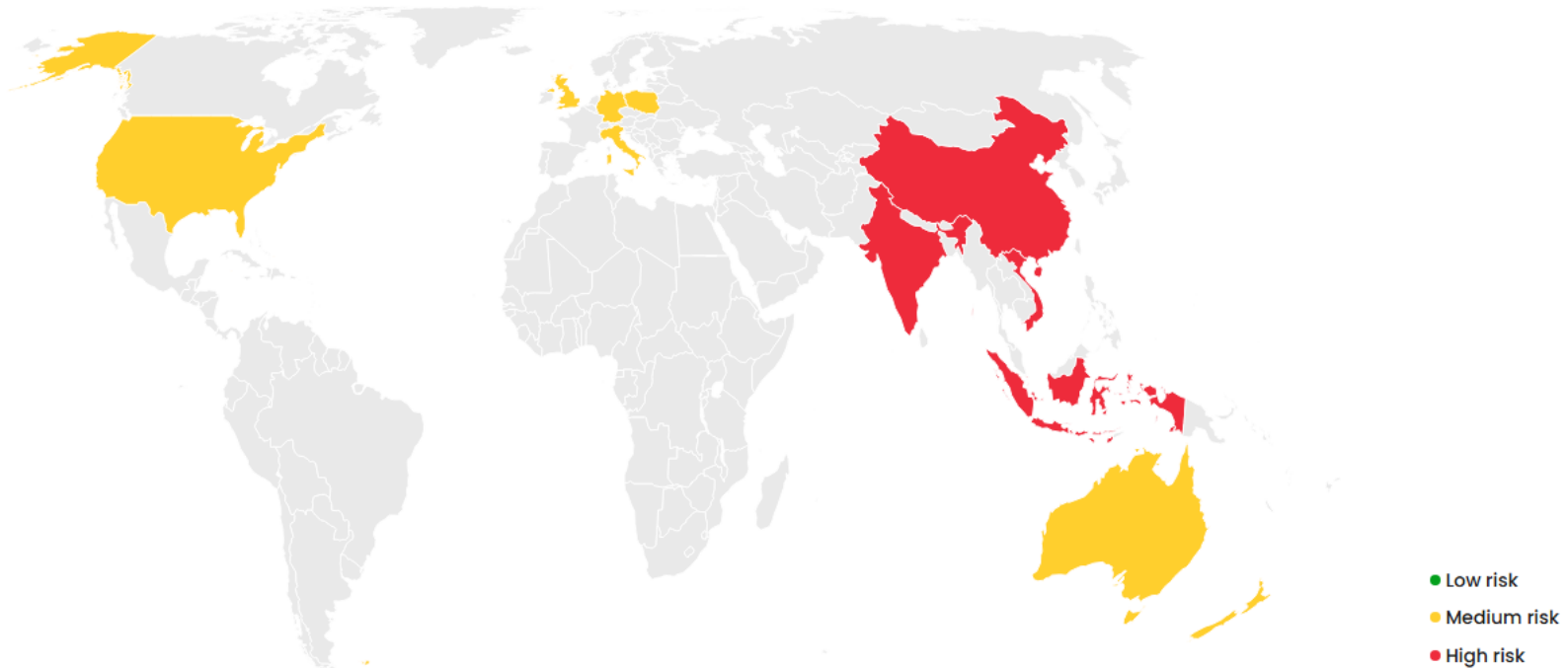
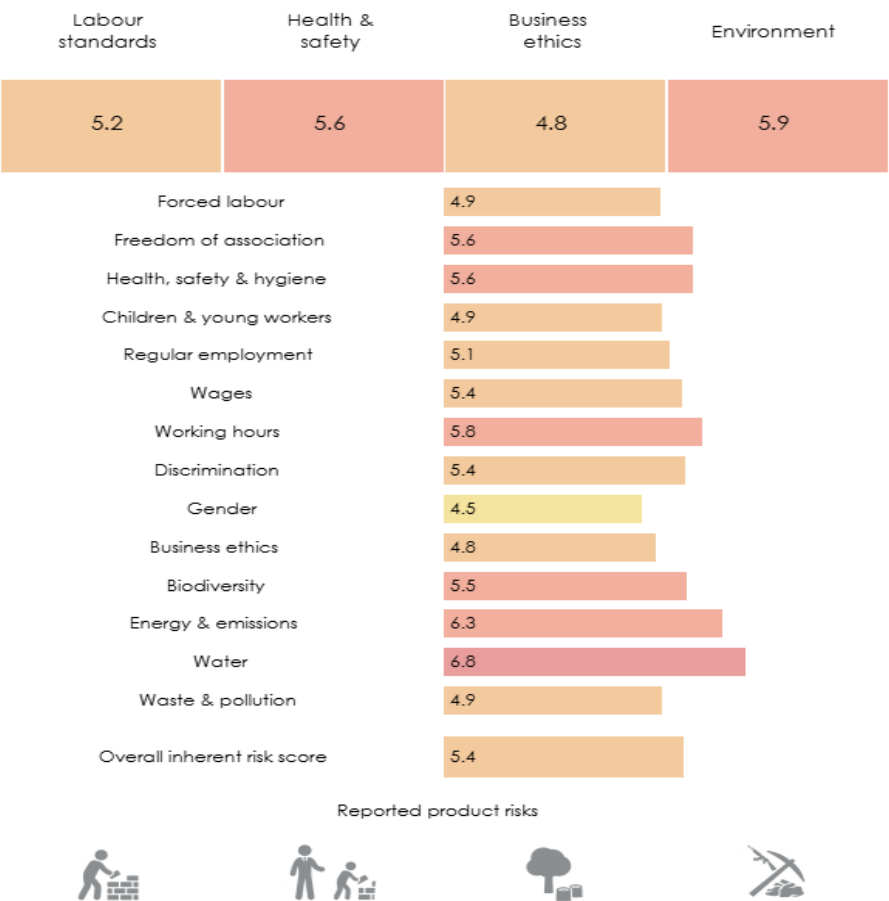
Ames Australasia operates a central supply chain team in Victoria, Australia that is responsible for high value or complex procurement of our goods and services on behalf of our business. The team administers several of the key policies which include modern slavery and ethical sourcing risks.

The nature of the contracts are variable with suppliers which are rolling 1–2-year contract terms.

## Overview of Supply Chain

Total Overseas Suppliers: 131

How SEDEX reference Inherent Risk



There is always an element of risk. Inherent risk is the level of risk that exists before any actions are taken to change the likelihood or impact of that risk. It's the risk an organization takes on before any controls are implemented



Supplier Transparency

Total O/S Suppliers	Current Live Audits	% FY25
131	101	95%

Inherent Risk Overview

Suppliers	Current Live Audits	Spend % FY25
110	97	94%

SEDEX Onboarding

Members	Current Live Audits	Spend % FY25
95	88	88%

Griffon Code of Conduct and Modern Slavery Statement

Signed	Signed % FY25	Modern Slavery
131	100%	100%

Material Risks

Country	Suppliers
China	97
Vietnam	10
Taiwan	6
India	5
Italy	2
Thailand	1
Germany	3
Poland	1
Japan	1
Malaysia	2
Latvia	1
Portugal	1
Sweden	1

Total O/S Suppliers  
131

# Policy Framework

Our policy framework sets clear standards for human rights and modern slavery for our business, suppliers, and partners. We review and update our policies annually. Approved by our Executive Team, these policies apply to all suppliers, both Goods for Resale (GFR) and Goods Not for Resale (GNFR). Our key policies include:

## Code of Conduct

- Defines responsibilities for ethical standards and reporting breaches.
- Includes commitments to human rights and ethical sourcing.
- Applies to all Ames Australasia employees, contractors, and suppliers.

## Whistleblower Policy

- Provides a secure, confidential process for reporting concerns, including human rights and modern slavery issues, without fear of retaliation

## Modern Slavery Policy

- Our policy on modern slavery, respecting international human rights agreements.
- Commits to due diligence to prevent rights violations.
- Details our ethical sourcing processes.

## Supply Chain Policies & Procedures

- Ames Supplier Trading Terms (ASTTA) & Ames Ethical Sourcing Policy (AESP) Sets minimum labour and environmental standards for suppliers, checked through audits.
- Prohibits slavery and child labour, and sets standards for health, safety, wages, and working hours.
- Aligns with Ethical Trading Initiative (ETI) and International Labour Organisation (ILO) standards.



# Whistleblowing and Escalations

**We have a confidential reporting system that allows team members and suppliers to securely report any ethical concerns, including modern slavery and other human rights violations, without fear.**

Our approach includes:

## **Ames Ethics Compliance Hotline**

Our independent and confidential whistleblowing hotline is available to all employees, contractors and suppliers.

## **Training**

Our Code of Conduct compliance annual training provides guidance on identifying and reporting various issues.

## **Investigation**

Any reports from the compliance hotline are reviewed and investigated as needed. Non-sensitive cases are handled by the respective banner, with the outcomes reported to the local Ethics Manager, Our Head of People and Culture. Sensitive cases are investigated at both Local and Griffon Group levels and reviewed by the Group Ethics and Compliance Committee.

## **Identifiable Incidents**

There were no substantiated reports relating to modern slavery made via our whistleblowing hotline in 2025.

We require suppliers to maintain a mean by which workers can openly communicate and we require them to share their grievances with management, without fear intimidation or harassment. This requirements is included in our Code of Conduct and Supply Chain Practices and our ethical audits that suppliers have grievance processes in place.

## **Modern Slavery Escalation Procedures**

We are currently establishing a procedure for handling any incidents of modern slavery, to ensure we respond quickly, effectively and consistently. This involves escalating issues to director level, gathering information and investigating non-compliances, as well as a process for deciding further action or escalation.

The procedure means we can co-ordinate a quick response to any concerns raised. Once understood it will be communicated to the relevant team members across our business.

# Employee Training and Awareness Building

Regular training and awareness are essential to build knowledge to ensure that risks of modern slavery and how they can report concerns

To ensure a high level of understanding of the risks of Modern Slavery and Human Trafficking in our supply chains we continuously provide training to our teams.

Feedback is collected after all training sessions and use this to update and improve our training. We also use verbal insights from our training to make sure our training is as relevant as possible for our team members.

## Modern Slavery e-learning Module

We utilised a modern slavery e-learning module for our team members in 2022. The module provides an overview of the different forms of modern slavery, the risk areas in our supply chain, our approach to spot indicators of modern slavery, how to raise concerns and what to do if a case is found. The training was rolled out across all Head Office employees and made mandatory for our Product, Supply Chain and Logistics team members. We are creating a simpler course for our frontline workers to support their knowledge and understanding of modern slavery. Going forward we will continue to roll this training out on a bi-annual look to prioritise keeping team members informed who work with our suppliers partners abreast of any changes to the Modern Slavery Act and training to accommodate the learning.

## Updated Code of Conduct

In 2024 we updated the code of conduct into an e-learning training, this training is mandatory for all team members. As part of the update, we also changed our supplier code of conduct training, to provide all suppliers with an introduction to the indicators of modern slavery and human rights approach as a business.

This training will be rolled out in 2024.



# Training Activity in 2026

Our training program reached over 550 team members in a variety of roles during 2024 & 2025.

Training title/Topic	Description of content	Who is the training for?	Training Delivery
<b>Modern slavery e-learning module</b>	An online digital training module, which provides an overview of modern slavery risks and educates our teams on how to spot the signs and what action to take if a case is found.	All Head Office Employees	University of Technology Sydney (UTS)
<b>Sustainability Training</b>	We trained 42 team members in our head office and operational sites. The sessions provided an introduction to our ethical sourcing approach and why it is important, how we track progress, latest performance and how team members should contribute to implementing our policies. Team members complete a quiz at the end of the session to check they have understood the training.	Selected Head Office/Operations Employees	Sustainability Manager/Head of People and Culture
<b>Product and Supply Chain Teams training</b>	Training on our ethical sourcing requirements and process for addressing business critical issues.	Product, Supply Chain, Sustainability	Global Sourcing Manager/Head of People and Culture
<b>Modern Slavery Statement</b>	A review of the Modern Slavery Statement and transparency in reporting.	All Head Office Employees	Head of People and Culture
<b>Employee Code of Conduct Training</b>	An online training document, which provides the details on how to report and escalate Modern Slavery and Human Rights Concerns.	All Employees and Contractors	Head of People and Culture
<b>Supplier Code of Conduct Training</b>	An online training document, which provides the details on how to report and escalate Modern Slavery and Human Rights Concerns.	All Suppliers	Head of People and Culture
<b>UNGCA</b>	As a member of United Nations Global Compact Australia	HR compliance and ethical sourcing team	Head of People and Culture

# Addressing the effectiveness of our actions

Based on the criteria, Ames Australasia’s update on Modern Slavery performance against some internal Key Performance Indicators for high and medium risk:

## FY25 Commitment

To understand more about how we implement a clear Modern Slavery Strategy  
To ensure Supplier assessments are 100% completed  
To provide Suppliers with the capability to report to the Ethics Hotline

Topic	Description	FY24	FY25
Training	The percentage of training that Ames employees have received relating to Modern Slavery and Human Trafficking training	40%	96%
Supplier Engagement	• Supplier Assessment Questionnaires	65%	95%
	• Number of Supplier Assessments completed	71%	95%
	• Percentage of Supplier Assessments Flagged	3%	1%
	• The number of Modern Slavery Issues Identified	0%	0%
Grievances	The number of Whistleblower complaints relating to Modern Slavery	1	0
Remediation	The number of remediation actions taken with suppliers	3	2

# How we are Improving our Supply Chain Standards

**While Ethical audits are crucial for enhancing supply chain standards, yet they alone may not fully resolve the underlying causes of policy non-compliance. Therefore, we are working on initiatives designed to build broader positive changes within our supply chains.**

These initiatives target key human rights issues, work to mitigate modern slavery risks, enhance supplier capabilities, and facilitate direct engagement with workers across our supply base.

## Improving standards among suppliers

- We collaborate with a wide range of manufacturing suppliers to ensure all indirect suppliers adhere to our sourcing standards. We aim to raise awareness among our suppliers regarding their roles and responsibilities for maintaining ethical compliance throughout the extended supply chain.
- We require our suppliers in China to inform us about any indirect suppliers they engage with. They must detail their processes for selecting, managing, auditing, and reviewing these suppliers.
- When we identify gaps in responsible sourcing, such as inadequate record-keeping or failure to follow our policies, we work closely with the suppliers to develop and implement an action plan to meet our standards.

## Understanding the risk of ceramic raw materials

- In 2025, we initiated a project with ceramics suppliers in China to identify human rights risks in their raw materials supply chain. We conducted visits to multiple ceramics suppliers to assess their current risk management practices.
- We are developing a questionnaire to map their raw material providers and identify risk areas. This initiative will be launched in 2025, and we will use the findings to collaborate with suppliers on implementing necessary improvements. We plan to expand this program to ceramics suppliers in other countries, including Vietnam and rest of Europe.