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#### **ASX Announcement**

16 December 2022

#### 2022 Modern Slavery Statement

Reliance Worldwide Corporation Limited (ASX: RWC) has released its 2022 Modern Slavery Statement. A copy is attached.

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This announcement has been authorised for release by the Company Secretary.



# FVC

# **Reliance Worldwide** Corporation Limited Modern Slavery Statement December 2022



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### About this statement

This Statement, prepared in accordance with s16(1) of the Australian Modern Slavery Act 2018, sets out the actions taken by Reliance Worldwide Corporation Limited ("the Company") and its subsidiaries (together "RWC" or "the Group") to identify, assess and address modern slavery risks in our operations and supply chains during the financial year ended 30 June 2022 ("FY2022").

The Group entities required to report under the Act are:

Reliance Worldwide Corporation Limited (ABN 46 610 855 877); and

Reliance Worldwide Corporation (Aust.) Pty Ltd (ABN 71 004 784 301).

This Statement applies to all entities in the Group. All entities in the Group are wholly owned. RWC conducts operations in three regions. Each region receives copies of group policies which set out governance and conduct expectations. Region leaders are members of RWC's senior leadership team and are consulted on expectations and policy matters. A broad group comprising representatives from senior leadership, legal, company secretariat, investor relations, human resources, procurement, internal audit and risk have been consulted and/or involved in preparing this Statement.

Modern Slavery legislation applicable in the UK and USA applies to some subsidiaries. Refer page 24.

RWC's annual reports, social impact (ESG) reports, corporate governance statement and various governance policies can be viewed on our website at www.rwc.com.

This Statement has been authorised by the Board of Reliance Worldwide Corporation Limited.



## Introduction

This statement sets out our progress during the year ended 30 June 2022 in identifying, assessing and reducing modern slavery risks within our operations or supply chains. It also sets out our goals and ambitions for the 2023 financial year. Modern slavery can occur in various forms including servitude, forced or compulsory labour and human trafficking.

At RWC, our values underpin everything we do and we aim to provide a strong, positive organisational culture. One that provides a safe and encouraging work experience for our people, encourages diversity, equity and inclusiveness and makes RWC an employer of choice.

We constantly strive to develop fresh ideas to keep people safe, productive and comfortable. Our culture encourages our people to think differently, challenge the status quo and shape the world around us. Our values drive how we work together, as one global team. We remain committed to transforming productivity and efficiency for customers in plumbing and heating, as well as other specialist industries. Our innovative pipe connecting systems, valves and engineered solutions make an immediate, tangible difference to the performance, safety and sustainability of the modern built environment. Within our established family of brands, you will see a reflection of the shared beliefs, sheer dedication and focused ethics of every single member of our team. At RWC, we strive for no barriers and no dividers. We're an open company with an open culture to match, encouraging company-wide conversations and listening to everyone's opinions.

In 2022, the Board established two new committees, Environmental, Social and Governance ("ESG") and Health & Safety, to strengthen its capability and focus in these areas. This includes oversight of our progress on modern slavery.

We will continue to seek to make improvements through further refinement of our due diligence, risk management systems and policies. We look forward to continuing to report on our progress.

Heath Sharp, Managing Director and Chief Executive Officer December 2022



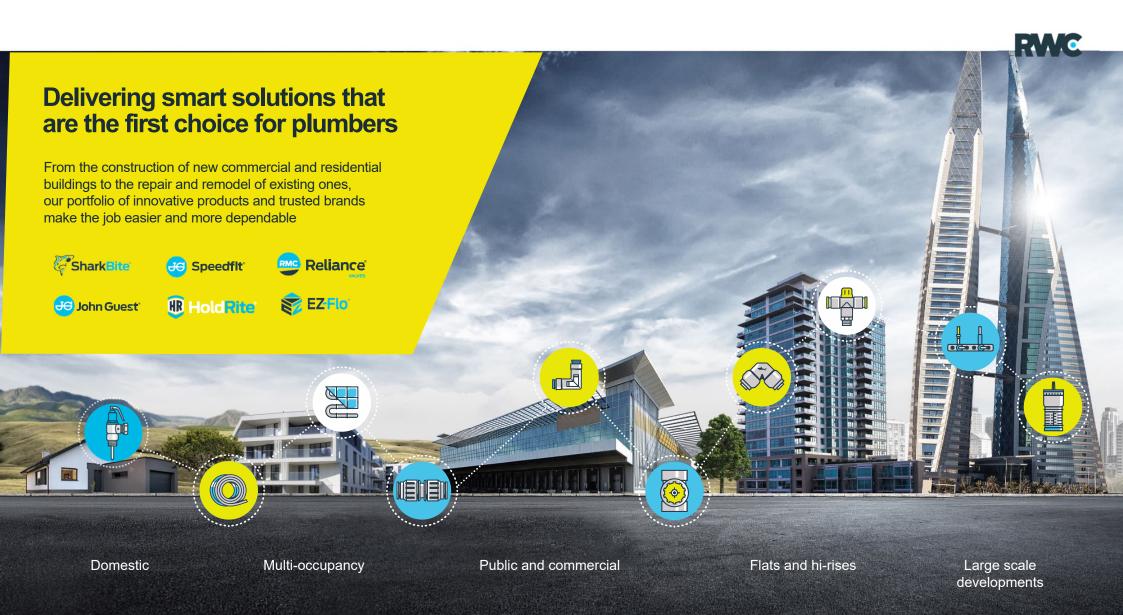
## About RWC

RWC is a global market leader in the design, manufacture and supply of high quality, reliable and premium branded water flow and control products for the plumbing and heating industry, primarily the "behind the wall" plumbing sector. We manufacture and distribute products that disrupt and transform traditional plumbing methods by aiming to make the installer's job quicker and easier. The majority of sales are to the repair and renovation market through an extensive network of retail, OEM and wholesale channels. Our global manufacturing operations are vertically integrated and we have a strong culture of innovation, research, development and engineering capability. Appendix 1 lists Group entities involved in the manufacture or distribution of our products and the locations of those entities.

RWC's range of high-quality products include brass and plastic Push-to-Connect ("PTC") fittings, PEX pipes, valves, manifolds, underfloor heating components and various accessories. RWC markets its products under industry-trusted brands such as SharkBite, Cash Acme, Reliance Valves, RMC, HoldRite, JG Speedfit, ProLock, EZ-Flo and Eastman. Please visit our website, <u>www.rwc.com</u>, for additional information on our brands and products.

Plumbing matters and we make it better. Our strategy has three drivers of growth. The first of these is creating value through product leadership. We achieve this with smart product solutions that improve the productivity of the plumber and make their lives easier. At its core are products that are easier to use, work seamlessly together, and allow the plumber to get more work done. The second element of our strategy is creating value for our distribution partners. We do this through high levels of service, differentiated brands, continued product innovation, and clever merchandising execution. The third element is industry leading execution. We make and deliver the highest quality products, running our operations efficiently, safely and sustainably.

Our history traces back to 1949 in Australia and to 1912 in the USA (Cash Acme business acquired in 2002). The UK based John Guest business was founded in 1960 (acquired by RWC in 2018). The EZ-FLO business (US based with manufacturing in China) was founded in 1980 and acquired by RWC in 2021. Further information on our history can be found at rwc.com/living-heritage.





#### Creating value through product leadership

# Solutions for the job site



Smart product solutions that improve contractor productivity, enable the DIYer, and make lives easier.

Working in the field to understand job site requirements and challenges

Product engineering that is creating the future of plumbing

Market engagement to stay on top of trends and uncover acquisition opportunities

# Value for the distributor

Increasing value for the distributor while providing broadest access to our products for the end-user.

Superior customer service provides the foundation partners can count on

Differentiated brands that matter to the user and put more value on the shelf for the channel

Broad distribution puts products in reach of the end-user when they need them



# Industry leading execution



Premium quality products and unrivalled operational efficiency delivering margin growth.

Safety culture to ensure a work environment that protects our people

Lean manufacturing and strategic sourcing to drive quality, margins and resilience

Sustainability focus delivers a more efficient operation while reducing environmental impact

#### RVC





## About RWC: employees and operations

#### Employees

Total employee numbers at 30 June 2022 were 2,845 comprised of 2,751 full time employees, 48 part time employees and 46 contract staff. Contract staff are based mainly in the USA and Australia.

Total employees by geography at 30 June 2022 were:

Total	2,845
EMEA	1,096
APAC	488
Americas	1,261

#### Operations

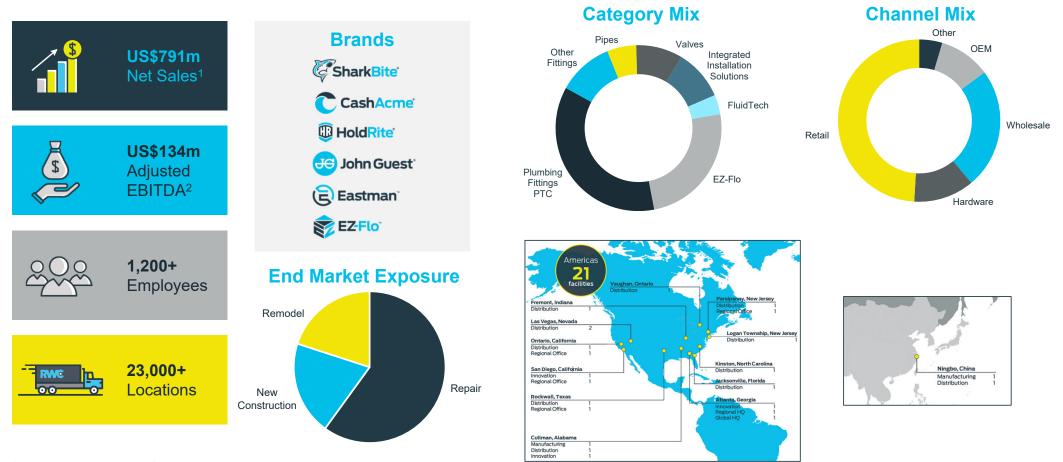
At 30 June 2022, RWC operated in 3 regions with 14 manufacturing facilities, 29 distribution facilities, 5 innovation centres and 9 corporate/regional offices. Refer page 8.

A snapshot of each region is provided on pages 10 to 12.



#### **RWC Americas snapshot**

#### Well positioned brands across a diverse product range serving multiple segments

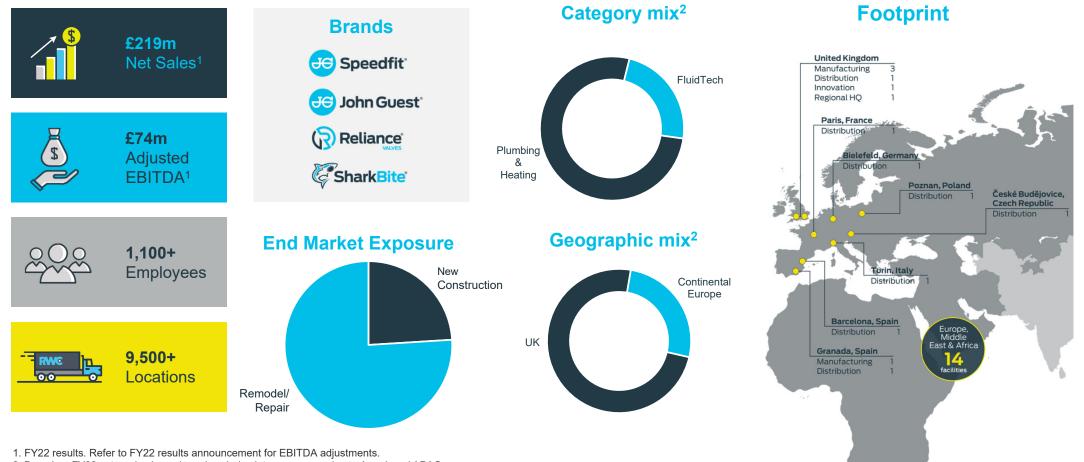


<sup>1</sup> Segment net sales includes \$2.8m of intercompany sales to other segments; FY22 Results <sup>2</sup> Refer FY22 results announcement for EBITDA adjustments



#### **EMEA** business snapshot

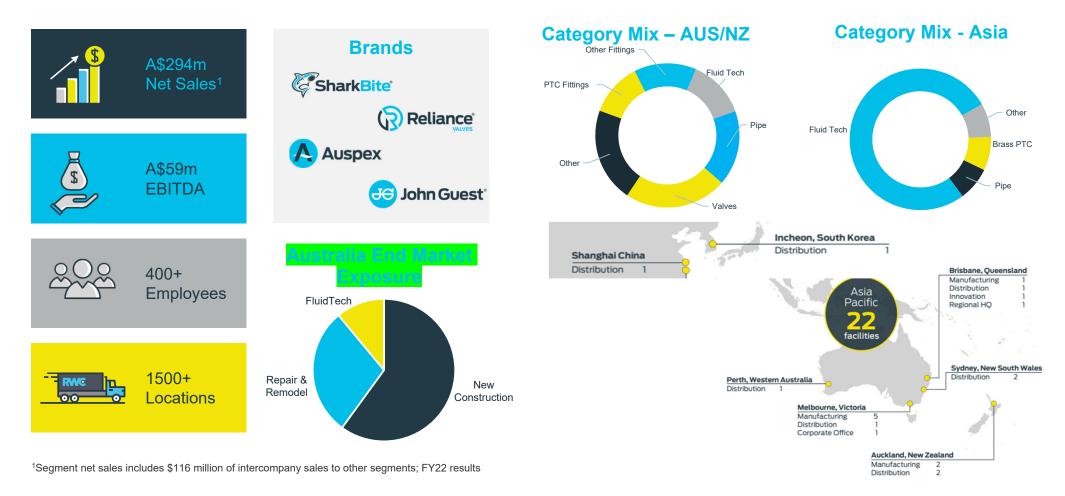
#### Exceptionally strong brands in a diverse set of markets and geographies



2. Based on FY22 external sales only and excludes intercompany sales to Americas / APAC

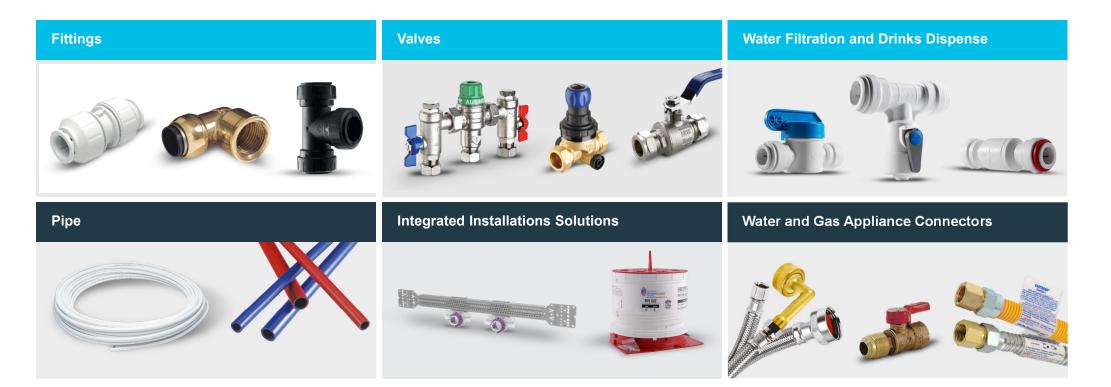
### **RWC APAC snapshot**

### Exceptionally strong brands in a diversified set of markets and geographies





## **Product Portfolio**





## Philosophy towards managing modern slavery in our business

Modern slavery can occur in various forms including servitude, forced or compulsory labour and human trafficking. We want all our people, whether directly in our operations or across our supply chains, to feel safe and respected at work. Every colleague who walks through the doors of any RWC location should feel welcomed, included and supported. It is with this responsibility and in the spirit of human dignity that we cannot be complacent. To deliver on this commitment and to reduce the potential risks of human rights violations or exploitation we have implemented, and continue to implement, a broad set of policies and procedures to identify modern slavery risks and improve our control environment across our operating regions. Modern slavery commitments are incorporated within our policies and procedures and clearly state our intention to respect and uphold human rights, and to identify and address modern slavery. Our commitment to mitigate modern slavery risks, which is informed by internal and external expertise, clearly sets out our expectations of personnel, business partners and other parties directly linked to our operations, supply chains, products or services. We regularly review and update governance structures, policies and processes.

We are proud of our open culture that encourages company-wide conversations and we value everyone's opinions. Through honest dialogue, our people have been able to help direct our social impact efforts to causes and challenges that matter to our employees, communities, customers, suppliers and shareholders.

In developing our policies and procedures, we are committed to complying with all applicable laws and regulations. We also follow the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact and the OECD (Organisation for Economic Cooperation and Development) Due Diligence Guidance for Responsible Supply Chains in conducting assessments of our modern slavery due diligence practices.

We will continue to seek to make improvements through further refinement of our due diligence, risk management systems and policies.



## Approach to managing modern slavery in our business

We believe that we have foundations in place for an effective modern slavery risk management program. We have developed action plans to improve management of modern slavery risks in our supply chains and operations.

We are committed to having:

- Documented and well communicated policies and procedures to control the risk of exploitation in our operations and supply chains. Details of key policies and documents are provided in Appendix 3;
- A risk based due diligence program that incorporates active monitoring of supplier performance;
- Appropriate engagement and competence across our regions supported by ongoing education and training;
- Communication channels available to enable confidential reporting of incidents. For example, RWC provides an anonymous hotline service;
- A governance structure which provides appropriate oversight and guidance; and
- Proactive engagement with external stakeholders.

To achieve these objectives, we regularly undertake analysis of key areas of governance, systems, controls and capabilities to understand the strengths of our current approach and identify opportunities for improvement.



### Modern slavery governance structure



The Board is responsible for setting, reviewing and monitoring compliance with the Company's governance framework, including monitoring management's implementation of the Company's strategy.

The ESG Committee assists the Board in discharging its responsibilities and duties related to material ESG matters. This includes, but is not limited to human rights, diversity, equity and inclusion objectives. The Audit and Risk Committee's key responsibilities include overseeing processes for identifying, assessing and managing financial and non-financial risks, internal controls and systems. The Chairs of each Committee liaise with each other to confirm appropriate oversight of related areas.

The ESG Steering Committee is comprised of the CEO and senior executives. Its responsibilities include overseeing implementation of the Company's initiatives, objectives, strategies and targets for ESG related matters, including Modern Slavery objectives.

Regional executives and managers are responsible for day-to-day implementation of approved strategies and business plans in each region, including the areas of ethical supply chain and human resources.



## Supply and procurement overview

#### **Overview**

RWC manufactures and sources products which are distributed mainly through Retail, Wholesale, and Hardware channels. Products are also sold directly to original equipment manufacturers (OEMs). Raw materials and finished goods components are purchased from local and international sources to supply manufacturing operations located in the USA, UK, Spain, Australia, New Zealand and China.

RWC has over 2,000 suppliers of goods and services. Analysis undertaken in FY2020 identified approximately 1,450 direct, or tier 1, suppliers of goods and services across 30 countries. The inclusion of EZ-FLO during FY2022 has increased this, but our most significant supply chain partners have remained relatively consistent throughout.

Businesses in Australia, USA, UK and Continental Europe supply approximately 60% of the materials and components we use. The remainder is sourced from countries throughout Asia, mainly China.

Total global procurement spend on materials, components and services exceeds \$500m per annum. 60% of this spend is with ~25 suppliers and a further 20% is with another ~55 suppliers.

#### Main areas of procurement spend

- Raw materials for manufacturing processes mainly brass and resins
- · Components for assembly processes
- Finished goods for sale
- Capital expenditures for plants and equipment
- Energy and utility costs
- · Information technology systems and security
- Office management and operating costs

RWC's supplier handbooks and policy documents set out the requirements and expectations of suppliers, including quality standards, risk management, materials sourcing and labour requirements. Purchase Order documentation includes details of our expectations of suppliers on modern slavery issues. Order documentation is embedded in our software systems.

Daily procurement activities are managed by operations teams in each region with oversight provided by each regional CEO.



## Monitoring progress and assessing effectiveness

RWC has several processes in place to monitor the progress of our actions and assess their effectiveness, including:

#### • Regular reporting on progress is provided to the ESG Steering Committee and then through to the ESG Committee and Board

• We continue to develop our reporting to include quantitative data on results and outcomes.

#### • Work with suppliers on understanding of our requirements

 We track the number of suppliers who are risk assessed (refer Appendix 2), the outcomes of those assessments and how any identified issues have been addressed. During FY2022, we surveyed over 130 suppliers selected based on both spend (representing ~70% of total spend) and suppliers with elevated risk profiles. The surveys they answered served to measure their understanding of modern slavery issues current in their operations and supply chains as well as mitigation structures in place to prevent issues from occurring.

#### Continuing education provided by external consultants

• We aim to report on training programs provided and the number of employees trained. During FY2022, over 45 employees received modern slavery training. This included senior executives as well as personnel from supply chain, operations, procurement, quality control and human resources departments.

#### Monitoring our whistleblowing hotline for reported incidents

• Reported incidents are appropriately investigated. Reports on incidents and investigation outcomes are provided to the Audit and Risk Committee. No modern slavery related incidents were reported during the year ended 30 June 2022.

## Modern slavery risks in our Operations and Supply Chains



In 2020, we carried out an assessment of the inherent modern slavery risks in our operations and supply chains. This assessment was undertaken by an external provider and evaluated four areas of potential risk of modern slavery: forced labour (including debt bondage), child labour, human trafficking and forced marriage. To do this, we considered the likelihood and impact of each of these risks in both the geography and industry. Appendix 2 provides a summary of the approach to this assessment and outcomes.

#### Operations

During FY2022, the majority of our manufacturing and distribution workers continued to be located in relatively low risk countries (USA, Australia, Canada, the UK and New Zealand). Following the EZ-FLO acquisition in November 2021, RWC now has over 400 manufacturing employees based in Ningbo, China. We also have employees located in Continental European countries which have been assessed at inherent medium risk for modern slavery. For example, Czech Republic and Italy. Notwithstanding that we consider the controls in place for our business to be relatively robust, we continue to analyse and understand the specific employment conditions in our business and whether there are any vulnerable workers and/or workers who may have been subject to deceptive recruitment practices via recruitment agencies to determine the residual risk levels.

#### **Supply Chain**

We have not identified any inherent high risks of modern slavery in our supply chain but have identified a small number of suppliers who operate in areas that are medium/high risk for modern slavery. These suppliers are located in China, Malaysia, Thailand and Mexico and are supplying us with metal componentry, including brassware and steel cables, packaging materials, electronics and appliances.

We have engaged with a selection of active suppliers who were identified as high or medium risk to understand the residual risks better. To date, we have not identified any cases where we have directly or indirectly caused adverse impacts to human rights from our operations and we are not aware of any instances of contributing to modern slavery in our supply chains.

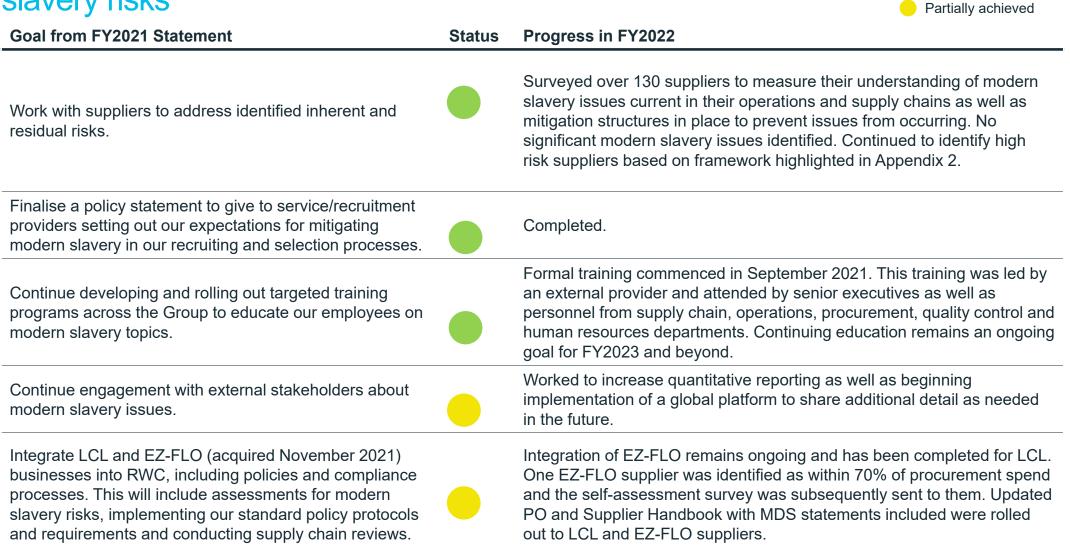
# Actions taken in FY2022 to identify, assess and address modern slavery risks

Goal from FY2021 Statement **Progress in FY2022** Status Developed and began implementation of a global process and platform Continue developing compliance and reporting processes across regions. for addressing modern slavery (amongst other matters) with suppliers. Higher risk suppliers identified using pre-existing assessment data. Complete development of the risk-based assessment A cross section of executives and employees completed training for onsite audit processes alongside an audit template being created. An framework to be used in identifying and assessing higher incident escalation process has been implemented. Finalisation of an risk suppliers overall framework is ongoing. Supplier handbook updated and distributed in Americas and EMEA, Update supplier handbook and associated with distribution ongoing in Australia through early FY2023. documentation to align with modern slavery Purchase order documentation updated to include details of our modern requirements in each region slavery expectations and has been implemented globally. Further develop and refine assessment processes to be undertaken with selected suppliers through self-Self-assessment surveys were sent to suppliers representing 70% of assessment surveys, virtual audit platforms and/or onsite global procurement spend. However, no onsite and/or virtual audits audit activities. Our intention for FY2022 is a phased were completed during FY2022 owing to continued restrictions resulting approach targeted to suppliers representing ~70% of from the COVID-19 pandemic. Several have been conducted so far in global procurement spend. Reports on key results will be FY2023. provided to the ESG Steering Committee.

Fully achieved

Partially achieved

# Actions taken in FY2022 to identify, assess and address modern slavery risks



Fully achieved



## Planned FY2023 actions

The Group has set several improvement goals for FY2023 to further identify, assess and address modern slavery risks in our business. These are allocated between continuing and new actions.

#### **Continuing actions**

- Ongoing enhancement of compliance and reporting processes across regions
- Refine our risk-based assessment framework and reporting methodology used in identifying and assessing higher risk suppliers.
- Engage with suppliers on modern slavery issues and RWC's expectations through:
  - Continuing review of supplier handbooks and other documentation to confirm modern slavery requirements are properly reflected in each region. These changes will also be reflected in Purchase Order documentation.
  - Further developing and refining assessment processes to be undertaken with selected suppliers through self assessment surveys, virtual audit platforms and/or onsite audit activities.
  - · Work with suppliers to address identified inherent and residual risks.
- Development and deployment of targeted training programs across the Group to educate our employees on modern slavery topics.
- Engagement with external stakeholders about modern slavery issues.



## Planned FY2023 actions

The Group has set several improvement goals for FY2023 to further identify, assess and address modern slavery risks in our business. These are allocated between continuing and new actions.

#### New actions planned for FY2023

- Execute selected on-site audits of suppliers. External providers may be engaged to assist with conducting on-site audits.
- We intend again assessing the inherent risks in our operations and supply chains. Our previous external review was undertaken in 2020 (see Appendix 2). We may engage a third-party consultant to conduct this review, evaluate our modern slavery assessment program and identify opportunities for improvement.
- Further develop our processes for monitoring progress and measuring the effectiveness of implemented actions.
- Further engage with Tier 1 suppliers around modern slavery topics with the goal of eventually involving our key Tier 2 suppliers.



## Other reporting on modern slavery

- Reliance Worldwide Corporation (UK) Limited, incorporated in the United Kingdom, is required to report on compliance with the requirements of the UK Modern Slavery Act 2015.
- Reliance Worldwide Corporation, incorporated in the USA, has published a statement in accordance with the California Transparency in Supply Chains Act (California Civil Code Section 1714.43).

## Appendix 1



The following lists entities in the Group actively involved in the manufacture or distribution of RWC's products during FY2022. Dormant and intermediate holding companies are excluded.

Name of Entity	Country	Distribution	Manufacturing
Reliance Worldwide Corporation (Aust.) Pty Ltd	Australia	✓	$\checkmark$
Reliance Worldwide Corporation (NZ) Limited	New	✓	$\checkmark$
	Zealand		
Reliance Worldwide Corporation (Canada) Inc	Canada	✓	-
Reliance Worldwide Corporation	USA	✓	$\checkmark$
EZ-Flo International, LLC	USA	✓	-
Reliance Worldwide Corporation (Europe) S.L.U.	Spain	$\checkmark$	$\checkmark$
Reliance Worldwide Corporation (UK) Limited	United	✓	$\checkmark$
	Kingdom		
Reliance Worldwide Distribution (Europe) Limited	United	✓	-
	Kingdom		
John Guest Automotive GmbH	Germany	✓	-
John Guest GmbH	Germany	✓	-
Reliance Worldwide Corporation France SAS	France	✓	-
John Guest SRL	Italy	$\checkmark$	-
John Guest Korea Limited	Korea	$\checkmark$	-
John Guest Czech S.R.O	Czech	✓	-
	Republic		
John Guest SP zoo	Poland	✓	-
John Guest (Shanghai) Trading Co. Ltd	China	✓	-
Ningbo Rockwall Manufacturing International, Co Ltd	China	-	$\checkmark$

# Appendix 2 – Analysis of modern slavery risks in our Operations and Supply Chains

In 2020, we engaged an external provider to undertake an assessment of the inherent modern slavery risks in our operations and supply chains. The inherent risk identification process was undertaken for all RWC facilities. Below is a summary of the approach to this assessment and outcomes.

*Country risk analysis*: Using human rights databases, indexes and reports from internationally recognised bodies, including the Global Rights Index, the International Labour Organization, and the World Bank, a modern slavery risk rating was determined for each country within the operations and supply chains scope.

*Industry risk analysis*: An industry specific assessment of the likelihood and impact of known modern slavery risk factors for RWC's operations and supply chain was conducted. The risk factors considered include labour intensity, skill level, the presence of opaque intermediaries, the level of industry regulation and the presence of migrant labour. A comparison was also carried out in relation to known modern slavery violations or risks in the industry within the past 10 years.

We then established an inherent risk score for each supplier and operational activity resulting in a risk assessment grouping of High, Medium/High, Medium/Low and Low.

The number of employees and the supplier spend were taken into consideration to determine the scale and impact of these risks but do not affect the inherent risk scores at this level.

These inherent risk scores are now being used to inform our management of risk and ongoing due diligence over our operational activities and supply chains.

We acknowledge that there are risks of modern slavery as RWC conducts business with suppliers in our supply chain. However, based on our analysis, we have a high level of confidence that the risks of modern slavery are minimal for our Tier 1 suppliers.



## **Appendix 3: Key Policies and Documents**

RWC has policies and documents which connect with our approach to addressing modern slavery. The list below is not exhaustive.

- **Code of Conduct:** Outlines the actions and behaviours expected of our employees in the workplace, including legal compliance guidelines and ethical standards.
- Global Whistleblowing Policy: Provides guidance on reporting suspected unethical, illegal, or fraudulent conduct by third parties or those within RWC.
- Anti-Bribery and Anti-Corruption Policy: Sets out RWC's commitment to comply with the laws and regulations addressing corruption, fraud or bribery in the countries where we do business.
- Modern Slavery Policy: Sets out RWC's policy on modern slavery. Distributed to key service providers and recruiting agencies.
- **Region Supplier Handbooks:** Outlines the mandatory requirements for suppliers including quality standards, risk management and approval for all material sources. Region handbooks have been updated to include RWC's policy on modern slavery.
- Global Ethical Code of Practice for Supply Sites Outside of Australia: Provides guidance and instruction on the minimum standards acceptable to RWC in the manufacture of components and raw materials and supply of finished products.
- Americas Supplier / Procurement Code of Conduct: Sets out the expectations of RWC's suppliers, including prohibitions on the use of child labour, physical punishment, forced or compulsory labour as well as any other forms of human abuse.
- EMEA Recruitment / Agency Workers Policy: States that RWC uses only specified, reputable employment agencies to source labour.
- Modern Slavery Assessment Forms: Various forms used for due diligence assessment of modern slavery risks in supply chains and service providers.



## Directory

#### **Corporate office**

Reliance Worldwide Corporation Limited Level 26, 140 William Street Melbourne, Victoria 3000 Australia

#### **Global operating headquarters**

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#### Contact

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Reliance Worldwide Corporation Limited's ordinary shares are quoted on the Australian Securities Exchange (ASX: RWC).



## Index - Australian Modern Slavery Act 2018 (Cth)

REQUIR	EMENT	LOCATION IN STATEMENT
1	Identify reporting entity	Page 3
2	Be approved by board and signed by director	Pages 3 and 4
3	Describe the structure, operations and supply chains	Provided throughout the Statement
4	Describe risk of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Provided throughout the Statement
5	Describe the actions taken by the reporting entity and any entity that it owns or controls, to assess and address risks, including due diligence and remediation processes, as well as how the reporting entity assesses the effectiveness of such actions.	Pages 20 to 22 and throughout the Statement
6	Describe the process of consultations with any entities that the reporting entity owns or controls, and if there is more than one reporting entity the consultation between them	Page 3
7	Any other information that the reporting entity considers relevant	Provided throughout the Statement



# Plumbing matters. We make it better.